



## Enterprise Labor Rights Policy

**Policy Number:** E1  
**Policy Name:** Enterprise Labor Rights Policy  
**Effective:** May 2021  
**Revised:**  
**Reviewed:**

### Purpose

Spok Holdings, Inc., together with all of its subsidiaries (collectively referred to as Spok in this Policy), is an organization committed to the respect of human rights and upholding labor standards. This commitment includes respecting the dignity and worth of all employees, encouraging all employees to reach their full potential and providing equal opportunities to all employees. Spok is an equal opportunity employer and recruits, hires, trains, promotes, compensates and administers all personnel actions without regard to any legally protected status.

### Spok:

- Recognizes its responsibilities with regards to workplace health and safety, employee privacy and freedom of association;
- Prohibits the use of forced labor and child labor;
- Does not tolerate any form of harassment or discrimination; and
- Works to ensure compliance with applicable labor and employment laws, including those regulating wages and hours.

Spok respects international human rights principles. We are committed to the principles outlined in the United Nations Global Compact and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Spok is also committed to a diverse workplace. Our teams are composed of individuals from different geographies, cultures, ethnicities, religions, races, genders, sexual orientations, abilities and generations. We are committed to fostering diversity, inclusion and engagement across all aspects of our business. We are also committed to integrity and operating at the highest ethical standards.

This Labor Standards Policy in combination with Spok's Core Values and Code of Ethics, reinforces the commitment to ensuring all internal and external stakeholders are treated with dignity and respect. As part of due diligence when entering into acquisitions, new operations and other contractual arrangements, Spok seeks to abide by the requirements set out in this document to ensure any labor standards and human rights issues are identified and assessed.

The Board of Directors, CEO and senior executives are responsible for setting the ethical code and overseeing compliance; however it is the responsibility of each Spok Employee to adhere to these standards.

This general company-wide Policy does not override specific policies, procedures, laws or regulations in the local jurisdictions, but instead serves to complement them. If there is a conflict between this Policy and a specific local policy, procedure, law or regulation then this conflict should be referred to the Chief Compliance Officer.

The purpose of this Policy is to set out the responsibilities of Spok, its Employees and Associates in observing and upholding our principles with respect to labor standards and human rights.

## **Policy**

### ***Definitions***

#### **Associate**

Associate means any third party (individual or organization) who is not an Employee but is performing work on behalf of Spok. This includes but is not limited to, consultants, contractors, joint venture partners (and their employees), stakeholders and other business partners.

#### **Employee**

Any person conducting business on behalf of Spok, whether employed in a permanent, casual, fixed term, temporary or agency capacity.

#### **Third Parties**

Third Parties are any individual or organizations with whom Spok or Associates come into contact during the performance of their duties for Spok. This includes but is not limited to, customers (actual or potential), suppliers, health insurers, consultants, advisors, government agencies and other public bodies.

#### **To whom does this policy apply?**

This Policy applies across all Spok subsidiaries as well as all Employees and Associates.

### ***Code of Conduct***

Spok has published its Code of Conduct and Ethics which is communicated to all employees and publicly available on our corporate website. Spok has also published its Vendor Code of Conduct and it is publicly available on our corporate website. The purpose of the Code is to ensure that all Spok employees and those acting on our behalf are aware of the standards of ethical behavior and integrity in all business dealings that are required. These standards both protect us from business risk and support the development of trust and positive relationships with all business associates, colleagues and partners. The Code of Conduct and Ethics outlines the Company's expectations with regards to personal behavior and respect for individuals. Spok employees receive period training on the Code of Conduct.

### ***Community and Stakeholder Engagement***

As a provider of essential healthcare services, Spok is acutely aware of its impact within the communities in which it operates. Spok is committed to engaging with stakeholders within these communities to ensure that it is listening to and learning from their views on how Spok conducts its business, including specifically as this relates to matters of labor and human rights.

### ***Commitment to Local Employment***

Spok is committed to supporting the local communities in which it operates through the priority given to local labor recruitment. To this end, all Spok entities are expected to attempt, in the first instance, to source job applicants from the local community in which the business operates.

