



**COMFORT
SYSTEMS USA**

LABOR & HUMAN RIGHTS POLICY

OCTOBER 15TH, 2024

Introduction

Comfort System USA, Inc. (“Comfort”) is committed to conducting business in a manner that respects the human rights and dignity of all. Comfort supports international efforts to promote and protect human rights including the United Nations Universal Declaration of Human Rights and the United Nations Global Compact. As such, this policy, and the procedures highlighted within, is aligned with the standards associated with the Ten Principles of the United Nations Global Compact and the thirty articles set forth by the United Nations Universal Declaration on Human Rights. This Labor and Human Rights Policy applies to all employees, contractors, and suppliers.

Policy

1. ***Employee Health & Safety*** – Comfort is committed to the safety of all employees and contractors in our facilities and at our sites of operation. We strive to be an accident-free workplace by providing proper safety equipment and safety training. Prioritizing health and safety is an integral part of everything we do. Each one of us is responsible for acting in a way that protects others and ourselves. Safe behavior is a condition of employment, and we expect the commitment of each director, officer, and employee to make Comfort an accident-free workplace.
2. ***Working Hours*** – Working hours are not to exceed the maximum set by national laws. Workers shall be allowed at least one day off every seven days. Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill.
3. ***Wages and Benefits*** – Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

Policy Con't

4. ***Career Management & Training*** – Comfort is committed to fostering an environment of employee advancement through management and performance reviews. We judge colleagues, job applicants, and business partners based on their qualifications, demonstrated skills, and achievements. Training, including that required under relevant law and industry specific training (whether mandatory or best practice), will be provided to workers and regular refresher training provided on a timely basis.

5. ***Diversity, Equity & Inclusion*** – Comfort is dedicated to maintaining an inclusive workspace by supporting diversity internally through increased representation of people of color, sexual orientation, age, and all gender identities in leadership, management, and employees as well as externally through diversity in our supply chain. Comfort is committed to fostering a culture of inclusion and innovation where all employees feel respected and represented with full and equal access to development and education to further their careers.

6. ***Discrimination & Harassment*** – Comfort is dedicated to providing a workplace free from discrimination. Any discrimination based on characteristics such as a person's race, color, gender, gender identity, national origin, age, religion, disability, veteran status, marital status, sexual orientation, or other status of individuals unrelated to the individual's ability to perform work will not be tolerated. Any verbal or physical conduct by any employee that harasses another for these characteristics, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment is strictly prohibited. All reported harassment incidents will be taken seriously and investigated.

Policy Con't

7. *Compulsory or Forced Labor and Modern Slavery* – Comfort has an absolute opposition to slavery and human trafficking. Compulsory or forced labor of any form is not tolerated. Violation internally or by partners in our supply chain is subject to investigation and appropriate disciplinary action.
8. *Child Labor* – Child labor is not to be used in any form in Comfort's operation or supply chain. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education or under the minimum age for employment in the country, whichever is greatest.
9. **Land, Forest, and Water Rights and Forced Evictions** – Comfort is committed to upholding the rights of indigenous peoples and their local communities, land, and natural resources. We strictly prohibit forced evictions and will engage in transparent, respectful dialogue with stakeholders to address any concerns.


Conclusion

Any violation of this policy will subject the employee or partner to administrative disciplinary action or immediate discharge. Any company employee having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management or through the EthicsPoint whistleblower procedure.

This Labor & Human Rights Policy is to be reviewed annually.

Violations, questions, or concerns regarding this Labor & Human Rights Policy can be directed to:

Comfort Systems USA
Office of the General Counsel
675 Bering Drive, Suite 400
Houston, Texas 77057
713-830-9600
legal@comfortsystemsusa.com

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Date	10/15/2024
Reviewed By	Laura Howell, Vice President & General Counsel
Signature	



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