

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY STATEMENT**

At Datrose, the way we lead, work and behave is driven by our core values. These values influence the way we meet client needs while respecting the regulatory requirements and the way we promote ethically sound practices within Datrose. Datrose is committed to integrating responsible and sustainable business practices across our operations. It is our policy to act responsibly in our day-to-day relationships with our customers, suppliers, employees, and communities.

We have a long history of supporting the public that we serve. Protecting our shared environment is of fundamental importance to Datrose, as it is to our employees. We have modeled our policy after some of the core principals of the Electronic Industry Citizenship Coalition Code (EICC). These principals are embedded in our business, processes and ways of working. Our leadership in corporate responsibility and sustainable excellence is driven by a bold and influential approach that encompasses:

- high ethical standards when conducting business,
- acts in an environmentally conscientious and responsible manner,
- respects the privacy and dignity of our employees, suppliers, customers, and contractors,
- promotes a work environment of equal opportunity and never engages in unlawful discrimination,
- commits to employing a diverse work force,
- maintains a safe and healthy work environment, and
- spends time, monies and resources to give back to the community and embraces philanthropy.

This Statement is about how Datrose takes account of its economic, social and environmental impact in the way we operate as a business. By demonstrating our commitment to Corporate Social Responsibility we aim to align our business values, purpose and strategy with the needs of our clients, whilst embedding such responsible and ethical principles into everything we do.

The elements of this Statement cover our approach in working with our clients, suppliers and the local community. These principles include established standards to ensure that working conditions are safe, that employees are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

### **LABOR PRACTICES**

is committed to uphold the rights of our employees, and treat them with dignity and respect. This applies to all employees including temporary, student, contract, direct and any other type of worker. We have detailed processes and procedures in place to ensure we are in compliance with all federal, state and local regulations and laws.

- **Labor Standards/Fair Wages**
  - All work is voluntary and workers are free to leave work at any time or terminate their employment.
  - Child labor is not used in any area. The term “child” refers to any person under the age of 15. The use of legitimate internship or student co-op programs, which comply with all laws and regulations, is supported. Workers under the age of 18 do not perform work that is likely to jeopardize the health or safety of young workers.

- Work weeks do not exceed the maximum set by federal, state or local law (whichever is greatest).
- Compensation paid to employees is compliant with all applicable wage laws, including those related to minimum wages, overtime hours and legally mandated benefits.
- In compliance with local laws, employees are compensated for overtime at pay rates greater than regular hourly rates.
- Verification of employment eligibility is always performed per federal and state laws.
- Regular updates to Datrose's Payroll Software occur to ensure current tax rules are being applied.
- Detailed checklists and procedures are used to verify information is processed and verified.
- Creation and maintenance of documents and records ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- Datrose Human Resources conducts a regular review of our processes related to wage and labor practices.
- Ongoing training to our Human Resources, Payroll, and Recruiting staff on the latest changes to regulations.

#### **Performance Management**

- A key opportunity for Datrose to evaluate employees, measure progress, offer constructive feedback, and provide developmental plans and activities is through annual goal setting and performance reviews. Datrose has an ongoing and annual performance program focused on providing thorough, thoughtful and candid feedback and goals to increase employee skill set and ability.
- We also make it a point to recognize top performance and productivity both through formal Awards programs and informal recognition.

#### **Benefits & Total Compensation**

- We recognize that employee benefits participation is an important part of the employment relationship. Some of the benefits Datrose offers include:
  - Health benefits, including medical, dental and vision
  - Income continuity benefits such as disability and life insurance
  - 401(k)
  - Ancillary benefits, such as time off with pay (vacation, personal time, paid-time off program, bereavement pay), employee assistance program, employee discount programs, and voluntary insurance programs (such as cancer protection, accident, enhanced short-term disability, life insurance, and pet insurance).

