



# Labor and Human Rights Policy

ICT is committed to upholding ethical labor practices and fundamental human rights throughout our operations and supply chain. We recognize that a sustainable business must be built on fairness, safety, equity, and respect for all employees. Our policies are guided by applicable federal, state, and local laws and are designed to align with the United Nations Sustainable Development Goals, particularly:

- **SDG 5:** Gender Equality
- **SDG 8:** Decent Work and Economic Growth
- **SDG 10:** Reduced Inequalities
- **SDG 16:** Peace, Justice, and Strong Institutions

## 1. Fair Wages and Working Hours

*In alignment with SDG 8: Decent Work and Economic Growth and SDG 10: Reduced Inequalities*

ICT complies fully with the **Fair Labor Standards Act (FLSA)** and applicable **state wage and hour laws**, ensuring that:

- All employment decisions are based on merit, qualifications, and performance, supporting inclusive economic participation.
- All employees are paid at least the federal or state minimum wage (whichever is higher).
- Non-exempt employees receive overtime pay for hours worked beyond 40 in a workweek.
- Our remote-first model helps expand access to employment opportunities across geographies while supporting flexibility and work-life integration.
- Working hours are monitored to prevent overwork and burnout, while respecting work-life balance.
- We prohibit all forms of wage theft, including unpaid overtime, improper deductions, and failure to compensate for all hours worked.

We regularly audit payroll and scheduling practices to ensure compliance and transparency.

## 2. Workplace Health and Safety

*In alignment with SDG 8 and SDG 16*

ICT provides a safe and healthy working environment in compliance with the **Occupational Safety and Health Act (OSH Act)** and applicable **state and local safety regulations**. We:

- Maintain facilities that are free from known hazards.
- Provide safety training, equipment, and protocols for relevant roles.
- Encourage employees to report hazards or unsafe conditions without fear of retaliation.
- Conduct routine assessments and continuous improvement of our safety management system.
- Ensure our third-party processors are OSHA 18001 and ISO 14001 certified.

As a mostly remote organization, ICT supports flexible work arrangements while ensuring remote workers have the tools, resources, and ergonomic guidance necessary to work safely and productively from home.

We believe workplace safety is a shared responsibility, and we actively involve employees in developing and improving our safety culture.

## 3. Equal Opportunity and Anti-Discrimination

*In alignment with SDG 5 and SDG 10*

ICT is an equal opportunity employer and does not tolerate discrimination or harassment of any kind. We strictly follow:

- **Title VII of the Civil Rights Act:** Prohibiting discrimination based on race, color, religion, sex, or national origin.
- **Age Discrimination in Employment Act (ADEA):** Protecting employees 40 and older.
- **Americans with Disabilities Act (ADA):** Ensuring equal access and accommodations for individuals with disabilities.
- **Equal Pay Act:** Mandating equal pay for equal work, regardless of gender.

- **No Forced or Child Labor:** ICT strictly prohibits forced, bonded, or child labor, aligning with global standards of ethical work (SDG 8, SDG 16).

We cultivate an inclusive work environment that values diversity and promotes equity at every level.

## 4. Family and Medical Leave

*In alignment with SDG 8 and SDG 10*

ICT recognizes the importance of family and health. We provide leave benefits in accordance with:

- The **Family and Medical Leave Act (FMLA)**, offering eligible employees unpaid, job-protected leave for qualifying family and medical reasons.
- Applicable **state and local paid leave laws**, ensuring that employees in jurisdictions with expanded benefits are properly supported.

We encourage a workplace culture that respects caregiving responsibilities and promotes work-life integration.

## Our Commitment to Continuous Improvement

ICT regularly reviews its policies, procedures, and training programs to remain aligned with best practices, evolving legal standards, and our commitment to human dignity and sustainability. We believe that fair labor practices are not just a legal obligation—but a critical pillar of ethical leadership in the ITAD industry.