

**Altus Group Limited**

**Human Rights Policy**

**Purpose**

Altus Group Limited (together with its subsidiaries and affiliates, “**Altus Group**” or the “**Corporation**”) is committed to adhering to internationally recognized human rights and to protecting the rights of people where Altus Group operates and ensuring they are treated with dignity and respect.

Human rights are the basic rights and freedoms to which all people are entitled, regardless of race, ethnicity, nationality, gender, gender identity and/or expression, sexual orientation, age, disability, religion, veteran status or any other status. Respect for human rights, including women’s rights, is fundamental to the way we do business and is part of our core values across all our business activities and operations. Our commitment to respect all human rights includes our obligations to comply with applicable laws in all countries where we operate. This Human Rights policy (the “**Policy**”) is the foundation of our commitment to respect human rights and provides guidance to our employees, clients, business partners, and external stakeholders of our responsibilities and commitments as well as our expectations of them.

**Scope and Applicability**

This Policy applies to all directors, officers, employees and contractors of Altus Group. This Policy is supported by other Altus Group policies and procedures that set out our expectations in further detail and governs all operations and activities of Altus Group.

**Our Human Rights Commitments**

Altus Group is committed to creating a positive work environment that respects and promotes human rights throughout the organization and in its business relationships by:

- Supporting international human rights and labour standards, including, but not limited to, the United Nations Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
- Maintaining working conditions that, at a minimum, comply with all applicable employment laws, including, but not limited to, working hours, terms of employment, leaves of absence and compensation. This also includes the health and safety of our employees by complying with all applicable health and safety laws.
- Enabling a work environment for all Altus Group personnel that encourages and promotes equality and inclusion for all employees, including marginalized groups, and is free from any discrimination or harassment of any kind. Altus Group does not condone, and will not tolerate, violence, disrespect, prejudice or discrimination toward others whether motivated by race, ethnicity, nationality, gender, gender identity and/or expression, sexual orientation, age, disability, religion, veteran or any other status protected by applicable laws.
- Firmly standing against all forms of modern slavery, human trafficking and child labour. Altus Group has a zero-tolerance approach to child labour, slavery, human trafficking and forced labour, both within our business and in our supply chain. Our commitment to acting ethically and honestly in how we do business is underlined in our Code of Ethics and Business Conduct.
- Regular meetings of our ESG Committee whose members are responsible for developing and guiding the Corporation’s ESG strategy and connecting these efforts throughout the organization.
- Annual review of our Code of Ethics and Business Conduct that all Altus Group employees, officers and directors are required to review and comply with.
- Respecting human rights as a business partner and in our supply chain and expecting our business partners and other stakeholders to respect all human rights. Altus Group maintains a large and

diverse network of business partners and other stakeholders, and firmly believes that they play a critical role in helping us to fulfill our commitment to human rights.

- Recognizing that data privacy and the protection of personal information are fundamental human rights. We are committed to safeguarding the personal data of our employees, clients, and stakeholders, and to implementing information security protocols to prevent unauthorized access, breaches, or abuses of data.

### **Administration**

Altus Group's senior management and the Board of Directors (the "**Board**") are responsible for the implementation and administration of this Policy.

### **Reporting of Violations**

Altus Group is committed to enabling all individuals to have the ability to raise concerns regarding human rights. Altus Group maintains a Whistleblower Policy that provides guidance to Altus Group personnel, business partners, and other stakeholders, and provides the opportunity to voice their human rights concerns without fear of discrimination, harassment and/or retaliation.

Altus Group's Global Ethics Hotline is maintained through EthicsPoint, which is available 24 hours a day, 365 days a year. A confidential and/or anonymous report can also be made to the Chair of the Audit Committee in writing together with a submission via EthicsPoint.

Concerns brought to Altus Group will be promptly investigated and appropriate action will be taken. It is the intention of Altus Group that any complaints be addressed through a process that is fair, having regard to the interests of the Corporation, the person making a complaint, and the person or persons in respect of whom a complaint is made.

### **Oversight and Governance**

The Board, directly or through an explicitly designated committee, is responsible for the ultimate oversight of the Corporation's human rights risk management. This includes reviewing human rights impact assessments, monitoring compliance with this Policy, and overseeing the Corporation's public disclosures regarding human rights and supply chain risks, as applicable.

### **Amendments**

This Policy will be reviewed annually by the Chief Legal Officer, who will recommend any material amendments to the Corporate Governance Committee for further recommendation to the Board for approval. Amendments of a non-material nature may be approved by the Chief Legal Officer.

As approved by the Board of Directors of the Corporation on May 6, 2026.