#### **Health and Safety**

Datrose recognizes that in addition to minimizing the incidence of work-related incident and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production/performance and employee retention and morale. We also recognize that ongoing employee input and education is essential to identifying and solving health and safety issues in the workplace. Our policies address the following areas:

#### **Occupational Safety**

- It is the responsibility of each employee to conduct all tasks in a safe and efficient manner complying with all local, state, federal and customer safety and health regulations, programmatic

standards, and with special safety concerns identified by Datrose for use in a particular area or with a client.

- When on-site at a client location, Datrose employees are required to follow customer safety rules and procedures. We provide additional training for our employees as necessary for or specific to the client.
- Annual review with Risk Management to ensure all policies and procedures are up-to-date.
- Datrose provides new hire and ongoing safety training to address General Safety Rules (including lockout/tagout, hazardous materials, personal protective equipment, etc.), First Aid, Fire, Procedures, Tools, and Chemicals, or any other training required by our customers.
- We also provide training aimed to reduce workplace injury on Lifting and Moving, Proper Lifting Techniques, Stretching, Keyboard Posture, and Proper Sitting.
- Employee exposure to potential safety hazards are controlled through proper design, engineering and administrative controls, preventative maintenance, safe work procedures, and employees complying with all client-specific requirements.
- Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks are identified, evaluated, and controlled. Employees are required to follow all client specific procedures while on-site.
- Worker exposure to chemical, biological and physical agents is identified, evaluated and controlled. Workers are required to follow client specific requirements while on-site.
- Employees are encouraged to bring forth safety concerns and input to ensure a safe working environment.
- Datrose has Ergonomic Specialists available for workplace analysis and reasonable accommodations are provided as necessary (including specialized chairs, keyboards, etc.).
- The use and misuse of drugs and alcohol pose a threat to Datrose and our clients. We enforce a stringent Drug-Free Workplace policy, but also provide avenues for help for those requesting support.
- Employees are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

### **Emergency Preparedness**

- Potential emergency situations and events are identified and assessed, and their impact minimized by implementing emergency plans and response procedures at Datrose and on-site at client locations. Employees are required to follow client rules for emergencies at client sites.
- Emergency plans and procedures include emergency reporting, employee notification and evacuation procedures, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

### **Occupational Injury and Illness**

- Procedures and systems are in place for Datrose offices and every client location to prevent, manage, track and report occupational injury and illness including provisions to: encourage

employee reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate the return of employees to work.

## **FAIR OPERATING PRACTICES**

In addition to being a minority and service disabled veteran owned company ourselves, Datrose also has internal requirements to utilize a diverse supply chain. Our Supplier Diversity Program ensures that diverse suppliers have the ability to compete in the procurement process and to do business with Datrose. In addition, we ensure that the social, environmental and ethical commitments of Datrose are reflected in working with all customers and suppliers.

### **Business Integrity**

- Datrose ensures that we deal responsibly, openly and fairly with clients and potential customers. Datrose upholds the highest standards of ethics including:
  - The highest standards of business integrity are upheld in all business interactions. We have a zero tolerance policy to ensure prohibition of any and all forms of bribery, corruption, extortion and embezzlement.
  - All business dealings are required to be transparently performed and accurately reflected on business books and records.
  - Bribes or other means of obtaining undue or improper advantage are not offered or accepted.
  - If an error occurs, we will acknowledge it and put corrective procedures in place to address the root cause and minimize the likelihood of the problem repeating.
- Information regarding business activities, structure, financial situation and performance is disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices are unacceptable.
- Intellectual property rights are respected; transfer of technology and know-how is done in a manner that protects these rights.
- Programs that ensure the confidentiality and protection of client and employee whistleblower rights are maintained.
- Datrose is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, clients, consumers and employees. Datrose complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- Datrose actively solicits and uses client feedback for continuous improvement.
- Datrose ensures we benchmark and evaluate our procedures and practices in order to constantly improve our competitiveness in the marketplace.
- Datrose assists clients in adhering to the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law (the Dodd-Frank Act). Section 1502 of the Dodd-Frank Act requires all US publicly traded companies to file disclosures and reports with the U.S. Securities and Exchange Commission (SEC) related to the use of Conflict Minerals (tin, tantalum, tungsten and gold) in their products.

