

Human Rights Statement

Introduction

Element Fleet Management Corp., including its subsidiaries in all regions (collectively, “**We**”, “**Element**” or the “**Company**”), is committed to maintaining a workplace that is safe, healthy, inclusive, ethical and that respects all human rights as outlined in the [Universal Declaration of Human Rights](#).

Recognizing that the International Labour Organization’s [Declaration on Fundamental Principles and Rights at Work and its Follow-up](#) has become a key international benchmark of labour standards, Element has adopted and developed policies and procedures that are consistent with these principles. Element respects the freedom of association rights of all employees.

Element understands the important role that it plays in respecting the human rights of our team members, clients, and the members of the communities in which we operate. Element aims to avoid contributing to adverse human rights impacts through its business activities, including the impact of our supply chain. Our policies and procedures incorporate the guidance provided by the United Nations Human Rights Council in the [Guiding Principles on Business and Human Rights](#) (together with the aforementioned labour standards, the “**Guiding Principles**”).

In accordance with these Guiding Principles and as described in our [Modern Slavery Statement](#), Element believes that forced or compulsory labour, servitude, child labour and human trafficking are severe violations of fundamental human rights and freedoms. The minimum age of employment with Element as a full-time regular employee is 18 years. Element complies with labour laws in the jurisdictions in which it operates providing fair and equitable compensation and working hours that respect the rights of individuals in a workplace that is safe, healthy, and inclusive.

Our Commitment to Our People

Element’s Code of Business Conduct and Ethics (“**Code**”) applies to all Element team members, directors, officers, contractors, vendors, consultants, and other representatives (collectively, “**Element Representatives**”) and summarizes the standards of business conduct that must guide the actions of all Element Representatives.

The Code outlines prohibitions against discrimination (based on race, colour, religion, gender, national origin, sexual orientation, disability, age, or any other protected characteristic within the meaning of applicable law) and abusive or harassing conduct by Element Representatives toward others, such as unwelcome sexual advances, comments based on ethnicity, religion or race, or other non- business, personal comments or conduct that make others uncomfortable.

The Code is supplemented by several policies and procedures that address specific human rights, including but not limited to:

- Diversity, Equity, Inclusion & Belonging Policy
- Commitment to Equal Employment Opportunity
- Harassment, Discrimination and Workplace Violence Policies
- Accessibility Policy

- Health and Safety Program
- Workplace Accommodation Policy
- Flexibility Within a Framework
- Concern Reporting Policy

Annual training is provided to team members on core policies and team members are required to attest to the Company's Code annually.

Element encourages team members to raise concerns with respect to the workplace or adherence to the Company's Code. Element's Concern Reporting Policy outlines the various avenues available to team members to raise such concerns free from discrimination and retaliation. This policy operates in parallel with our Whistleblower Policy which outlines how to raise concerns related to fraud, accounting, internal controls, and other similar matters.

Element understands the importance of Diversity, Equity, Inclusion, and Belonging ("DEI&B") and our DEI&B strategy helps guide the conduct of our business and forms part of our culture. Our DEI&B strategy incorporates elements across all four pillars:

- Diversity: Acknowledging and valuing our differences
- Equity: Fair treatment, access, opportunity, and advancement for all
- Inclusion: Acceptance and respect for all
- Belonging: The outcome where all feel they are treated fairly, accepted, and respected

Business Resource Groups ("BRG") are a component of this strategy and are open to all Element team members, including allies. These resource groups are led and operated by team members with oversight and the support of an executive sponsor. For more information on our BRGs, please refer to the [DEI&B page on our web site](#).

Our Commitment to Our Clients

As a trusted business partner, Element is committed to respecting human rights in our business relationships and we expect that our clients, suppliers, and external stakeholders will assist us in fulfilling this commitment. Each of these groups have their own obligation and responsibility to proactively address human rights matters, and Element is committed to assisting those efforts.

Element's [Vendor and Supplier Code of Conduct](#) ("**Vendor and Supplier Code**") is applied on a global basis and outlines the expectations of vendors and suppliers to share in our commitment and to implement practices that reflect a respect for human rights, that comply with the Guiding Principles, and that are appropriate to the location and context in which their activities take place. Element does not tolerate dishonest, corrupt, unlawful, or unethical behaviour including, but not limited to, bribery, child or forced labour, and discrimination.

Vendors and suppliers are expected to adhere to the Vendor and Supplier Code. We integrate this code into the various practices involved in Element's qualification, evaluation, selection, and management of our vendors and suppliers. Element may conduct onsite or virtual audits of selected vendors or suppliers that provide Element with products or services. Onsite audits may include reviewing relevant vendor or supplier records, policies, and work practices, and inspecting the facilities for compliance with the Vendor and Supplier Code.

Our Commitment to Our Communities

As responsible corporate citizens, we acknowledge that we have the ability and responsibility to assist in removing barriers for underrepresented groups to contribute to a more diverse and inclusive global society. We strive to improve the communities in which we work, live, and conduct business by centering our community engagement and corporate giving efforts on programs that (i) increase equity in education, (ii) encourage environmental innovation to create vibrant and sustainable communities, and (iii) assist those in need when disaster strikes.

By providing team members with paid time to volunteer, Element encourages team members to give back to their communities. These activities support the advancement of our Corporate Social Responsibility mandate and must be in alignment with the principles articulated in our Code relating to diversity, equity, inclusion, and human rights.

Governance

The Sustainability team consults with subject matter experts across regions to ensure effective governance of this statement. This statement will be reviewed periodically, and no less than on an annual basis, to ensure its effectiveness and compliance with applicable laws and best practices.

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