

Human Rights Policy

CSW Industrials, Inc. (“CSWI” or the “Company”) is committed to respecting internationally recognized human rights principles aimed at promoting and protecting human rights in all of the countries in which we operate. This commitment is consistent with our strategic focus and Core Values set out in our Code of Business Conduct – *Accountability, Citizenship, Teamwork, Respect, Integrity, Stewardship, and Excellence*. We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. While this policy is uniquely our own, it is informed by the United Nations Guiding Principles (UNGP) on Business and Human Rights, Universal Declaration of Human Rights (UDHR), and the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Consistent with our commitment, and in accordance with applicable law and practice, we:

- **Child Labor**
Prohibit the hiring of individuals under the age of (18), the local legal minimum working age, or the compulsory schooling age, whichever is higher. Younger workers may be employed through CSWI-approved, short-term internships, apprenticeships, or work experience programs, but they are never permitted to do work that may threaten their health and safety or hinder their education or vocational orientation and training.
- **Harassment and Discrimination**
Prohibit any type of discrimination or harassment based on age, race, sex, color, national origin, religion, gender identity, disability, sexual orientation, pregnancy status, or any other status protected by applicable law. Furthermore, the basis of recruitment, hiring, placement, training, compensation, and advancement at CSWI is qualifications, skills, experience, and performance. We value the diversity and unique contributions of our employees and have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment.
- **Diversity and Inclusion**
Value diversity as a foundational key to the success of our business strategy. We create, nurture and sustain an inclusive and diverse environment that attracts and retains the highest caliber employees, leveraging their skills and expertise to serve our customers. We are dedicated to attracting and developing individuals of all backgrounds and making CSWI a place where everyone can contribute and grow. We believe that diversity inspires our internal team, and it also drives customer engagement and service.
- **Safe and Healthy Working Conditions**
Provide and maintain a safe and healthy workplace that meets or exceeds applicable safety and health laws, regulations, and internal requirements. We are dedicated to ensuring a safe workplace by minimizing the risk of accidents, injury, and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues. For more information, please see our Environmental, Health & Safety Policy.

Competitive wages and benefits

Compensate employees competitively relative to the industries and jurisdictions in which we operate. We comply with all applicable local laws governing the payment of wages and benefits to employees.

- **Freedom of Association and Collective Bargaining**

Respect our employees' right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives and bargaining with them in good faith.

We promote and respect the rule of law and will comply with applicable law in the countries where we operate. We operate within the framework of our Code of Business Conduct. We maintain relevant policies and procedures to further our intended operations. We expect our business practices to be undertaken in accordance with applicable law, policy, and our Core Values.

This policy supports CSWI's vision to create a work environment that all can take pride in, to be a company others respect and admire, and contribute to a world made better by our actions.

BUSINESS PARTNERS

CSW Industrials has a large and diverse network of business partners and suppliers. We are committed to working with these parties to uphold the principles in this policy and encourage them to assess their own business and develop their own approach to respecting human rights. We expect our suppliers to comply with the obligations set forth in our Supplier Code of Conduct.

OUR VALUES IN ACTION

The foundation of all that we do resides within our Core Values, supported by our Code of Business Conduct. We have undertaken to establish mechanisms to help identify, address, and mitigate potential adverse human rights impacts wherever we do business.

Many of these mechanisms already exist and are fully integrated into our established policies and procedures, which serve in furtherance of CSWI's Code of Business Conduct and Supplier Code of Conduct.

We will consult with relevant internal and external stakeholders to understand human rights related concerns and issues and remediate activity that is inconsistent with this policy. CSWI will assess and escalate human rights issues and concerns regarding our business activity within the informed context of law, policy, and our Code of Business Conduct, and when doing so we will act in accordance with our Core Values.

REPORTING CONCERNS

We encourage employees to report violations of the Human Rights Policy through one of several channels available to them without fear of reprisal. Employees can contact:

- Their direct manager or next-level manager
- Their Human Resources business partner
- The CSWI Legal Department
- Global Compliance and Ethics Hotline (available by phone or web)

Retaliation against an employee for reporting an issue in good faith is a violation of our Code of Business Conduct and our Non-Retaliation Policy. CSWI will not take any action against any party as a result of raising an issue in good faith. We encourage any party to report situations in which they have a good faith belief that the entities or individuals covered under this policy have taken actions that are inconsistent with the principles set forth in this policy. We have dedicated the following confidential and anonymous means to encourage reporting by any party, which is maintained by an independent third party.

Compliance and Ethics Hotline

Online Reporting (can be submitted anonymously): [CSWIndustrials.EthicsPoint.com](https://www.cswindustrials.com/ethics)

Direct Telephone:

U.S and Canada: 1-844-932-1018 – primary language: English

United Kingdom: (British Telecom) 0-800-89-0011 At the English prompt dial (844) 932-1018

Australia: 1800 750 613

Vietnam: reporting by phone is not available, reports must be filed online at the link shown above.

SLAVERY AND HUMAN TRAFFICKING STATEMENT

In accordance with CSW Industrials' Human Rights Policy, this statement includes CSW Industrials' actions to comply with the objectives of the California Transparency in Supply Chains Act 2010, Section 54 of the United Kingdom Modern Slavery Act 2015, and the Australian Modern Slavery Act 2018.

APPLICABILITY

This Human Rights policy is global and applies to all CSWI employees, operations, and activities. CSWI is governed by the law of multiple domestic and foreign jurisdictions. If any element of this policy conflicts with applicable law, CSWI modifies this policy only to the extent of bringing it into legal compliance with applicable law.