



HUMAN RIGHTS POLICY

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1. **INTRODUCTION**

Spin Master Corp. (the “**Company**” or “**Spin Master**”) has a noble purpose: to create magical play experiences for children and their families. We value the trust placed in Spin Master by children, their parents and families, and are committed to being responsible citizens and custodians of the world that these children will one day inherit.

The Company acknowledges that human rights are fundamental rights and freedoms that all people are entitled to without regard to applicable protected statuses, including race, color, religion, language, pregnancy, ancestry, age, gender, national origin, sexual orientation, gender identity, gender expression, mental or physical disability, genetic information, marital or veteran status. These standards of fair treatment and non-discrimination are, for example, set forth in the Universal Declaration of Human Rights (UDHR), UN Guiding Principles on Business and Human Rights, the International Labour Organizations (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Spin Master’s commitment to supporting and respecting human rights begins with its commitment to comply with applicable national law, wherever it operates. In cases where national laws may present potential conflicts with Spin Master’s commitment to respect human rights, Spin Master strives to develop a solution that offers a workable and lawful balance. Spin Master adheres to and in many cases exceeds all applicable labour laws and standards addressing issues such as equal pay, hours of work and child labour.

In furtherance of these aims, the Board of Directors (the “**Board**”) of the Company has adopted this Human Rights Policy in order to set out the Company’s commitment to respecting human rights.

2. **AREAS OF FOCUS**

2.1 **People**

Spin Master’s policies, including its Code of Ethics and Business Conduct, Diversity Policy, Commitment to a Harassment Free Workplace, Workplace Violence Prevention Program and Whistleblowing Policy, demonstrate its commitment to providing a work environment that supports the dignity of all individuals and that is free from harassment and violence. Spin Master’s employment policies adhere to all applicable domestic laws and honour internally accepted labour standards, including those relating to freedom of association and collective bargaining, non-discrimination, forced or compulsory labour and child labour. Additionally, Spin Master employees are responsible for upholding the company’s commitment to human rights across our business operations. We foster compliance with these policies through training for employees and other initiatives.

Spin Master is committed to working towards gender pay equity, which is disclosed in Spin Master’s public CSR report. The Company has committed to achieving close to 100% rate annually.

2.2 **Products**

The Company embeds stringent safety and quality standards into every product and play experience, ensuring we comply with all applicable regulations where we sell our products. We ensure safety and quality are embedded in every aspect of our business from the design, development, manufacturing and distribution to use phases. Spin Master complies with the social standards of the International Council of Toy Industries (ICTI) Ethical Toy Program (IETP), which is non-negotiable in choosing suppliers. Spin

Master has been an active participant of IETP since its inception. Through regular audits, as well as training and education, the program provides guidance on responsible supply chain practices, including audit process, business ethics, discrimination, disciplinary practices, employee representation, employment practices, environment and chemical safety, modern-day slavery, safety, underage labour, wages and working hours.

Spin Master has adopted a Code of Conduct for Suppliers and Manufacturers which stipulates that our suppliers must have an IETP certification and vendors must be sealed by IETP or an equivalent program such as Workplace Conditions Assessment (WCA), Social Compliance Audit Network (SCAN), Sedex Members Ethical Trade Audit (SMETA), Business Social Compliance Initiative (BSCI) or Responsible Business Alliance (RBA). In addition, the Company has adopted a Statement of Modern Slavery and Transparency in Supply Chains.

2.3 Communities

Spin Master is committed to being a responsible corporate citizen and strives to enhance the communities in which we operate. A respectful stakeholder dialogue underpins our work, and ensures that we engage constructively and openly with the stakeholders affected.

In particular, the Company adheres to global and regional regulations such as the U.S. Children's Online Privacy Protection Act (COPPA) and the self-regulatory guidelines established by the Children's Advertising Review Unit (CARU), and acts in accordance with the Federal Trade Commission Advertising Standards. In addition, Spin Master has supplemented compliance with these regulations with our own corporate policies, including those addressing responsible marketing and content for children and protecting children who are involved in our entertainment, commercials, digital media campaigns and product development process.

Spin Master's commitment to our communities and the rights of children are also demonstrated, in part, through our philanthropic initiatives that support human rights and the UN's Sustainable Development Goals.

3. IMPLEMENTATION

Spin Master's Human Rights Policy supports a consistent approach to respecting human rights in the regions in which it operates. It outlines Spin Master's responsibilities and commitments and is intended to guide day-to-day business decisions.

As part of implementing this policy, Spin Master is committed to generating awareness among its employees through training and communicating its approach to human rights. Spin Master also looks for opportunities to promote a broader understanding of human rights values among its suppliers and business partners through IETP and other forums.

4. REPORTING AND ADDRESSING CONCERNS

Spin Master has various channels to report and address human rights concerns. Employees can report ethics concerns anonymously without fear of retaliation in accordance with the Company's Whistleblowing Policy and its Code of Ethics and Business Conduct. Within Spin Master's supply chain, concerns can be reported through channels operated by compliance organizations such as IETP.

Non-compliance with Spin Master's Code of Ethics and Business Conduct and other policies may result in disciplinary action up to and including termination of employment for cause. Additionally, non-compliance with Spin Master's Code of Conduct for Suppliers and Manufacturers may result in termination of business if a third-party vendor or supplier is unwilling or unable to remediate.

5. GOVERNANCE AND MONITORING

This Human Rights Policy shall be reviewed periodically by the Governance and Nominating Committee. Any amendments to this Human Rights Policy shall be subject to approval by the Board. In addition, the executive team will meet quarterly to discuss CSR matters, which will include an evaluation of this Human Rights Policy and its implementation.