### **Suppliers**

We expect our suppliers to:

- Put in place sufficient systems to monitor and take responsibility for compliance with social policies

- Conduct regular assessments of their operations to identify eventual non-compliance cases
- Develop remediation plans to resolve non-compliance cases
- Regularly monitor the effective implementation of remediation plans

## **HUMAN RIGHTS**

Datrose strives to foster safe, respectful, and inclusive workplaces. As a service-disabled minority and veteran owned company, Datrose takes tremendous pride in our culture and diversity. Datrose's culture is committed to respect, integrity, service and excellence. This commitment applies to all of our employees and spans our efforts to develop a diverse workforce, maintain safe and secure workplaces, and support the health, wellness and career development of our employee base. We define these values to hiring; workplace behavior; and employee conduct toward each other, our clients, and our business partners.

### **Humane Treatment**

- There is zero tolerance for harsh or inhumane treatment including sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements are clearly defined and communicated to employees.

### **Harassment Prevention and Non-Discrimination**

- Unlawful harassment, in any form and regardless of intent, is a form of discrimination and interferes with our commitment to equal employment opportunity. Datrose does not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or any other category protected by law. Harassment and/or discrimination contradict our values and have no place at Datrose. Our Employee Handbook clearly addresses our policies and disciplinary action regarding harassment.

The policy:

- Defines harassment (including sexual) and provides examples of prohibited activities.
- Describes our expectations of all employees, including complaint procedures, and the special responsibilities of managers.
- Uses the recommendations of experts and follows the best practices of top companies relative to integrity standards.
- If allegations of harassment or discrimination occur, our Human Resources team (with Senior Management and/or legal council if necessary) acts swiftly to uncover and evaluate facts, take remedial action if warranted, and eliminate root causes of the problematic behavior.
- Our company benefits from a very diverse workforce starting with the board of directors, leadership team and the company itself has over 30% minority and 40% female populations.

### **Open Communication & Freedom of Association**

- Open communication and direct engagement between employees and management are the most effective ways to resolve workplace and compensation issues. Our company has an open door policy that allows employees to communicate discreetly and openly with all levels of management.
- We expect and encourage employees throughout our business operations to make Datrose principles and practices a part of their everyday work, and hold our employees accountable for adhering to our Conduct and Work Rules Policy in our Employee Handbook.

- We keep our policies and practices relating to human rights under continuous and vigorous review, recognizing the need to stay vigilant in a rapidly changing and challenging world.

## **ENVIRONMENT ISSUES**

Protection of the environment in which we live and operate is part of Datrose's values and principles and we consider it to be sound business practice. Care for the environment is one of our key responsibilities and an important part of the way in which we do business. We strive to reduce our energy use, manage our carbon footprint and decrease our overall environmental impact. We commit our company to:

- Comply with all relevant environmental legislation, regulations and approved codes of practice
- Protect the environment by striving to prevent and minimize our contribution to pollution of land, air, and water
- Seek to keep waste to a minimum and maximize the efficient use of materials and resources
- Manage and dispose of all waste in a responsible manner
- Provide training for our staff so that we all work in accordance with this policy statement and within an environmentally aware culture
- Regularly communicate our environmental performance to our employees and other significant stakeholders
- Develop our management processes to ensure that environmental factors are considered during planning and implementation
- Monitor and continuously improve our environmental performance.

The nature of our work as a service provider means that we do not inherently have a high environmental impact but we will take consideration of environmental issues in the professional services we provide and endeavor to reduce our environmental impact to an absolute minimum.

