

BrightView Human Rights and Labor Policy

I. Scope and Purpose

This Human Rights and Labor Policy applies to all BrightView Holdings, Inc. (“we”, “us”, “our”, or “BrightView”) operations and to all locations and situations where BrightView’s business is conducted. The rules and principles outlined in this Policy apply to all BrightView personnel, including employees, vendors and contractors. Violations may result in disciplinary action in BrightView management’s discretion up to and including termination.

BrightView is committed to the rights of our team members to work in a safe, healthy and productive workplace. This commitment is fundamental to our core values and is further described in our Code of Conduct and other applicable policies and procedures.

BrightView bases its commitments to our team members and communities in which we operate on the International Labor Organization Conventions, the United Nations Universal Declaration of Human Rights, the United Nations’ Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

BrightView’s Board of Directors is responsible for reviewing and overseeing our corporate responsibility policies. Our executive management team, including the Chief Executive Officer, Chief Human Resources Officer, and Chief Legal Officer, oversees the implementation of these policies and coordinates our efforts to identify, address, train, and report on our human rights and labor risks and opportunities and to foster a dialogue on these issues with human rights experts, employees, shareholders, and other stakeholders.

II. Anti-Harassment and Non-Discrimination

BrightView promotes a workplace that values differences and promotes an environment that is inclusive of all people and their unique abilities. A diverse workforce allows us to benefit from multiple viewpoints within our company and help us better relate to business partners, clients, and other stakeholders. Discrimination on the basis of race, religion, color, age, gender, sexual orientation, gender identification or expression, national origin, citizenship, marital status, disability, veteran status, or any other category or characteristic protected by applicable law is prohibited and will not be tolerated under any circumstances. We also prohibit retaliation against any individual who in good faith reports discrimination or asserts their right to be free from such discrimination. The bases for recruitment, hiring, placement, development, training, compensation and advancement at BrightView are qualifications, performance, skills, tenure, and experience.

At BrightView, we treat one another with respect and courtesy. We avoid making disparaging comments about our fellow team members or others. Our company does not permit any form of discrimination or harassment. Harassment does not have to occur in the workplace or involve a BrightView team member to violate our values or the law.

III. Freedom of Association and Collective Bargaining

Drawing on provisions of the International Labor Organization conventions 87 and 98, BrightView respects the rights of employees to join organizations or bargaining groups for representation and to engage in collective bargaining, as permitted by applicable laws in the countries where we do business.

IV. Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. We are committed to providing a safe and healthy workplace and complying with all applicable safety and health laws and regulations, as well as internal expectations that seek continuous performance improvement across key safety metrics. All BrightView employees are required to take the BrightView Safety Pledge and are expected to adhere to the Safety Code of Conduct and participate in daily and weekly safety updates. We take our team members' safety seriously and continually update our trainings, communications, and assessments to ensure that our team is prepared to perform their jobs with minimal risk to themselves or others. BrightView's commitment to the safety and health of our team members extends to all of our facilities and operations, as well as to those of our suppliers, vendors, contractors and clients.

V. International Trade Partners

BrightView may engage the services or require our supplier to engage the services of a third-party inspection firm to ascertain that the international supplier is in compliance with fair labor standards and safety.

VI. Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external physical, verbal or online threats. We continuously evaluate our security profile and enhance security safeguards as needed, while maintaining respect for employee privacy and dignity.

VII. Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

VIII. The Environment

We strive to conduct our operations in an environmentally responsible manner, in compliance with all applicable legal requirements. We recognize the significant implications that environmental stewardship may have for human rights, which we aim to address through a commitment to improve the sustainability of our operations. We recognize the right to water as a fundamental human right and strive to continue to prioritize water conservation efforts in our operations.

IX. Guidance and Reporting for Employees

We strive to create workplaces in which open and honest communications among all employees are valued and respected. BrightView provides annual trainings on this policy, in addition to our Code of Conduct and other applicable policies and procedures, to ensure our team members understand the importance of human rights and the underlying principles of respect, dignity and equality to our business.

The Company is committed to complying with applicable labor and employment laws wherever we and our suppliers operate and adhering to and promoting human rights in accordance with the UN Guiding Principles on Business and Human Rights. Any employee who believes a conflict arises between the language of our policies and the laws, customs and practices of the place where he or she works, or who has questions about our policies or would like to confidentially report a potential violation of our policies,

can raise those questions and concerns with local management or Human Resources. Employees can also anonymously report suspected violations of Company policies and laws online at www.brightviewconcerns.com, or telephone our Concerns Line at 1-877-903-0232. No reprisal or retaliatory action will be taken against any employee for raising their concerns. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any verified violation.