



**COMFORT  
SYSTEMS USA**

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# **LABOR & HUMAN RIGHTS POLICY**

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OCTOBER 4TH, 2022

# Introduction

Comfort System USA, Inc. (“CSUSA”) is committed to conducting business in a manner that respects the human rights and dignity of all. CSUSA supports international efforts to promote and protect human rights including the United Nations Universal Declaration of Human Rights and the United Nations Global Compact. As such, this Labor and Human Rights Policy (this “Policy”), and the procedures highlighted within, is aligned with the standards associated with the Ten Principles of the United Nations Global Compact and the thirty articles set forth by the United Nations Universal Declaration on Human Rights. This Policy applies to all employees, directors, contractors, and suppliers.

## Policy

1. ***Employee Health & Safety*** – CSUSA is committed to the safety of all employees and contractors in our facilities and at our sites of operation. We strive to be an accident-free workplace by providing proper safety equipment and safety training. Prioritizing health and safety is an integral part of everything we do. Each one of us is responsible for acting in a way that protects others and ourselves. Safe behavior is a condition of employment, and we expect the commitment of each director, officer, and employee to make CSUSA an accident-free workplace.
2. ***Working Hours*** – Working hours are not to exceed the maximum set by national laws. Workers shall be allowed at least one day off every seven days. Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill.
3. ***Wages and Benefits*** – Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

# Policy Con't

4. *Career Management & Training* – CSUSA is committed to fostering an environment of employee advancement through management and performance reviews. We judge colleagues, job applicants, and business partners based on their qualifications, demonstrated skills, and achievements. Training, including that required under relevant law and industry specific training (whether mandatory or best practice), will be provided to workers and regular refresher training provided on a timely basis.
  
5. *Diversity, Equity & Inclusion* – CSUSA is dedicated to maintaining an inclusive workspace by supporting diversity internally through increased representation of people of color, sexual orientation, age, and all gender identities in leadership, management, and employees as well as externally through diversity in our supply chain. CSUSA is committed to fostering a culture of inclusion and innovation where all employees feel respected and represented with full and equal access to development and education to further their careers.
  
6. *Discrimination & Harassment* – CSUSA is dedicated to providing a workplace free from discrimination. Any discrimination based on characteristics such as a person's race, color, gender, gender identity, national origin, age, religion, disability, veteran status, marital status, sexual orientation, or other status of individuals unrelated to the individual's ability to perform work will not be tolerated. Any verbal or physical conduct by any employee that harasses another for these characteristics, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment is strictly prohibited. All reported harassment incidents will be taken seriously and investigated.

# Policy Con't

7. *Compulsory or Forced Labor and Modern Slavery* – CSUSA has an absolute opposition to slavery and human trafficking. Compulsory or forced labor of any form is not tolerated. Violation internally or by partners in our supply chain is subject to investigation and appropriate disciplinary action.
  
8. *Child Labor* – Child labor is not to be used in any form in CSUSA's operation or supply chain. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education or under the minimum age for employment in the country, whichever is greatest.


# Conclusion

Any violation of this Policy will subject the employee, director or partner to administrative disciplinary action or immediate discharge. Any company employee or director having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management or through the EthicsPoint whistleblower procedure.

This Policy is to be reviewed annually.

Violations, questions, or concerns regarding this Policy can be directed to:

Comfort Systems USA  
Office of the General Counsel  
675 Bering Drive, Suite 400  
Houston, Texas 77057  
713-830-9600  
legal@comfortsystemsusa.com

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Date	10/04/2022
Reviewed By	Laura Howell, Vice President & General Counsel
Signature	

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