



Compass Diversified Policy on Human Rights and Labor

Policy Statement

Introduction and Purpose

Compass Group Diversified Holdings LLC ("**Holdings**"), Compass Diversified Holdings ("**Compass**"), and Compass Group Management LLC ("**CGM**", and, together with Holdings and Compass, collectively, "**Compass Diversified**" or the "**Company**") is committed to ethical business practices and compliance with all laws and regulations, including with respect to labor and human rights. Compass Diversified is committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting and supporting all internationally recognized human rights, and treating employees with the utmost dignity and respect. Compass Diversified requires that all of its employees are paid in accordance with applicable laws, are working in safe labor conditions, and are working of their own free will. We recognize our responsibility to respect human rights and avoid human rights abuses. The people we work with are critically important to accomplishing our future goals.

Applicability of Policy

The Company's commitment to promoting human rights applies to all persons involved in the Company's operations, including, but not limited to, directors, officers, employees, contractors, leased workers, suppliers and vendors of Compass Diversified and its subsidiaries. In situations where Compass Diversified does not have overall control of operations, we will take reasonable steps to ensure that involved parties follow human rights principles similar to those stated herein. With respect to our supply chain, we recognize that it is not practical to audit on an ongoing basis to confirm that all of our suppliers are in compliance with all aspects of this Policy. Accordingly, we take a risk-based approach with respect to targeting audits and otherwise seeking to confirm compliance.



Policy

Fair Working Conditions

Compass Diversified prohibits any form of forced labor, including slavery and human trafficking, in our supply chain. Compass Diversified: (1) does not engage in or support child labor, human trafficking or slavery; (2) does not knowingly support companies that utilize any form of child labor, human trafficking or slavery; and (3) expects our suppliers to meet those same standards.

Compass Diversified explicitly prohibits the use of any child labor in its workforce. All individuals must be in compliance with applicable minimum age requirements, and in the absence of such local minimum age requirements, must be at least 14 years of age. Compass Diversified also prohibits the use of any physically or mentally coercive or abusive employment practices. Compass Diversified prohibits the use of any forced labor.

Compass Diversified requires that all individuals doing work on its behalf are paid a fair wage and that all applicable minimum wage laws are complied with. In addition, Compass Diversified prohibits requiring any individual to work in excess of any maximum hours set by local law.

Compass Diversified requires that it, and its suppliers, comply with all applicable laws, orders, rules, regulations and requirements enforced by any foreign or domestic governmental body or entity relating to the design, production, sale, distribution and/or provision of goods and/or services to the Company, which necessarily include anti-slavery and anti-human trafficking laws. Examples of these laws include: the California Transparency in Supply Chains Act, the U.K. Modern Slavery Act, and the Australian Modern Slavery Act of 2018.

Compass Diversified reserves the right to retain an independent third party (or request that a particular supplier retain one reasonably acceptable to us) to audit any supplier's compliance with these requirements, provide both our supplier and us with written certification of the supplier's compliance, and identify any areas for potential improvement. For suppliers with audits that reveal the need for improvement, Compass Diversified requires corrective action plans and re-audits to determine progress. We prefer to work with suppliers and their facilities to correct violations rather than apply sanctions that may cause hardship to workers. Depending on the severity of the or lack of remediation, we reserve the right to terminate our relationship with a supplier.



Non-discrimination

Compass Diversified is committed to providing a workplace free from unlawful discrimination and harassment and complying with all applicable federal, state and local laws governing nondiscrimination in employment.

It is the policy of Compass Diversified not to unlawfully discriminate against any employee or applicant for employment because of race, color, religion, gender, sex, marital status, sexual orientation, national origin, age, genetic information, physical or mental disability, status as a past or present member of the uniformed services under the Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA"), citizenship, or other legally protected characteristics. Compass Diversified strives to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, gender, sex, marital status, sexual orientation, national origin, age, genetic information, physical or mental disability, and status as a past or present member of the uniformed services under USERRA, citizenship, or other legally protected characteristics. Non-discrimination shall apply, but not be limited, to the following actions: employment; promotion; demotion or transfer; recruitment or recruitment advertising; layoff or recall from layoff; termination; rates of pay or other forms of compensation and selection for training.

Labor Relations

Compass Diversified is dedicated to creating a workplace that respects and values all employees and maintains an environment of open and direct communication. The Company strives to develop a mutually rewarding relationship with employees through fairness, trust and integrity. The Company respects the rights of workers to submit grievances as permitted by applicable laws in the countries where the Company does business, without fear of retaliation, intimidation or harassment. Compass Diversified has several methods in which to report grievances, anonymously if employees wish.

Workplace Health and Safety

Ensuring the health and safety of our employees is a top priority. Compass Diversified has enacted numerous processes in order to make sure that the work environment is healthy and safe for its employees. Compass Diversified is also committed to continuously improving the workplace environment through continuous identification and remediation of health and safety issues.



Communities and Stakeholders

Compass Diversified recognizes and enthusiastically accepts our responsibility to the communities we serve, through acting as a good neighbor and through involvement and support for community activities. We respect the rights of people in communities in which we operate.

Reporting Violations of This Policy

If you believe that there has been a violation of any of the principles set forth in this policy, or that Compass Diversified or an organization conducting business on its behalf has violated this policy, please contact our Chief Compliance Officer at:

Compass Diversified
301 Riverside Avenue, 2nd Floor
Westport, CT 06880
Attn: Chief Compliance Officer;

or via electronic transmission to: BOD@compassdiversified.com; Attn: Chief Compliance Officer.

Any Compass Diversified employee, supplier or concerned individual can also anonymously report a potential ethical violation, including human trafficking by a Compass Diversified supplier, via our *Ethics and Compliance Hotline*:

<https://www.whistleblowerservices.com/codiwb/>

You may leave a message using any one of two methods: Secure Web Form and Secure Hotline (telephonic).

Allegations are thoroughly reviewed or investigated by an internal team that includes the Company's Chief Compliance Officer. Allegations found to be credible are dealt with as appropriate. Compass Diversified has a strict anti-retaliation policy for any reports made in good faith.

Compass Diversified reserves the right to interpret, modify, terminate, or amend this Policy, in whole or in part, without notice, at any time. Statements within this Policy regarding conduct that may result in discipline do not limit, in any way, the Company's right to discipline employees for conduct not specifically described above. This Policy shall not be construed as an employment contract or to alter any employee's at-will status.

This Policy was originally adopted by the Board of Directors of Compass Group Diversified Holdings LLC effective as of October 26, 2023.
