

VERRA

HUMAN RIGHTS POLICY

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HUMAN RIGHTS POLICY

1. Statement of Policy

This Human Rights Policy (“Policy”) affirms that Verra is committed to respecting, protecting, and promoting the human rights and dignity of all individuals within our operations, relationships with business partners throughout the world, and the communities where we live and work. Accordingly, we will guard against complicity in human rights abuses, comply with applicable labor and employment laws, and draw on internationally recognized standards for how we conduct our business.

2. Applicability and Scope

This Policy applies to all activities of Verra worldwide.

The Policy applies to Verra and its employees, as well as any third parties acting on its behalf.

3. Policy Administration

Responsibility for compliance with this Policy is the duty of individuals at every level of the organization.

The Chief Executive Officer of Verra shall designate a Verra employee (“Responsible Officer”) to administer this Policy. The duties of the Responsible Officer include, without limitation, familiarizing Verra employees and third parties acting on Verra’s behalf with this Policy, providing training, and conducting other compliance-related activities as needed based on identified risks.

4. Context

Human rights are inherent to everyone regardless of race, gender, ethnicity, nationality, religion, sexual orientation, physical ability, veteran status, or any other legally protected status.

This Policy is developed to direct the business activities of the organization and is guided by the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work; and other international guidance.

Consistent with these standards, Verra is committed to upholding the following principles: (1) seeking to avoid causing or contributing to adverse human rights impacts through our own activities, and to address

in a timely and appropriate manner such impacts if they do occur, (2) seeking to prevent or mitigate adverse human rights impacts that are directly related to our operations, products, and services through our business relationships, (3) cooperating with our business partners to identify and mitigate human rights risks, and (4) continuing to look for ways to support the promotion of human rights within our operations and our sphere of influence.

5. Standards of Conduct

Verra is committed to conducting business in a manner that reflects the highest ethical and professional standards, including upholding the following standards:

a. Compliance with Laws

Verra is committed to conducting business in compliance with all applicable laws, including, without limitation, laws relating to human rights, work relationships, health and safety, environmental protection, data privacy, anti-discrimination, and anti-corruption.

b. Respect for Human Rights

Verra is committed to demonstrating and upholding respect for human rights, as set out in the Universal Declaration of Human Rights, including the rights of individuals to be treated with dignity and fairness.

c. No Discrimination or Harassment

Verra is committed to creating a work environment where all individuals experience fair and equal treatment and have equitable access to opportunities without facing discrimination, harassment, intimidation, coercion, or other abusive behavior of any kind.

We do not tolerate discrimination on the basis of race, religion, national or ethnic origin, citizenship status, political opinion, age, marital or relationship status, sex, sexual orientation, gender identity, intersex status, pregnancy, parental status, breastfeeding, disability, veteran status, trade union activity, or other legally protected status.

We expect the same level of commitment from all of our business partners to establish a workplace free of discrimination and harassment.

d. No Forced Labor, Human Trafficking, or Child Labor

Verra does not use forced labor, child labor, or human trafficked labor, nor do we knowingly conduct business with any partners that engage in any form of forced labor, child labor, or human trafficking.

Forced labor includes any work for which someone has not offered himself or herself voluntarily; any work performed under threat of penalty; any work that is demanded as repayment for a loan or debt; any work for which the worker was recruited, transported, harbored, obtained, or received through the use of deception, intimidation, threat, force, or other forms of coercion for the purpose of exploitation; and any work performed by a prisoner that is not performed voluntarily or for which he or she does not receive pay.

Signs of forced labor can include holding, destroying, concealing, confiscating, or denying access of employees to their identification documents, such as passports, work permits, and travel documentation, and/or requiring workers to pay recruitment and other fees and costs that create circumstances of debt bondage.

Prohibited **child labor** includes the employment of child workers younger than the applicable required minimum age or workers under the age of 18 to perform work that is physically, socially, or morally dangerous or harmful; that deprives children of an education; or that requires a child to combine education with long hours and heavy work.

Human trafficking usually refers to the process through which individuals are placed or maintained in an exploitative situation for economic gain. This can include recruitment, transportation, transfer, harboring, or receipt of an individual by means of threat or use of force or other form of coercion.

Any Verra employee who becomes aware of any facts or circumstances indicating the possibility of forced labor, child labor, or human trafficking in connection with any aspect of our business must immediately suspend the underlying activities or transactions and contact the Responsible Officer for further guidance. Knowingly failing to do so constitutes a violation of this Policy and may result in disciplinary measures.

e. [Responsible Labor Practices](#)

Verra complies with all applicable labor laws.

f. [Privacy and Protection of Personal Data](#)

Verra supports the right to privacy and the protection of personal data.

Verra has a separate Privacy Policy, which is available on Verra's website.

g. Business Partners and Human Rights

We expect our business partners to comply with contractual requirements relating to human rights compliance and to respect human rights in a manner consistent with this Policy within their own operations and supply chains. This includes maintaining records to demonstrate accountability and transparency.

We seek opportunities to work with our business partners to develop and participate in knowledge sharing and training, increase our shared understanding of human rights impacts directly or indirectly linked to our business, and improve our collective performance in this regard.

h. Identification and Monitoring of Potential Human Rights Impacts

Verra is committed to identifying and monitoring the organization's performance in relation to potential human rights impacts in our industry and sphere of influence.

Where we have concerns that any of our business partners are linked to human rights violations, or if we have concerns that our work will be directly or indirectly linked to human rights violations by a business partner, we will (1) use our Policy as a basis to communicate our expectations and work with them to mitigate these impacts, as appropriate, (2) only proceed with the relationship if we are comfortable that our work will not contribute to human rights violations, and/or (3) always be prepared to walk away from engagements where our integrity or commitment to respect for human rights could be called into question if we continued.

i. Grievance Tools and Reporting

Verra requires reporting of any suspected human rights violations by the organization, any of its employees, or its business partners.

We strive to create a workplace where honest and open communication is valued and respected. We promote an open-door policy and encourage employees to raise their concerns.

Verra prohibits any form of retaliation for reporting in good faith any suspected violation of this Policy.

6. Policy Violations

Violations of this policy may lead to disciplinary action including the possibility of termination.