

CIRCOR INTERNATIONAL, INC.

HUMAN RIGHTS POLICY

Effective: 19 January 2021

Purpose

At CIRCOR, it is our purpose to keep society SAFE, PRODUCTIVE and MOVING. Human rights are fundamental to this purpose, and we are dedicated to respecting and promoting them in every facet of our global operation.

This Human Rights Policy was developed consistent with the OECD Guidelines for Multi-National Enterprises, United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and UN Universal Declaration of Human Rights.

While it is the duty of governments to protect and fulfill human rights, we as a company are committed to respecting human rights, starting with our employees, contractors, partners, suppliers and others with whom we engage as part of our business. We will focus first on areas where we have the most control and influence, and the communities in which we work and do business, and where we can have the greatest impact.

Scope

Our Human Rights Policy applies to all employees of CIRCOR and any of our affiliates and subsidiaries, including part-time and temporary workers as well as independent contractors (including, among others, any related to security services), anywhere in the world. Our commitment to respect human rights also extends to all individuals throughout our supply chain. As a company, we abide by the laws in the markets where we operate. Where local laws are less stringent than our policies and internationally recognized human rights and employment standards, we are guided by the more stringent policies and standards.

Focus & Priorities

We are committed to respecting all internationally recognized 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, however, with understanding how our products, business activities and operations may impact rightsholders, both positively and negatively. Among the human rights issues we have identified and prioritized for our business are the following:

- diversity and inclusion, including equitable treatment for all people regardless of race, religion, ancestry, national origin, gender identity, gender expression, mental or physical disability or martial or veteran status;
- women's rights and empowerment;
- respect and protection of the rights of vulnerable and marginalized communities;
- freedom of association, collective bargaining and access to grievance mechanisms;
- guarantee of free, prior and informed consent;
- safe, healthy and secure workplace;
- forced labor and human trafficking;

- child labor;
- work hours, living wages and benefits;
- land rights and acquisition, including the rights of indigenous people;
- access to clean water and sanitation; and
- healthy lifestyles, including tobacco-free and whole food choices.

Implementation and Collaboration

We recognize that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved, whether directly or indirectly through our own activities or our business relationships. We use compliance and risk reviews to assess, identify, prevent and mitigate actual and potential adverse human rights impacts to stakeholders across our value chain. We also use these and other business processes to identify where we can better support and promote individuals' ability to live and exercise their fundamental human rights.

We manage these risks by integrating the responses to our due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.

We understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

We recognize the importance of dialogue with our employees and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalization and recognize that women and men may face different risks.

Training

General human rights training is periodically provided to employees. CIRCOR has a comprehensive training plan that ensures employees receive training on human rights matters addressed by other policies as well, including equal employment opportunity, sexual harassment and workplace safety. Training regarding identifying and eliminating human trafficking risk is regularly provided to employees and management with direct responsibility for supply chain management.

Remedy

We place importance on the provision of effective remedy wherever human rights impacts occur, including throughout our supply chain, through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labor rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns.

Identified human rights concerns will be investigated by CIRCOR and remedies are up to and including termination of employment or the third-party relationship with CIRCOR.

At CIRCOR, it is every employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment and aligned with our Human Rights Policy. If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager, Human Resources, Company legal counsel or our Helpline.

Governance

Our work in this area is overseen by the Board of Directors, supported by the Executive Committee and our Diversity & Inclusion Program Office. This ensures that every part of our business is clear about the responsibility to respect human rights.

Going Forward

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labor rights. We believe that working through external initiatives and partnerships, for example with other industry, non-governmental organizations, trade unions, suppliers and other business partners, is often the best way to address shared challenges.

This Human Rights Policy Statement consolidates our existing commitments and brings increased clarity on our processes and procedures. Its principles are implemented across our operations and value chain.

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