

## **Cambridge Corporate Services's Policies and Procedures**

*(last updated March 2024)*

At our core, Cambridge is guided by a commitment to diversity, equity, and inclusion, recognizing the strength and innovation that emerges from embracing varied perspectives and backgrounds. We hold ourselves accountable to environmental sustainability, striving to minimize our ecological footprint and protect the planet for future generations. Worker safety is paramount, reflecting our dedication to providing a secure and supportive environment for all employees. We uphold fair labor practices and prioritize ethical supply chain responsibility, ensuring that our operations contribute positively to the communities we serve and the world at large. These principles form the foundation of our business philosophy, driving our decisions and actions as we work towards a more equitable, sustainable, and responsible future.

Please see the following sections for more details regarding Cambridge's policies:

### **I. Environment and Sustainability**

Cambridge is committed to conducting its business operations and activities in an environmentally responsible manner, and in a way that protects the health and safety of our employees, customers, visitors and contractors. In this regard, our company is committed to compliance with applicable environmental and health and safety laws and regulations. As part of our commitment, Cambridge issues monthly transit checks and MetroCards to all employees in order to encourage the use of public transportation and reduce greenhouse gas emissions. Furthermore, 50% of Cambridge's fleet of subcontractor vehicles are hybrid/electric models to curb emissions. As hybrid/electric trucks become more accessible, this number will increase with the goal of 100%.

Cambridge also participated in the planning, creation, and implementation of UBS's current Green Mailroom Initiatives and is thus familiar with and conscious of these standards.

Cambridge is committed to: developing and administering environmentally sound policies, procedures, guidelines and management systems within our operations, including on a country, region, location or business unit level as needed; communicate relevant standards to our employees, including through training and awareness-raising initiatives; minimize

any adverse impact that our operations have on the environment, including, where possible, recycling reusable materials, investing in communication technologies which substantially reduce the need for travel, while promoting a healthy work/life balance for employees and continuously reviewing our sourcing of sustainable materials where appropriate; provide a work environment that is healthy and safe; collect and analyze data about our environmental impact and health and safety conditions at our locations, and use the data to measure and have a goal of continuously improving our performance; encourage our service providers and suppliers to have their own environmental, health and safety commitments; and communicate our policies and performance with stakeholders and the business community. Environmental responsibility is deeply embedded in Cambridge business policies and operations. We strive to maintain the highest standards in every aspect of our business.

We look for environmental risks using a variety of methods to measure compliance.

- Confirm that all sites are utilizing recycling of materials (98%)
- Conduct annual reviews of vehicle inspection reports to ensure compliance with emission standards (100%)
- X-Ray machines are checked for radiology levels on a regular basis (100%)
- Train all staff on Safe Work Methods and Safe Operating Procedures for all systems (100%)
- Confirm protective devices are worn where any machine operates at 85 DBA or greater (100%)
- The use of Lifting Belt and Safety Glasses where needed (100%)
- These risks are measured and reviewed on an annual basis by the Cambridge Management team and reported to our Executive Committee.

## **II. Diversity Equity and Inclusion**

### **Introduction:**

At Cambridge Corporate Services, we recognize that diversity, equity, and inclusion (DEI) are essential components of a thriving and successful workplace. We are committed to fostering a culture that values and respects the unique perspectives, backgrounds, and experiences of all our employees. Our DEI policy outlines our commitment to creating an inclusive environment where every individual feels empowered to contribute, grow, and succeed.

**Diversity:**

WBENC: Cambridge is a certified Women Owned Business by WBENC.

Recruitment and Hiring: We are committed to promoting diversity in our workforce by actively recruiting and hiring individuals from diverse backgrounds, including but not limited to race, ethnicity, gender, age, sexual orientation, disability, religion, and socioeconomic status.

Supplier Diversity: We strive to promote diversity in our supplier base by actively seeking out and partnering with minority-owned, women-owned, and other underrepresented businesses.

Employee Development: We are committed to providing equal opportunities for professional development and advancement to all employees, regardless of background or identity.

Representation: We aim to ensure diverse representation at all levels of our organization, including leadership positions and decision-making bodies.

**Equity:**

Fair Treatment: We are committed to providing a fair and equitable workplace where all employees are treated with dignity and respect, free from discrimination, harassment, or bias.

Pay Equity: We are committed to ensuring pay equity by regularly reviewing and analyzing compensation data to identify and address any disparities based on gender, race, or other protected characteristics.

