



The Bernard Group

EXPERIENCE RETAIL DIFFERENTLY

Last Revised 6/12/2023

Human Rights Policy

Policy

The Bernard Group is committed to protecting the health and safety of our employees, reducing our impact on the environment, creating positive social change in our communities and respecting all human rights where we operate.

We continue to recognize that our employees are our biggest asset. We believe in the principles of equality and non-discrimination, are committed to treating all individuals with respect and dignity, and work to use our influence and business relationships to promote the opportunity for all people throughout our supply chain to exercise their fundamental human rights. We do this in accordance with our endorsement of UN Guiding Principles on Business and Human Rights (UNGPs) and our commitment to the UN Global Compact and the Sustainable Development Goals.

The Bernard Group's human rights policy outlines our commitment to respect human rights throughout our supply chain. We communicate our commitment to human rights to our employees and the public via our Code of Conduct, as well as our Supplier Code of Conduct, our health and safety policies, and our diversity and inclusion policies – including our discrimination and harassment policy.

Scope of Commitment

Our human rights policy applies to all employees of The Bernard Group, including part-time and temporary workers as well as independent contractors. Our commitment to respect human rights also extends to all individuals throughout our supply chain, and we use our relationships with our suppliers and other business partners to encourage and promote the principles of this policy throughout their networks.

As a company, we abide by the laws where we operate. We expect our suppliers to share our commitment and standards by adopting similar policies within their business operations and, where possible, work with them to develop the capacity to do so. Our Supplier Code of Conduct further reinforces and clarifies this commitment.

Focus and Important Issues

We are committed to respecting all human rights and our management policies and ongoing procedures cover the breadth of these rights, principles and related issues. Our approach to human rights starts with monitoring our social impacts and understanding how our business activities and operations may impact rights holders, both positively and negatively. We focus on the human rights issues that are most important to our business and in accordance with the United Nations Guiding Principles (UNGP). The list below outlines the Labor and Human rights issues that we find most crucial with our business:

- The elimination of discrimination and harassment
- Diversity and Inclusion
- Workplace Safety
- Child Labor, Forced Labor and Human Trafficking
- Work Hours, Wages and Benefits
- Employee engagement

- Collective Agreements
- Guidance and Reporting for Employees

The Bernard Group will support these issues through programs and policies, and we realize that to fully address these issues, we may be required to implement different types of support, strategies for remediation, or access to grievance mechanisms for employees.

We also recognize that other issues may grow in importance over time and remain steadfast in our commitment to identify these issues and take appropriate actions to respond to potential human rights risks.

Discrimination and Harassment

We're committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity. We conduct annual discrimination and harassment training for all employees.

Diversity and Inclusion

We value the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

Workplace Safety

We're committed to providing a safe and healthy work environment for our employees. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace by addressing and remediating identified risks of accidents, injury and health impacts.

Child Labor, Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including child labor, prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Work Hours, Wages and Benefits

The Bernard Group strives to provide its employees with an excellent working environment that complies with labor and employment laws and includes competitive pay, benefits and optimum working hours. We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Employee Engagement

We provide employees with meaningful work and foster an environment of continuous learning, invest in programs that promote personal and work-related development, and give them insights into their strengths that reinforce our strengths-based culture. In addition, we have a bonus plan that rewards each employee with extra income

based on reaching the company's annual performance goal. We also conduct annual employee engagement surveys that ensures our engagement across the company continues to improve.

Career Management

At The Bernard Group (TBG), we realize that the opportunity for employees to continue to grow and develop job and career-enhancing skills is integral to an employee's happiness and satisfaction with their job. TBG is committed to the promotion of career mobility and will provide opportunities for employees to develop themselves professionally whenever possible when company growth, economic circumstances, priorities and goals permit.

TBG's job opportunities are posted internally and The Bernard Group is committed to maintaining a transparent recruitment process.

Quarterly one-on-one sessions between the employee and their manager are conducted to receive employee feedback on job satisfaction, goals, action items and growth opportunities.

Annual compensation reviews are conducted between the employee and manager.

Employees are encouraged to have goals for growth and expansion of his or her career and skills. The manager will facilitate the process, explore options with the employee, provide opportunities for the employee when possible.

What happens if I need to raise a concern?

If you suspect that there is a violation of human rights occurring in relation to The Bernard Group, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered a violation of human rights you should speak to your manager, Human Resources or the General Manager.

The Bernard Group familiarizes all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially.

If you have experience a violation of your human rights you must tell a leadership team member as soon as possible.

All employees have access to has access to our 24-hour Ethics Helpline to report work-related problems confidentially and without fear of retaliation. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

The Bernard Group also provides resources and referrals related to family matters, legal information, and referrals and guidance with financial matters through our Employee Assistance Program. Employees also have access to grief counseling, financial services, legal support and estate guidance.

Implementation

We conduct due diligence throughout our business to access, identify, prevent and mitigate actual and potential adverse human rights impact to stakeholders across our supply chain. Due diligence tools that we rely on include human rights key performance indicators, awareness training, social compliance audits and regulatory compliance reviews. We conduct annual discrimination training to all employees. When adverse human rights impacts are uncovered in our business activities or operations, The Bernard Group is committed to taking timely action to remediate in a fair and equitable manner in line with the UNGPs.

Our commitment to human rights also includes building and investing in programs designed to change some of the circumstances that contribute to adverse human rights impacts. We also partner with nonprofit organizations and local community organizations to create positive social change.

Governance and Accountability

Respect for human right is an integral part of our sustainability strategy and we report on our progress in our annual CSR report. Management of Human Rights is the responsibility of the Senior Management team, which includes senior leaders, the VP of Human Resources and the Director of Corporate Social Responsibility. Ultimate oversight for human rights results with our Board of Directors.