

EMCOR GROUP, INC.

Global Human Rights Policy



EMCOR Group, Inc., together with each of its operating subsidiaries (collectively, “EMCOR,” the “Company,” “our” or “we”) is committed to conducting business with the highest ethical standards and in compliance with law and Company policy.

This Global Human Rights Policy (this “Policy”) establishes standards for global business conduct related to human rights and labor for EMCOR employees and vendors. This Policy takes into account, among other things, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. This Policy is issued in conjunction with our Vendor Code of Conduct (the “Vendor Code”) and our Code of Business Conduct and Ethics (the “Code of Ethics”), both of which are incorporated herein by reference.¹ Copies of our Code of Ethics and the Vendor Code can be found at our website at www.emcorgroup.com.

Our employees and vendors are required to conduct themselves in accordance with this Policy and applicable laws. Furthermore, all of our stakeholders – not just our employees but also vendors, customers and members of the communities in which we operate – have an important role to play in ensuring that this Policy, together with the Vendor Code and Code of Ethics, is consistently applied and enforced. To that end, as discussed below under “Reporting of Possible Violations,” we provide information and reporting procedures if any EMCOR employee, vendor or third party has reason to believe that any EMCOR employee or vendor, or any of their respective representatives, may have violated this Policy or any applicable law, rule or regulation, or otherwise engaged in unethical behavior. We are committed to continually evaluating the effectiveness of this Policy and evaluating and improving our policies, procedures and training, in each case with the help of and input from all of our stakeholders, to ensure that the goals of this Policy, the Vendor Code and the Code of Ethics are achieved.

In some cases, this Policy goes beyond mere compliance with law. When differences arise between this Policy and legal requirements, the stricter standard shall apply where permitted by applicable law. EMCOR employees must also comply with EMCOR’s internal policies, which contain additional expectations and requirements applicable to employees and employment practices. EMCOR will assess vendors’ compliance with this Policy and the Vendor Code, and any violations of this Policy and/or the Vendor Code may jeopardize the vendor’s business relationship with EMCOR, up to and including termination of the business relationship. Thus, both vendors and employees should review this Policy carefully.

RESPECT FOR HUMAN RIGHTS

EMCOR expects its employees and vendors to share its commitment to human rights and equal opportunity in the workplace. We believe that all individuals should be treated with dignity and respect. Achieving this goal requires the support and dedication of all of EMCOR’s business partners, including vendors. Vendors are expected to take appropriate actions to require their representatives to follow this Policy when providing goods or services to EMCOR.

Fair Treatment

¹ For purposes of this Policy, the term “vendor” means any firm or individual that provides a product or service to EMCOR, or any of our customers or clients for or on behalf of EMCOR, whether directly or indirectly. Unless otherwise indicated by the context, the term “vendor” also refers to employees, agents, suppliers and subcontractors of the firms and individuals described in the preceding sentence. These employees, agents, suppliers and subcontractors may be referred to as “representatives” in this Policy. All vendors are expected to educate their representatives to ensure they understand and comply with this Policy.

The fair treatment of workers throughout our supply chain is a crucial principle of our business practices. We adhere to all relevant labor and employment laws and expect our vendors to do so as well. Without limiting the foregoing, vendors shall:

- Not engage in discrimination based on race, color, creed, religion, ethnic or national origin, sex, gender identity, gender expression, age, disability, physical attributes, sexual orientation, marital status, citizenship status, military or veteran status, political affiliation, union membership or any other characteristic protected by applicable law, in hiring or other employment practices.
- Not engage in physical discipline or abuse of any kind. Physical discipline or abuse, the threat of physical discipline or abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited. Vendors are expected to communicate with all individuals with civility and respect.
- (1) Maintain an internal process to allow employees to confidentially and anonymously report allegations of mistreatment, discrimination, abuse, violations of law, violations of this Policy, or other ethical violations; (2) conduct a prompt and thorough investigation of any such report and take corrective action as necessary and appropriate, cooperate with EMCOR in any such investigation and provide EMCOR with such information as EMCOR may request; and (3) not retaliate against any representative or employee (or any EMCOR employee) who reports in good faith any potential violation of this Policy or participates in any investigation of an alleged violation of law or policy.

Our Vendor Code contains further employment practices expectations for vendors.

Hours of Labor

EMCOR employee and vendor employee working hours must be reasonable, and EMCOR and its vendors may not require workers to work more than the maximum hours of daily labor set by applicable law. Overtime must be paid in accordance with all applicable laws and regulations.

Fair Compensation

EMCOR employees and vendor employees must be paid living wages under humane conditions. EMCOR and its vendors must provide all workers with clear, written information about their employment conditions with respect to wages before they enter employment and as required by law throughout their term of employment. Deductions from wages as a disciplinary measure are not permitted, unless permitted by applicable law. Wages and benefits paid for a standard working week must meet, at a minimum, applicable legal standards.

Forced Labor and Modern Slavery; Recruitment Fees

EMCOR does not engage in or permit any form of slavery, forced or prison labor, involuntary servitude, debt bondage or trafficking in persons. EMCOR and its vendors must ensure that all work is voluntary, conducted only through freely agreed upon and documented employment terms and paid in accordance with all applicable laws and regulations.

EMCOR employees and vendor employees must have the right to freely terminate employment in accordance with applicable laws and regulations without fear of physical, psychological, sexual or verbal abuse. EMCOR employees and vendor employees may not be required to lodge deposits of identity papers, including passports or work permits.

Recruitment fees may not be charged to employees or potential employees.