Accessibility: We are committed to providing reasonable accommodations to employees with disabilities to ensure equal access to opportunities and facilities.

Work-Life Balance: We recognize the importance of work-life balance and are committed to offering flexible work arrangements and supportive policies to accommodate the diverse needs of our employees.

**Inclusion:**

Culture of Inclusion: We strive to cultivate a culture of inclusion where every employee feels valued, respected, and empowered to bring their authentic selves to work.

Feedback and Accountability: We encourage open communication and feedback regarding diversity and inclusion issues and hold ourselves accountable for creating and maintaining an inclusive workplace environment.

**Implementation and Review:**

This DEI policy has been communicated to all employees and made readily accessible through our company handbook and website. A group of Cambridge Executives, including our CEO, will review this policy annually. Any updates or revisions to the policy will be communicated to employees accordingly.

At Cambridge Corporate Services, we believe that embracing diversity, fostering equity, and promoting inclusion not only strengthens our organization but also enhances our ability to innovate, collaborate, and serve our clients and communities effectively. We are committed to upholding these principles in all aspects of our business operations.

**III. Employee Grievance Procedures**

At Cambridge, respect, integrity and honesty are fundamental to our personal lives as well as professional careers. Therefore, all employees are responsible to conduct business according to federal, state and local statutes, regulations and company policies and immediately report legal and ethical problems and concerns whenever they arise. The channels for reporting these matters are as follows:

- **If a legal or ethical issue or violation of company policy comes to your attention, promptly report it to your immediate supervisor, a Cambridge manager, or any member of the Cambridge executive staff. An individual who receives such a report should immediately contact**

**William Kelly Executive Vice President or Michael Kourmoulis, Director of Human Resources. Telephone: (212) 425-7799; Fax: (212) 425-2882.**

- **They and/or outside legal counsel will investigate all reported instances involving a legal or ethical issue, or violation of company policy.**

Cambridge strictly prohibits retaliation against an employee who reports a possible violation of law, ethics or company policies by others, regardless of the incident or the persons involved. You should feel comfortable reporting any behavior you suspect is contrary to law, company policy or ethical standards through the communications channels described above. Cambridge wishes to provide a pleasant, professional environment for all employees. Whatever way you report a violation, it is important to share your concern with someone in authority so that Cambridge may address the problem.

#### **IV. Health and Safety**

Cambridge is committed to the health and safety of their employees. Senior management must demonstrate a commitment to establishing and maintaining a safe workplace, and all equipment and facilities must be maintained to ensure the safety of their employees.

- Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases.
- Compliance with OSHA and all other safety standards and best practices.

#### **Human Rights and Social Guidelines**

- All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.
- Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of a kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it is independent, trust, non-self-governing or under any other limitation of sovereignty.

- Everyone has the right to life, liberty and the security of person.
- No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
- No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
- Everyone has the right to recognition everywhere as a person before the law.
- All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
- Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.
- No one shall be subjected to arbitrary arrest, detention or exile.
- Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him

Our commitment to Employee Human Rights is a cornerstone of our company. Cambridge maintains the highest standards in the treatment of its workforce.

- We track compliance to our policies in a number of ways:
  - Ensure all employees are eligible to work in the U.S. by providing proper documentation (I-9, Birth Certificate) (100%)
  - Audit "Employee Assistance Program" to ensure all employees are receiving help if needed (100%)
  - Track employee hours to ensure no employee is working excessive hours (100%)
  - Audit of Employee Grievance Process (100%)
  - Audit of entire company staff to ensure Equal Employment Opportunity (EEO) laws are being followed (100%)

## **EMPLOYEE ASSISTANCE PROGRAM**

The Employee Assistance Program (EAP) is a free counseling service offered to all Cambridge employees and their family members. The EAP can help you with personal or family problems that may affect you or family members, ranging from emotional problems to coping with drug or alcohol addiction. The EAP is available 24 hours every day of the year

to talk with you and help you get through a stressful time. You can reach them at. EAP:  
800-531-0200

## **V. Supplier Code of Conduct**

Basic Principles of Code of Conduct for Cambridge Suppliers

### Health and Safety

You have your own minimum requirements for health and safety of your employees and during the supplier selection process you make sure that your suppliers are compliant with these minimum requirements. This means that you as a supplier have to, for example:

- Take responsibility for the health and safety of employees
- Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases.

