



## Upwork Global Human Rights Policy

### Introduction

Upwork Inc. and its subsidiaries (“Upwork,” “we,” or “our”) are committed to upholding human rights—the basic standards of treatment to which all people are entitled—in everything we do. Respecting human rights is fundamental to our internal workplace policies and programs, and it gets to the core of what our work marketplace is designed to do: help independent talent find work on their terms.

This Upwork Global Human Rights Policy (“Policy”) honors the various policies that make up the [International Bill of Human Rights](#) and aligns with the Guiding Principles on Business and Human Rights, as well as the [ILO Declaration on Fundamental Principles and Rights at Work](#). Upwork complies with all applicable human rights laws in the countries where we operate, and should differences arise between local laws and this Policy, we will follow the law and seek to honor this Policy where possible.

This Policy directly applies to Upwork employees, members of our contingent workforce program, other consultants and independent contractors, officers, and members of the Board of Directors of Upwork Inc. and its subsidiaries. This Policy reiterates Upwork’s expectations of our team members, as outlined in the [Upwork Code of Business Conduct and Ethics](#), our [UK Modern Slavery Transparency Act Statement](#), and our Employee Handbook. Upwork is committed to assessing human rights risks and impacts within our operations on an annual basis.

We seek to partner with individuals and organizations that support our mission, and we encourage our suppliers and customers to operate in accordance with this Policy. We strive to avoid complicity in any harmful or abusive labor practices within our supply chain and/or any connected to the use of our products and services. As our [Supplier Code of Conduct](#) states, Upwork expects our suppliers to respect basic human rights and fair labor practices. To assess and manage human rights risks across our supply chain, Upwork is committed to evaluating

the human rights commitments and employment practices of our suppliers, which include the businesses, consultants, agents, and subcontractors that provide products or services to Upwork. Similarly, Upwork does not permit illegal activity on our platform, and we expect customers to both respect human rights and practice fair labor practices while using the work marketplace. This Policy complements the expectations we have of our customers, as stated in our [Terms of Use](#) and [Commitment to Nondiscrimination, Inclusion, and Respect](#). Upwork's Trust and Security team will assess and mitigate human rights risks across our products and services.

This Policy reflects the input of internal and external stakeholders, and we are committed to consulting our stakeholders on this Policy and its implementation moving forward. Upwork's senior leadership team is responsible for implementing and enforcing this Policy, with oversight from the Nominating and Governance Committee on Upwork's Board of Directors.

### **We Do Not Tolerate Human Trafficking, Forced Labor, or Child Labor**

Upwork is unequivocally opposed to all forms of human trafficking, slavery, servitude, child labor, forced or compulsory labor, and all other trafficking-related activities. We are committed to fully complying with all applicable labor and employment laws, rules, and regulations. We also strive to mitigate the risk of human trafficking and other human rights abuses within our supply chain.

We respect the rights of our employees to agree, voluntarily and without coercion, to the terms and conditions of employment and to freely terminate their employment. We will ensure that mandated working hours are reasonable and provide fair and equitable compensation to our employees for time worked, based on cost-of-living analysis and in accordance with all applicable laws and regulations. Upwork ensures that its employees are of legal working age.

Upwork will comply with all applicable laws concerning the retention of, and workers' access to, employment documentation relating to immigration or work authorization. Upwork always seeks to support workers in understanding the terms of their employment and provide documentation in a language they understand.

For definitions of human trafficking, forced labor, child labor, and modern slavery, visit the International Labor Organization website at <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>.

### **We Support the Health and Safety of Our Workforce**

Upwork's remote-first model and the nature of our business, which relies primarily on knowledge workers, decreases workplace health and safety risks. Nonetheless, we've taken steps to safeguard the well-being of our workforce.

