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TITLE:	Diversity, Equity and Inclusion Policy		

Purpose of the policy

This document establishes our commitment to fostering a workplace where all employees can thrive. Our key objectives are promoting fairness and equal opportunities for advancement, cultivating a workplace culture of respect and belonging, enhancing organizational performance through diverse perspectives, and attracting and retaining talented individuals who seek inclusive employers. Through these efforts, we ensure compliance with legal and regulatory requirements while protecting Tosca from potential liabilities.

Policy scope

The requirements described in this policy apply to all Tosca locations and outline expectations for our critical suppliers.

Definitions

Diversity, Equity & Inclusion (DEI): A workplace commitment to eliminate discrimination and bias while fostering respect, embracing differences, and empowering all team members to reach their full potential.

Diversity: The presence of differences among our workforce, including but not limited to backgrounds, experiences, perspectives, talents, and ways of thinking.

Equity: The guarantee of fair access, opportunity, and advancement for all team members through consistent standards, while actively identifying and eliminating barriers that prevent full participation.

Inclusion: An environment where all team members feel welcomed, respected, supported, and valued within the organization.

Reasonable Accommodations: Personal circumstances requiring workplace flexibility or support, including disability, health conditions, caregiving responsibilities, or other situations as approved by Human Resources.

Responsibilities

The Global Head of Sustainability oversees the DEI policy document, working with subject matter experts to update objectives and targets annually. They monitor implementation progress through the KPI dashboard and ensure alignment with company goals.


Regional VPs of Human Resources integrate DEI principles throughout the employee lifecycle, from recruitment to career development. They oversee confidential ethics reporting processes, manage investigations with legal counsel, implement DEI training programs, and set measurable targets to drive progress.

Senior leadership ensures team compliance with DEI training requirements and enforces a zero-tolerance policy regarding discrimination and harassment. They model inclusive behaviors and hold their teams accountable for maintaining a respectful workplace.

Responsible Department(s)	Prepared and Reviewed by	Approved by	Date
SUST	Karin Witton	Sr Leadership	9/30/2024

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Team members must complete all assigned DEI training, including the Code of Conduct, and actively contribute to an inclusive workplace by respecting the dignity and diversity of all colleagues.

Objectives and Targets

Objectives and Targets

- Annual refresher training for all staff provided on: Tosca Code of Conduct, Anti-discrimination, anti-harassment and non-retaliation, and Human Rights.
- Review DEI workforce representation data annually to establish specific, measurable objectives for increasing diverse representation across all organizational levels, with targets to be set based on current demographics, industry benchmarks, and regional labor market availability.
- Develop and implement supplemental training programs and mentorship initiatives that address emerging organizational needs, including but not limited to performance evaluation practices and career development support, with specific programs to be determined based on strategic priorities and business requirements.
- Create a process for building accessibility features into workplace facilities, technologies and communications channels to better enable/ support team members with disabilities and ability to provide equal opportunities by end 2026.
- Maintain and communicate annually on an Ethics Hotline which is accessible for all staff and external stakeholders to report incidents or concerns in a confidential manner.
- Implement and maintain an equal pay scheme for all employees.
- Implement feedback mechanisms including an annual employee engagement survey and/or pulse surveys by end 2024.
- Support team member engagement with the local community through providing a designated amount of money to each facility to spend on philanthropic endeavors every year beginning 2025.
- Create a culture committee / engagement committee approach in each Region to facilitate engagement of Team members based on inclusion and exchanging an understanding of the different cultures (meaning ethnicity, gender, sexual orientation, religion, race, parenthood, gender reassignment, national origin, age, religion or belief, disability, veteran status, social condition, or any other class protected by law) which exist within the company by end 2025

Reporting procedure


In order to track the impact of the improvement measures against the stated targets the following data will be monitored:

- Headcount (overall and by level)
 - Gender representation (overall and by level)
 - Racial/ethnic representation (overall and by level)
 - Age distribution (overall and by level)

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- New Hire Demographics (overall and by level)
 - Gender representation (overall and by level)
 - Racial/ethnic representation (overall and by level)
 - Age distribution (overall and by level)
- Promotion Demographics (overall and by level)
 - Gender representation (overall and by level)
 - Racial/ethnic representation (overall and by level)
 - Age distribution (overall and by level)
- Turnover Demographics (overall and by level)
 - Gender representation (overall and by level)
 - Racial/ethnic representation (overall and by level)
 - Age distribution (overall and by level)
- Employee Experience
 - Engagement survey scores by demographic
- Pay Equity
 - Compensation by gender
 - Compensation by race/ethnicity
- Training & Development (completion rates)
 - Code of Conduct
 - Anti-Harassment & Retaliation
 - Human Rights
- Compliance
 - Discrimination complaints
- Supplier Diversity
 - % of diverse suppliers

Note: Job Level is defined as Executive, Senior Leadership (VPs), People Manager, Functional Manager, Supervisor, and Individual Contributor

Management Review

To ensure that the formulated policy is in accordance with Tosca's most recent strategy and operations, the objectives and targets will be reviewed on an annual basis. The review will include updating of the DEI approach, objectives and targets as determined by developments in the relevant areas as well as changes in circumstances, regulations and/or legal modifications.

Based on the monitoring results, action plans will be formulated, and future goals set as part of the annual policy review.

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