Without limiting the foregoing, vendors shall comply with all applicable laws relating to forced labor and modern slavery, including but not limited to the Trafficking Victims Protection Act, the Federal Acquisition Regulation anti-human trafficking rule, U.S. Tariff Act and the Countering America's Adversaries Through Sanctions Act. EMCOR and its vendors may be required to follow additional requirements in connection with goods and services provided to the U.S. government.

Child Labor

EMCOR prohibits the use of child labor in our business and supply chain and requires that all employees of EMCOR and its vendors be of the appropriate age as defined by applicable laws. Neither EMCOR nor any of its vendors may employ an individual under the age of 18 unless such employment is allowed by, and undertaken in accordance with, local law, ethical practice and applicable EMCOR policies.

Diversity and Inclusion

As part of our commitment to diversity and inclusion, EMCOR works to foster an inclusive environment for our employees. We strive to work with vendors that advance principles of diversity, inclusion and equality. It is important for all EMCOR employees and vendors to recognize that certain populations may be more vulnerable to human rights abuses, including women, children, minorities and LGBTQ individuals, and to take steps to protect these populations from such abuses. Our recruitment, hiring, compensation and advancement criteria are at all times based solely on individual merit, qualifications, skill and experience and must not discriminate based on membership of any protected class. We encourage our vendors to provide equal employment opportunity to women, minority, veteran and LGBTQ employees and suppliers. We also encourage vendors to develop and track goals related to diversity and inclusion in their own business and supply chains.

Freedom of Association

Workers must be allowed to exercise freedom of association and receive the full benefit of applicable collective bargaining agreements.

Work Environment

EMCOR is fully committed to ensuring healthy, safe, injury-free workplaces. To help us achieve these goals, EMCOR employees and EMCOR vendors are, to the extent applicable, required to:

- Comply with all relevant health and safety laws and regulations, as well as all standards established by EMCOR, its clients, and/or industry requirements.
- Demonstrate a cultural commitment to maintaining a safe working environment.
- Ensure that all employees and contractors are qualified and equipped to perform activities safely.
- Develop and enforce health and safety procedures that are applicable to the relevant operations and consistent with industry best practices.
- Provide adequate resources to manage workplace safety and to ensure that all personnel understand and properly exercise safety practices and procedures.
- Promptly inform EMCOR of any health and safety incidents that occur while performing services for or on behalf of, or delivering goods to, EMCOR or its clients.

- If employee housing is provided, ensure the housing is clean and safe and has adequate lighting, ventilation, heating and cooling and access to electricity, water and sanitary facilities. Housing must be segregated from work areas and provide for privacy and workers must be free to come and go.

EMCOR further acknowledges that the right to water is a fundamental human right. Our employees, as well as workers throughout our supply chain, should have access to safe drinking water.

TRAINING; ADDITIONAL COMPLIANCE OBLIGATIONS

It is the responsibility of each EMCOR employee and vendor to comply with this Policy and the responsibility of every level of management to see that this Policy is observed by all employees and vendors.

It is the responsibility of every vendor to ensure that its representatives understand and comply with this Policy. Vendors are expected to communicate EMCOR's expectations and requirements as set forth in this Policy to appropriate representatives and conduct training that covers the expectations and requirements of this Policy. EMCOR reserves the right to request the immediate removal of any vendor or representative who behaves in a manner that is unlawful or inconsistent with this Policy or any other EMCOR policy or procedure. If a vendor is hired by EMCOR on behalf of a client, the vendor is also expected to comply with all rules, policies, procedures, and codes of conduct applicable to or maintained by that client. If a vendor believes that a client rule, policy, procedure, or code of conduct conflicts with anything in this Policy or applicable law and such vendor is unsure of what to do as a result, such vendor is expected to work with the vendor's primary EMCOR contact and the client in order to resolve the situation in a mutually satisfactory manner.

Vendors are required to follow any additional requirements contained in any other agreement, policy or procedure of EMCOR or any of its clients.

NO THIRD PARTY BENEFICIARIES

This Policy does not confer, and shall not be deemed to confer, any rights on the part of any third party. No employee, vendor or any other person shall have any rights against EMCOR by virtue of this Policy, nor shall such employees, representatives or other persons have any rights to cause EMCOR to enforce any provisions of this Policy, such decisions being reserved by EMCOR in its sole discretion.

REPORTING OF POSSIBLE VIOLATIONS

Any EMCOR employee who knows, or has reason to believe, that a violation of this policy has occurred must report that violation as provided below and in the Code of Ethics.

EMCOR also expects each vendor to promptly report to EMCOR any violation of this Policy. If a vendor has reason to believe that it or any of its representatives, or an employee of EMCOR or its representatives, may have violated this Policy or any applicable law, rule or regulation, or otherwise engaged in unethical behavior, it is such vendor's responsibility under this Policy to promptly report the violation to such vendor's primary EMCOR contact. If for whatever reason this is not possible or appropriate, please contact any of the following:

- 1. EMCOR's Office of the General Counsel at (203) 849-7800; or**
- 2. EMCOR's Ethics Hotline at (888) 711-3648.**

Other individuals, including vendors' employees, can use the contact information above to report violations and other incidents.

All reports and inquiries will be handled confidentially to the greatest extent appropriate under the circumstances. Individuals who report such information may do so anonymously or request that their identities be held in confidence. Requests that a person's identity be held in confidence will be honored in all cases except as necessary to conduct the investigation and take any remedial action, and in accordance with applicable law, unless the reporting party was involved in a violation of law or improper conduct or the disclosure is required by law. However, a request to remain anonymous may in some cases make it more difficult to follow up and ensure resolution of an inquiry.

EMCOR will not tolerate any retribution or retaliation taken against any individual who has in good faith sought out advice or has reported questionable behavior or a possible violation.