We strive to ensure that Datrose reduces its environmental impact by:

- As a service provider of document imaging we not only strive to reduce paper usage/storage in our own company we support our clients in their efforts in this area as well.
- Reducing our transportation requirements wherever possible by utilizing web-ex and conference calls
- Using hybrid vehicles that are regularly serviced and checked
- Efficient use of energy. Ensuring that all lights and equipment are switched off when not required including end of day checklists to ensure we are conserving energy wherever possible. Use of motion sensor lights. Participation in Energy Efficiencies Program involving thorough review of our energy usage and recommendations for improvement.
- Ensuring that water is used efficiently including use of water coolers with reusable water bottles
- Properly disposing of any electronic office equipment
- Optimizing efficiency for all printing, copying, and mailing functions including printing in mono and double sided wherever possible
- Participating in recycling programs including paper shredding, bottles/cans, and toner cartridges.
- Sourcing recycled materials wherever possible including toner cartridges and paper
- Using scrap paper for drafts and notes
- Encourage electronic marketing materials whenever possible
- Working with like-minded suppliers who take steps to minimize their environmental impact

## **CONSUMER ISSUES (CUSTOMERS)**

Datrose recognizes the importance of understanding the needs and expectations of our customers. We want to ensure that the client's expectations are met and exceeded. Our process for monitoring client satisfaction encompasses regular and frequent communication with the client. The following are some of the methods utilized by Datrose:

- Regularly schedule meetings with client including weekly and quarterly meetings with key topics addressed including client satisfaction, SLAs, scorecards, future initiatives, etc.
- Satisfaction survey. Data collected from this process is used in a number of ways. Any dissatisfaction issues require an investigation and a corrective action. In addition, all issues are tracked on a global basis to ascertain any trends and to effect systemic change if needed.
- Datrose takes client feedback and complaints seriously and encourages open communication to obtain "the voice of the customer". Processes and systems are put in place to minimize process failures and associated complaints. When a complaint occurs, it is addressed immediately. By protocol, the next level of management is made aware of the complaint and can help effect resolution and implement needed corrective actions in a prompt manner. All complaints are logged to help capture trends and identify solutions. After the issue has been addressed, the customer is notified and follow up feedback is obtained from customer to ensure issue was satisfactorily resolved.
- Datrose utilizes the Lean Six Sigma Quality Methodology. Every complaint is viewed as a defect at Datrose and steps are taken to immediately resolve the issue. In addition, corrective action is put in place to prevent reoccurrences of the issue.
- For process failures, Datrose uses the DMAIC process to resolve problems and identify potential trends.

## **COMMUNITY INVOLVEMENT**

Datrose recognizes the importance of community involvement. Our business is dependent upon our communities for employees and for clients, and our communities are dependent on our business for employment opportunities and for our services. Datrose is active in community participation and encourages and supports employee participation in service activities that contribute to our communities. We participate in the following activities:

- Working, supporting and volunteering with local and national charities/organizations
- United Way/Red Cross Campaign
- Annual Company Walk to Cure Diabetes - JDRF, with awards won for achievements
- Urban League
- Employment opportunities for disabled individuals
- Veteran Initiatives – A strong proponent of the "100,000 Jobs Mission," we are passionate about helping those that have served in the military to find meaningful careers.
  - We employ strategic recruiting methodologies to source Veteran candidates, including on-site workshops (both at our offices or Veterans Outreach Centers), 1x1 sessions to better prepare our war fighters to re-enter the marketplace, and attendance at Career Fairs for Veterans.
  - We possess existing long term relationships in the Veteran Community, and have won the Employer of the Year Award from the Veterans Outreach Center and were named a Top 500 Veteran Owned Business (#20) in the USA by DiversityBusiness.com.

- Supporting local schools
  - Pencil Program – Public Education Needs Civic Involvement for Learning
  - Student shadowing program for 9th graders to experience the business world via professional entities
- Undertaking voluntary business advisory services
  - RIT – Future Business Leader Program (Young Entrepreneurs Academy)
  - SBA Advisory Board
  - Local Minority Council
  - ATEP - Action Towards Employment. Helping individuals with disabilities find meaningful employment.

### **SUMMARY**

The operations and ultimate responsibility for the commitment to our corporate social and environmental sustainability principles lies with every employee of DATROSE.

The effectiveness of the Policy Statement will be monitored and reviewed at least annually by the President to ensure the Company's continuing compliance with any relevant legislation and to meet new business requirements and to identify areas in need of improvement. We will also ensure that all changes will be brought to the attention of employees as necessary.

Cheryl Keck  
President & COO  
DATROSE