### ***Commitment to Equal Opportunity, Diversity and Inclusion***

This policy is not intended to modify in any way the basic employment - at- will relationship of employees of Spok and, as such, it may be modified or discontinued at any time at the discretion of management to meet the changing needs of the Corporation.

As outlined within our Diversity, Equality and Inclusion Policy, Spok strives to maintain a healthy, safe and productive environment which is free from discrimination and harassment based on race, color, deprived backgrounds, poor social status, religion, gender, sexual orientation, age, national origin or disability. In addition, Spok is committed to Equal Employment Opportunity and the continued development and implementation of initiatives to remove barriers that disadvantage any person or group such that everyone is able to compete on equal terms.

Diversity is valued as it assists Spok to meet its objectives, and ensures that its own people, at all levels, reflect the customers and the communities Spok serves.

Spok employees receive period trainings on relevant issues relating to anti-harassment and discrimination.

Spok leadership supports our Diversity and Inclusion Council comprised of Spok employees.

### ***Workplace Health and Safety***

Spok is committed to guarding the health, safety and wellbeing of its Employees, Associates, contractors and visitors by preventing injuries and illnesses in the workplace.

Spok commits to complying with all applicable health and safety laws and regulations in the jurisdictions in which it operates.

Spok's Workplace Health and Safety (WHS) System, Spok's Workplace Health & Safety Policy and SpokSAFE Improvement Program give effect to this commitment and include the continual assessment (and remediation) of potential hazards, and regular measurement of safety key performance indicators.

Spok employees receive period training on relevant safety topics specific to their area(s) of work.

### ***Child Labor***

The use of child labor is prohibited by Spok. 'Child' is defined as any persons under fifteen years of age, unless a national or local law stipulates a higher minimum working age, in which case the higher age will apply. Spok is committed to upholding the Children's Rights and Business Principles through our involvement in the communities in which Spok operates and in the communities where Spok provides charitable assistance.

### ***Forced Labor***

Spok prohibits the use of all forms of forced labor, including but not limited to bonded labor, slave labor and prison labor.

### ***Compensation and Employee Conditions***

Spok operates in full compliance with employment laws and regulations in all jurisdictions in which it operates. This includes but is not limited to laws governing wages, working hours, overtime and statutory employee benefits.

The Company compensates employees competitively relative to the industry and respective local labor markets.

Spok is committed to ensuring that no employee is paid below the legal minimum wage.

Spok recognizes its responsibility to ensure its people are able to enjoy a work-life balance and are provided with opportunities to develop professionally.

### ***Sourcing and Supply***

This policy is not intended to modify in any way the basic employment - at- will relationship of employees of Spok and, as such, it may be modified or discontinued at any time at the discretion of management to meet the changing needs of the Corporation.

We aim to uphold the human rights of all those affected by our business activities, and in particular, of the employees engaged in our supply chain. Spok aims to source all the material used in our supply chain in a way which upholds human rights. We expect our suppliers to engage in responsible sourcing practices, using verified sources where possible. Consistent with this Policy, Spok established a detailed Conflict Minerals Policy addressing this issue.

***Supplier Engagement and Contract Operations***

Spok strives to have our outsourced vendors and key suppliers confirm that they observe practices with protect labor rights and human rights. Spok’s Vendor Code of Conduct outlines the practices expected of Spok vendors.

***Reporting of Noncompliance***

Spok’s Diversity, Equity and Inclusion Policy, Corporate Anti-Harassment and Non-Discrimination Policy, Code of Business and Ethics Conduct, Conflict Minerals Policy and Vendor Code of Conduct are tangible demonstrations of our commitment to our people and the communities in which Spok operates. Central to this commitment is fostering workplaces in which all employees are valued and respected.

If instances of non-compliance with this Policy are suspected, Spok encourages reporting to an immediate supervisor or the Chief Compliance Officers.

Spok encourages openness and will support anyone who raises genuine concerns in good faith under this Policy.

***Training and Communication***

This Policy is communicated to senior management and is made available on the Spok intranet sites. It is the responsibility of senior management to ensure those reporting to them are made aware of (and understand) this Policy.

Additional training of senior management is provided where deemed necessary.

Version	Date	Predecessor Company, USMO, and Spok Detail
1.0	May 2021	Original Document Drafted