

# Human Rights Policy

## **Plan Your Edge LLC**

a Schwartz Marketing Company

Effective date: December 10, 2024

Policy owner: Company Management

### **1 Purpose and approach**

Plan Your Edge LLC (the Company) respects the dignity and rights of people affected by its operations and business relationships. The Company is owned by Schwartz Marketing & Consulting LLC. This policy applies to our managers, employees, and persons acting on our behalf, and sets expectations for contractors, suppliers, and other business partners.

Our approach is informed by internationally recognized human rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's fundamental principles and rights at work. These references guide our commitments; they do not represent a certification or endorsement.

We seek to prevent harm, address risks appropriate to the size and nature of our operations, and respond when our activities cause or contribute to adverse impacts. We comply with applicable law and seek lawful ways to respect these principles if local requirements create a conflict.

### **2 Equal opportunity and dignity**

We prohibit unlawful discrimination, harassment, intimidation, bullying, violence, and degrading treatment. Work-related decisions must reflect relevant qualifications, performance, and legitimate business needs, without unlawful bias based on race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, or another protected characteristic.

We support equal opportunity and reasonable accommodation as required by applicable law. Everyone should be able to raise concerns about treatment or working conditions without retaliation.

### **3 Freely chosen work and protection of children**

We prohibit forced, bonded, trafficked, or otherwise involuntary labor. Workers must not be compelled to work through threats, unlawful debt, withheld wages, confiscated identity documents, or restrictions on lawful movement. Work must be voluntary, with freedom to leave employment on lawful terms.

We prohibit recruitment fees or related costs being charged to workers to obtain work for the Company. If such fees are identified, we will address the issue and seek appropriate reimbursement or other remedy.

We do not employ anyone below the higher of age 15, the applicable minimum working age, or the age for completing compulsory education. Persons under 18 must not perform hazardous work. Any permitted youth employment or training must protect education, health, and development.

#### **4 Fair working conditions and worker voice**

We comply with applicable requirements for wages, overtime, benefits, working hours, rest periods, and leave. Terms of work should be understandable and provided before work begins. Unlawful deductions, withholding earned pay as punishment, or manipulating records to avoid labor obligations are prohibited.

We respect freedom of association and the right to collective bargaining. Workers may lawfully organize, join or decline to join representative organizations, and engage in protected collective activity without interference or retaliation. Where law restricts these rights, we seek lawful means for workers to communicate concerns and engage with management.

#### **5 Safe and healthy work**

We seek to provide a safe and healthy working environment appropriate to our activities, including office, remote, and customer-site work. Assess relevant hazards, provide appropriate instructions and protective measures, and report unsafe conditions, injuries, and near misses promptly.

No one should be pressured to continue work presenting a reasonable concern of imminent serious danger. Raise the concern and seek a safe resolution. Follow applicable emergency procedures and customer-site safety requirements.

#### **6 Privacy and responsible technology**

Respect the privacy of workers, customers, partners, and other individuals. Access personal information only for authorized purposes and protect it against improper disclosure or use. Monitoring, if used, must be lawful, proportionate, and appropriately disclosed.

Consider potential human rights impacts when designing or deploying business applications, integrations, and automated processes. Do not knowingly support discriminatory, abusive, or unlawful uses. Escalate concerns about harmful use, inappropriate collection of personal information, or exclusion created by a system's design.

#### **7 Business partners and risk assessment**

We expect suppliers, contractors, and partners to uphold comparable human rights and labor standards. Review risks in proportion to the service, location, workforce, and potential severity of harm. Where appropriate, request relevant information, include expectations in agreements, and follow up on identified concerns.

Prioritize serious risks to people, including vulnerable workers and affected communities. Consider information from workers and other affected persons when reasonably available, document relevant findings, and review risks when operations or relationships materially change. We do not represent that every supplier is audited or certified.

## **8 Raising concerns and access to remedy**

Employees, contractors, suppliers, customers, and other affected persons may raise concerns with Company management, by email at [contact@planyouredge.com](mailto:contact@planyouredge.com), or by telephone at +1 305-320-3343. Reports should describe the concern and any relevant information available; proof is not required to make a good-faith report.

If the concern involves the usual management contact, approach another uninvolved manager or an authorized representative of Schwartz Marketing & Consulting LLC. The Company will consider reasonable assistance needed to make the reporting process accessible.

Retaliation against anyone who raises a concern in good faith, seeks a remedy, refuses abusive conduct, or cooperates honestly with a review is prohibited. Information will be handled with reasonable confidentiality, subject to review needs and legal obligations. Absolute confidentiality cannot be promised.

This process does not prevent anyone from using judicial, regulatory, union, or other lawful complaint mechanisms. No Company approval is required for lawful external reporting.

## **9 Responding to identified harm**

Management will assess concerns promptly and arrange a fair review by persons not implicated in the issue. Where the Company causes or contributes to harm, we will take appropriate steps to stop or prevent it and provide for, or cooperate in, a legitimate remedy.

Where harm is directly linked to our services through a business relationship, we will seek to use our influence to prevent or reduce it. Responses may include corrective plans, worker protection, additional oversight, or suspension or termination of a relationship, taking account of potential impacts on affected people.

If unlawful child labor is identified, protect the child's immediate safety and support an appropriate response that considers education and welfare; simply removing the child from work without considering resulting harm may be inadequate. Serious threats to safety or suspected crimes will be referred for appropriate professional or official assistance.

## **10 Oversight and continuous improvement**

Management is responsible for implementing this policy, communicating expectations, and providing guidance appropriate to the roles and risks involved. Covered persons must cooperate with reviews and preserve relevant records lawfully.

We will periodically review identified risks, reports, and corrective actions and update our approach as appropriate. Violations may lead to disciplinary or contractual action, subject to applicable law. No one may authorize abuse or retaliation in pursuit of a business objective.

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