

Mistras Group - Human Rights and Labor Practices Policy

June 2019

Confidential

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Purpose and Summary

Respect for human rights is deeply ingrained in our values, in how we run our business, interact with stakeholders, and engage with our global community. At Mistras, we value diversity and equal opportunity and do not tolerate discrimination or harassment of any kind.

Mistras is committed to our employees, customers, future generations, and the communities where we live and work. This policy communicates our expectations with respect to human rights, labor practices and the high standard of conduct expected of our employees worldwide. This includes, but is not limited to, ethical and lawful practices concerning: discrimination, workplace health and safety, freedom of association, collective bargaining, child labor, human trafficking, forced or compulsory labor, and indigenous rights.

Scope

This policy applies globally to all Mistras employees including full time, part-time and hourly employees and contingent workforce, including consultants, temporary workers and third-party vendors or consultants engaged on our behalf.

Policy

Mistras adheres to the highest ethical conduct as outlined in the [Mistras Code of Conduct](#) in all aspects of business including health and safety, discrimination and harassment, confidentiality, data privacy, anti-corruption, protection and proper use of Company Assets. Mistras operates on our foundational core values of safety and health stewardship, customer satisfaction, and our employees followed by enhancing shareholders value.

Mistras group respects fundamental human rights and views them as a key component of responsible corporate citizenship. In addition to supporting the fundamental principles contained in the United Nations Universal Declaration of Human Rights, we are committed to applying those principles in our daily operations, interactions with customers and supplier, and in our communities. We continue to work with suppliers to help uphold ethical human rights standards.

Framework and Principles

Mistras Group aims to abide by and uphold the principles of the Corporate Responsibility to Respect Human Rights that are part of the United Nations “Protect, Respect and Remedy framework.” Mistras also recognizes the [UN Guiding Principles on Business and Human Rights](#) as the global standard for identifying, preventing, and addressing the risk of adverse impacts on human and labor rights linked to our business activity.

Risk Assessment, Prevention, and Remediation

It is the responsibility of management to be alert to any potential violations and to ensure compliance with this policy. If a potential violation arises, then the manager must promptly notify our Corporate legal department and/or their Human Resources representative.

Our board level Audit Committee receives periodic reports from management regarding our efforts to monitor and control any major risks. Audit Committee responsibilities also include monitoring the Company's processes and policies regarding compliance with laws and regulations. The Audit Committee reports to the Board periodically of any significant matters that come to its attention. It is the ultimate responsibility of the senior management to assess and manage any exposure to risk associated with human and labor rights.

Should Mistras identify any risk of contributing to an adverse impact in the area of human or labor rights, it will take the necessary steps to cease or prevent its contribution and use its leverage with internal and external business networks to mitigate any remaining impacts to the greatest extent possible.

By doing so, and in accordance with its core business, Mistras pays special attention to international labor standards such as:

- Harassment-free workplace
- Safety – Safe and healthy work environment for employees, customers and visitors
- Payment of minimum wages
- Workplace Accommodation
- Employment at Will
- Voluntary employment
- Business ethics
- Job-related training and certification

Non-Discriminatory Treatment and Anti-Harassment

We are committed to an inclusive workplace environment free from acts of discrimination and harassment. Mistras strives to make all employment decisions based on job-related qualifications without regard to race, color, sex, age, disability, medical condition, physical appearance, marital status, national origin, ancestry, alienage, citizenship status, pregnancy, ethnicity, religion/creed, disability, genetic information, gender (including gender identity or gender expression, or status as a transgender person), sexual orientation, military or veteran status, familial status, status as a victim of domestic violence, stalking or sex offenses, or any other category protected by applicable law (“protected characteristics”).

Workplace Health and Safety

We are committed to the health and safety of our employees, per our [Workplace Health and Safety Standards](#) and Global Workplace Anti-Violence policies. We maintain a global program of regular education, emergency response planning and training to ensure individuals are equipped to identify and manage potential risks in our office workplaces.

Minimum Wages

We comply with local minimum wages. We use market and industry standards to apply fair wages where no wage law is in existence.

No Child Labor

We abide by local minimum age laws and do not use or condone child labor in any circumstance.

Voluntary Employment

We do not use forced or compulsory labor. All employment is voluntary.

Freedom of Association

We respect the right of our employees to freely participate in labor unions, or choose not to participate, and the right to collectively bargain, in accordance with local law.

Anti-Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another for personal or commercial gain.

Mistras has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships by implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or at a client location.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the all anti-slavery laws.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we require commitments against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We prohibit trafficking of all persons in a range of exploitative practices, as defined by the United Nations Office of the High Commissioner for Human Rights.

Reporting and Whistleblowing

Mistras encourages all of its employees to report any acts or information they may witness or of which they become aware which involve violations of human rights, including any of the matters enumerated in this policy. Any person reporting any such matter or participating in any investigation of any such matter will be protected by Mistras' anti-retaliation policy.

Document Management

Policy Name	Human Rights and Labor Practices Policy
Policy Owner(s)	Legal, Human Resources and Corporate Compliances
Applies To	Mistras directors, officers, colleagues and third-party representatives worldwide
Effective Date	July 2019
Related Documents	Mistras Business Code of Conduct; Mistras Code of Conduct Alert Line Policy; Mistras Health and Safety Policy; Harassment free workforce.
Approved By	Chairman and CEO
Supersedes	Human Rights and Labor Practices Policy (2019)