We strictly prohibit violence and threats of violence. This prohibition covers physical violence, threats or aggressive statements, stalking, and intentionally destroying personal and/or Upwork property. We have zero tolerance for possessing dangerous items such as weapons, explosives, or firearms while working or attending any Upwork function, whether in our facilities or off-site. Per our Employee Badge and Access Control policies, we expect all team members who work in or visit our offices to maintain the safety and security of our offices and care for our shared assets. Our Candle in the Wind program supports team members who may be experiencing an unsafe or unhealthy home work environment.

We support the health and well-being of our team members and believe that enabling them to work remotely and manage flexible work schedules is crucial. In addition to comprehensive health benefits, we provide employees with guidance on ergonomic practices and workstations. To avoid and respond effectively to workplace illness and injuries, we maintain an Injury and Illness Prevention Program (IIPP) and emergency preparedness plans. Although we try to identify and correct every potential workplace hazard, we rely on employees to alert us to dangers and report any workplace health or safety issue, concern, or incident.

### **We Do Not Tolerate Harassment**

Upwork does not condone any form of harassment, including but not limited to verbal, physical, or visual harassment or bullying. Harassment on the basis of a protected characteristic, including race, color, religion, sex, sexual orientation or gender identity, pregnancy, national origin, age, disability, or genetic information, is not only incompatible with our values but is also illegal. We are committed to investigating reports of harassment or bullying to help us maintain a healthy, inclusive work environment.

### **We Support Equal Opportunity and Do Not Tolerate Discrimination**

Upwork provides every employee equal opportunities without regard to characteristics and statuses protected by applicable law. Upwork does not permit unlawful discrimination against anyone based on nationality, race, ethnicity, sex, gender, gender identity, sexual orientation, disability, veteran status, marital status, or other similarly protected characteristics. We do not permit any language or conduct that is illegal, threatening, prejudiced, hateful, or unlawfully discriminatory or harassing. Upwork's vision for diversity, inclusion, and belonging is dignity, purpose, community, and fairness at the center of every working moment. To learn more about how we champion diversity, inclusion, and belonging at Upwork, visit [our website](#).

## **We Recognize the Right to Freedom of Association and Collective Bargaining**

Upwork respects the rights of workers to freely associate, organize, and bargain collectively in accordance with applicable laws and customs of the countries in which they are employed. Upwork encourages our team members to communicate openly with management regarding working conditions without fear of retaliation, harassment, intimidation, penalty, or interference. As stated in our [Supplier Code of Conduct](#), Upwork requires our suppliers to comply with the obligation to permit their workers to freely associate.

## **We Enable Stakeholders to Raise Concerns and Do Not Tolerate Retaliation**

Upwork values transparency and we encourage our team members and business partners to report violations of this Policy and/or unlawful or unethical behavior. Reports can be made confidentially or anonymously through Upwork's [Ethics Reporting Platform](#), which is administered through a third party and is available 24 hours a day, 7 days a week. Upwork employees and members of our contingent workforce may also report concerns to their manager, their Human Resources business partner, a member of the Legal team, or an Ethics Advisor, all of whom have an obligation to report to the Compliance Officer (or their designee) any suspected violations they are informed of or witness directly. Learn more about Upwork's Speak Up program in our [Code of Business Conduct and Ethics](#).

We will take all necessary steps to investigate and rectify any known breach of this Policy. If warranted by the nature of the suspected allegation, Upwork will conduct a prompt, impartial investigation by qualified personnel. When suspected violations are substantiated, we will take appropriate action, which can include mandatory training, warnings, or termination of employment or any other business relationship.

Upwork does not permit retaliation. Retaliation occurs when an adverse action is taken against someone for (i) reporting a concern about a violation or suspected violation of Upwork policy or applicable law, (ii) assisting someone else in reporting such a concern, or (iii) participating in an investigation. Some examples of retaliation include being denied a promotion because of reporting an ethical violation or suspected violation, and being terminated or demoted for assisting someone else in reporting a concern. Upwork team members may find additional information in our [Whistleblower Policy](#).

For more information about our efforts to support human rights, visit Upwork's ESG Reports Hub at [www.upwork.com/about/our-impact/reports-hub](http://www.upwork.com/about/our-impact/reports-hub).

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