Matrix Service Company – Human Rights Policy

(Effective September 1, 2021)

1. Policy Statement

Matrix Service Company and its subsidiaries (collectively, "Matrix") is committed to respecting human rights and believes in the "Protect, Respect and Remedy" framework established by the UN Guiding Principles on Business and Human Rights. Just as established through the UN Guiding Principles on Business and Human Rights, the Company's Core Values and policies, we believe that all people are entitled to human rights without discrimination and that every person shall be treated with dignity. That Human Rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, color, religion, language, or other status and that these rights are all interrelated, interdependent and indivisible.

Our commitment to human rights includes the provision of quality work conditions that comply with all applicable labor laws and the principles concerning the fundamental rights described in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including labor principles related to freedom of association, nondiscrimination, and prohibition of forced labor, human trafficking, and child labor.

We strive to ingrain a focus on human rights across our organization and supply chain. Matrix's commitment to social responsibility includes operating our business in accordance with high ethical standards based in integrity and fairness as set forth in our Code of Business Conduct and Ethics.

2. Community and Stakeholder Engagement

Matrix recognizes that we are part of the communities in which we operate and thus, will engage with those communities on human rights matters that are important to their citizens. We will also engage with people in those communities, including indigenous peoples, and other vulnerable and disadvantaged groups. Matrix's goal is to ensure through dialogue that we are listening to, learning from and considering the views of affected communities as we conduct our business.

3. Diversity, Equity and Inclusion

Matrix will actively encourage diversity, equity and inclusion, finding ways of utilizing the differences that exist in our employees to improve our business and make our people feel accepted and recognized. Our employees should reflect the societies where we do business. Our goal is to represent the many and varied cultures of the markets we serve. Matrix is committed to make continuous improvements to be an employer of choice for our people around the world. We are committed to ensuring that all employees feel valued, included and treated with respect and dignity – it is a business need and our responsibility.

4. Safe and Health Workplace

Matrix regards high standards of safety and health as a cornerstone of a successful

business. In support of these principles, Matrix maintains a separate, robust Health, Safety and Environmental program.

5. Workplace Security

Matrix is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. In support of these principles, Matrix maintains separate Workplace Safety and Workplace Violence policies.

6. Working Conditions

Matrix will treat all employees fairly and honestly regardless of where they work. Matrix will follow the applicable federal, state/provincial and local laws and regulations governing working conditions and hours in all jurisdictions where Matrix conducts its work.

7. Fair Wages and Compensation

Matrix will follow the applicable federal, state/provincial and local laws and regulations governing fair wages and compensation in all jurisdictions where Matrix conduct its work. Matrix will require the same legal compliance of its subcontractors and vendors.

8. Freedom of Association and Collective Bargaining

Matrix will follow applicable laws and regulations in all jurisdictions where it operates. Matrix will respect our employees' right to join or form a labor union without fear of reprisal, intimidation or harassment.

9. Forced Labor and Human Trafficking

Matrix prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, modern forms of slavery and any form of human trafficking. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

10. No Harsh or Inhuman Treatment/Harassment

Matrix will not engage in nor support the use of corporal punishment, threats of violence or other forms of mental or physical coercion. Matrix will not engage, support nor tolerate harassment or abuse in the workplace, which is addressed in Matrix's Anti-Harassment and Sexual Harassment policies.

11. Child Labor

Matrix will not tolerate the use of child or forced labor, nor exploitation of children in any of its global operations and facilities.

In the conduct of our business, Matrix:

a) Will not employ children that fall into the definition as stipulated by International Labour Organization (ILO) Convention, notwithstanding the absence of similar protection under any national or local law or regulation.

- b) Will comply with all applicable child labor laws, including those related to wages, hours worked, overtime and working conditions.
- c) Is against all forms of exploitation of children. Matrix does not provide employment to children before they have reached the legal age, as defined by the relevant authorities.
- d) Expects its business partners, including subcontractors and vendors, to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these principles become known to Matrix and not be remediated, Matrix will take serious action, including discontinuation of the business relationship.

It is the responsibility of all management and the Human Resource Department to implement and ensure compliance with this policy at all Matrix operations and facilities.

12. Indigenous People's/Traditional/Land Rights

Matrix has regard for the principles of International Labour Organization (ILO) Convention No. 169 on Indigenous and Tribal Peoples.

13. Guidance and Reporting for Employees

Matrix strives to create a workplace in which open and honest communication among all employees is valued and respected. Matrix is committed to complying with applicable labor and employment laws wherever we operate. Matrix also ensures employees are aware of this and all policies via various communication channels and education.

Any employee who believes a conflict has arisen between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, Human Resources, the Legal/Risk Department, or our Confidential Hotline.

References:

- 1. The Universal Declaration of Human Rights, United Nations
- 2. The international Labour Organization on Fundamental Principals and Rights at Work
- 3. Social Accountability International Standard 8000