### Human Rights

Cambridge expects its suppliers to respect the basic human rights of employees as defined in the international conventions of the United Nations (UN), the International Labor Organization (ILO), the Organization for Economic Cooperation and Development (OECD) and the UN Global Compact Initiative. This means that you as our supplier have to, for example:

- respect the personal dignity, privacy and rights of each individual
- Comply with the maximum number of working hours laid down in the applicable laws.

### Anti-Corruption

Cambridge works against all forms of corruption and no contraventions will be tolerated. We expect that our suppliers:

- Tolerate no form of and do not engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

### Environment

Cambridge is committed to conducting its business operations and activities in an environmentally responsible manner, and in a way that protects the health and safety of our employees, customers, visitors and contractors. In this regard, our company is

committed to holding our suppliers to the same standards and compliance requirements with applicable environmental and health and safety laws and regulations.

### Supply Chain

For us it is important that our suppliers are compliant with the principles of our Code of Conduct for Cambridge Suppliers. We expect our suppliers not only to comply with the Code of Conduct for Cambridge Suppliers in their own organization but also to ensure in turn that their subcontractors adhere to the international standards summarized in the Code of Conduct for Cambridge Suppliers.

Supply chain companies must:

- Comply with all local and country environmental, health and safety laws and regulations
- Manage their operations to minimize negative impact to the environment and community
- Provide a safe and healthy work environment for their employees, including training, work procedures and personal protective equipment
- Comply with all applicable workplace health and safety laws
- Establish and maintain a management system or program that encourages continual improvement in environmental, health and safety performance.

### Ethics and legal requirements

Cambridge conducts its business ethically and in accordance with the law and expects supply chain companies to conduct their business in the same way.

Supply chain companies must:

- Disclose in advance any relationship with a Cambridge employee or person working with Cambridge that might represent a conflict of interest
- Comply with all applicable laws regarding fair competition and antitrust
- Keep accurate records of all matters related to their business with Cambridge and provide copies of relevant records on request
- Protect Cambridge confidential information and act to prevent its misuse, theft, fraud or improper disclosure.



Supply chain companies must not:

- Develop any relationship with an Cambridge employee or those working for Cambridge, whether financial or otherwise, which might conflict, or appear to conflict, with the employee's obligation to act in the best interest of Cambridge
- Engage in any form of bribery or offer any incentive to any Cambridge employee or Cambridge employee's family or friends in order to obtain or retain Cambridge business.

We expect all of our employees and those working for us to comply with the law and act ethically in all matters – consistently demonstrating integrity. We have the same expectations of our supply chain. Our goal is that by working together, we can build a sustainable business relationship for both parties and help Cambridge achieve its vision.

#### Gifts and hospitality

Cambridge has a gifts and hospitality policy which requires all employees and those working for Cambridge to seek approval for and register all gifts and hospitality both offered and accepted above a nominal value. Supply chain companies are discouraged from offering gifts and hospitality above a nominal value and must avoid anything involving the offer of cash or cash equivalents or travel that is frequent in nature or expensive.

#### Human rights and human resources

Cambridge is a signatory to the United Nations Global Compact and adheres to these principles. We expect Cambridge's supply chain to respect the human rights of their employees and contractors and treat them fairly, in accordance with all applicable laws.

Supply chain companies must:

- Comply with all applicable child labor laws
- Set working hours, wages and overtime pay in compliance with all applicable laws. Workers should be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater
- Comply with all applicable laws on harassment and abuse of employees

- Employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs (including race, color, gender, nationality, religion, age, disability, maternity or marital status)
- Allow freedom of association. Workers must be free to join associations of their own choosing and have the freedom of collective bargaining where the local law confers such rights.

Supply chain companies must not:

- Use any forced or child labor
- Subject their employees to psychological, verbal, sexual, or physical harassment or any other form of abuse.

### Compliance

Cambridge reserves the right to assess and monitor suppliers' compliance with this Supply Chain Code. Any non-compliant suppliers are expected to implement corrective actions or they will not be considered for future business.

Supply chain companies must:

- Comply with all applicable laws in the provision of products or services to Cambridge
- Implement systems and controls to provide compliance with applicable laws and the principles set out in this Supply Chain Code, including policies, training, monitoring and auditing mechanisms
- Apply these or similar principles to the supply chain they work with in providing goods and services to Cambridge.