

Human Rights Policy Statement

The Middle East Investment Initiative (MEII) is committed to conducting business in an ethical and responsible manner. We respect and support international principles aimed at protecting and promoting human rights, as described in the United Nations' Universal Declaration on Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. In our own operations, MEII seeks to operate in compliance with all applicable laws wherever we do business.

While governments have the primary responsibility for protecting and upholding the human rights of their citizens, MEII recognizes its responsibility to respect human rights in its operations. In addition, we recognize that we have an opportunity to promote human rights where we can make a positive contribution. This includes, among other things, opposing human trafficking and the exploitation of children.

Workplace Policies

We strive to foster safe, inclusive and respectful workplaces wherever we do business. MEII's workplace policies and procedures include commitments to non-discrimination and freedom from harassment, and require MEII to refrain from knowingly entering into relationships that, directly or indirectly, expose employees to undue health and safety risks, or that use child, prison or forced labor, or other similarly exploitative practices. These policies are detailed in our Employee Manual. MEII provides its Employee Manual to employees and periodically provides training to employees on topics covered within the Standards.

Human Rights within our Sphere of Influence

We also strive to foster safe, inclusive and respectful workplaces wherever our programs are implemented. We expect the same commitment from our partners, subcontractors, business associates, licensees and vendors, both in the U.S. and abroad. MEII's Procurement Policy sets forth requirements from its vendors and their products with respect to labor standards and working conditions. The principles embodied in our Code are designed to be consistent with the ILO Declaration on Fundamental Principles and Rights at Work. We implement this commitment through a dedicated compliance program that communicates expectations to our licensing and sourcing partners, monitors factory working conditions, implements facility improvement plans where necessary, and engages with stakeholders.

The Rights of Children and the Young

The well-being of children is of the utmost importance to MEII. We are committed to combating the exploitation of children and therefore prohibit any use of child labor.

Bringing these Policies to Life

Our commitment to respect human rights is a core value of all businesses within MEII, and we take active steps to reflect that commitment in our everyday activities:

- We report on our principles and performance in periodic reports to our Board of Directors, Donors and the UN Global Compact.
- We expect and encourage employees throughout our business operations to make these principles and practices a part of their everyday work, and hold our employees accountable for adhering to our Standards of Business Conduct. We train employees on all our policies and procedures.
- We keep our policies and practices relating to human rights under continuous review, recognizing the need to stay vigilant in a rapidly changing and challenging world.

In support of all of these efforts, we place special value on our ongoing collaboration with a broad range of interested constituencies, including socially responsible investors, industry and peer groups; governmental, inter-governmental and non-governmental organizations; advocacy groups and concerned individuals. This broad engagement helps keep us sensitive to the potential impacts — positive and negative — of our programs, services and operations on the rights, interests and well-being of our employees, guests, customers and communities around the world.