



Corporate Policy: Human Rights

Policy Statement

Respect for human rights is a fundamental value of Hudson Technologies. We are committed to supporting, respecting, and protecting human rights in our relationships with our employees, suppliers, and business partners.

Policy Intent

This Policy is guided by the United Nations Guiding Principles on Business and Human Rights. Hudson's goal is to support, respect and protect human rights—both in our own business activities and in our business relationships with other parties. Hudson expects the same of its suppliers. This policy, combined with those referenced below that address human rights within their respective scopes, reflects our commitment to human rights and ongoing efforts to protect human rights through our operations.

Child Labor

Hudson is committed to the abolition of child labor within its sphere of influence. To that end, Hudson, its employees, and its suppliers must prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Forced Labor

Hudson must not use, be knowingly complicit in, or knowingly benefit from the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and human trafficking.

Hudson also specifically requires that all members of a supplier's workforce understand the terms of their employment, and Hudson prohibits suppliers from withholding or destroying employee identity or immigration documents, passports or work permits.

Fair Compensation

Hudson must compensate employees equitably and competitively relative to the industry and labor market and in accordance with the terms of applicable collective bargaining agreements. Hudson must comply with applicable minimum wage, wage payment, work hours, overtime and benefits laws.

Freedom of Association and Collective Bargaining

The National Labor Relations Act (the "Act") provides that employees, as defined by the Act, have the right to choose whether to form and join trade unions. Hudson, its employees, and its suppliers must ensure that the rights of eligible employees to choose whether to be a member of a trade



union and to bargain collectively as permitted by the Act are not unlawfully interfered with or restricted.

Anti-Discrimination and Harassment

Hudson is committed to a work environment free from discrimination, harassment, and retaliation, and to providing equal employment opportunities to all applicants and employees regardless of race, color, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status.

Hudson, its employees, and its suppliers strive to:

- Provide equal employment opportunities to all applicants and employees.
- Maintain workplaces free from harassment or discrimination toward employees, applicants for employment, customers, or any other individuals who visit or conduct business with Hudson or its suppliers.
- Provide reasonable accommodations to a qualified employee or applicant with a disability, to a pregnant employee or applicant, or to an employee or applicant for their sincerely held religious beliefs or practices, where the reasonable accommodation would enable the employee or applicant to perform the essential functions of their job or to have an equal opportunity to be considered for a job.

Diversity, Equity and Inclusion

At Hudson diversity, equity, and inclusion are fundamental values. Our commitment to human rights is reinforced by our diversity, equity, and inclusion practices because a diverse, equitable and inclusive culture values human rights and empowers our employees to protect human rights and report concerns.

Hudson endeavors to reflect the diversity of the communities we serve and to cultivate a workplace that provides each employee with respect and the opportunity to grow and contribute at their greatest potential.

Safe and Healthy Workplace

At Hudson, dedication to health and safety is a fundamental value; our efforts to ensure a healthy and safe workplace reinforce our commitment to human rights. Hudson, its employees, and its suppliers strive to:

- Operate all aspects of business in a manner that protects the safety and health of employees, contractors, customers, and the general public.
- Provide and use the resources needed to maintain safe and healthy workplaces.
- Identify and take reasonable measures to eliminate or mitigate potential workplace hazards.



- Provide safety information to all employees to educate, train, and protect them from workplace safety hazards.
- Ensure all employees are trained and empowered to stop work anytime that unsafe conditions or behaviors are observed until the job can be completed safely.
- Take action to prevent acts of violence, threats, and physical intimidation in the workplace.

Implementation

Trust, transparency, and accountability support Hudson's commitment to human rights. Hudson and its employees must abide by Hudson's Code of Business Conduct, our foundation for making effective, ethical business decisions and for identifying situations that may raise legal and ethical issues. Hudson's suppliers must meet the expectations of Hudson's Supplier Code of Conduct and contract terms and conditions.

Transparency and Governance

Hudson seeks to identify, manage, and prevent violations of this policy. Anyone can report a human rights concern through the options listed below:

- Management
- Leadership
- Human Resources

Hudson must take any report concerning human rights seriously, no matter how the report is received. Our procedures are designed to promptly review and resolve each issue, as well as routinely monitor and report as necessary.

Should we identify adverse human rights impacts resulting from our business activities, Hudson is committed to the mitigation or fair and equitable remediation of those adverse impacts. Hudson must also seek to promote access to remediation where we are linked to those adverse impacts through our relationships with third parties.

Effective human rights practices are contingent on employee awareness and execution. Hudson must conduct trainings and issue communications to build awareness of the Company's values and business practices. Hudson employees are required on an annual basis to review and commit themselves to following Hudson's Code of Business Conduct.