



Diversity, Equity & Inclusion Policy

Group Environment Social & Governance Department

February 2025

CONTENTS

Purpose	3
Scope	3
Definitions	4
Commitments and Objectives	4
Implementation and Review	5
Responsibilities	6
Feedback & Complaints	6
Conclusion	6

At Circet, we are committed to fostering a diverse, equitable, and inclusive workplace where all employees feel valued, respected, and empowered to contribute to our success. With a global internal and external workforce of more than 20,000 employees, we recognize that diversity, equity, and inclusion are essential to driving innovation, improving customer service, and achieving sustainable growth.

PURPOSE

The purpose of this Diversity, Equity & Inclusion (DE&I) Policy is to outline our commitment to creating and maintaining a diverse, equitable, and inclusive environment in the workplace with preventing discrimination and harassment. This policy provides a framework for promoting DE&I across all levels of the organization and in its supply chain and ensures that practices reflect our values and respect specific national or international regulations, and sectorial and national initiatives that have been created to act on this particular issue.

Key Sustainability Issues

- Non-discrimination in the workplace
- Equal treatment of different gender groups as well as other underrepresented groups
- Non-discrimination against ethnic minorities in places where these positions are considered low-skilled, particularly in high-risk countries



SCOPE

This policy applies to all Circet Group companies. It is implemented in all geographical areas where Circet operates. It applies to all potential employees, employees, contractors, consultants, and any other individuals or entities acting on behalf of Circet globally.



DEFINITIONS



- **Diversity:** The presence of differences that may include gender, ethnicity, neurodiversity, age, sexual orientation, disability, religion, socioeconomic status, and other attributes.



- **Discrimination:** It is defined as different treatment given to people in hiring, remuneration, training, promotion, termination; based on specific characteristics of a person.



- **Equity:** The fair treatment, access, opportunity, and advancement for all people, while striving to identify and eliminate barriers that have prevented the full participation of some groups.



- **Discrimination criteria:** Ethnicity, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age are some of the criteria.



- **Inclusion:** The practice of creating environments in which any individual or group can be and feel welcomed, respected, supported, and valued to fully participate.



- **Harassment:** Harassment refers to a form of repeated and persistent abusive behavior aimed at degrading, humiliating, intimidating or controlling a person in the work environment. It may include physical, sexual, psychological and verbal abuse.

COMMITMENTS AND OBJECTIVES

1. Commitment to Diversity, Equity, and Inclusion

We embrace and encourage our employees' differences in age, disability, ethnicity, family or marital status, gender, language, national origin, physical and mental ability, political affiliation, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

We are committed to an inclusive workplace where barriers to participation and advancement are minimized and where everyone has the opportunity to contribute to their fullest potential.

2. Leadership and Accountability

- Our leadership team is responsible for setting the tone at the top and fostering a culture of DE&I.
- All leaders and managers are accountable for implementing this policy and ensuring that their teams uphold DE&I principles in their daily operations.

3. Recruitment and Hiring

- We strive to attract, recruit, and retain a diverse workforce.
- We use fair and unbiased recruitment practices to ensure all candidates have equal opportunity to join our team.
- We provide training to hiring managers to recognize and mitigate unconscious biases.

4. Career Development and Advancement

- We offer equal access to training, development, and advancement opportunities.
- We actively work to identify and remove barriers to career progression for underrepresented groups.
- We provide training to all management level positions that might influence promotion decisions to avoid perceived discriminatory practices.

5. Work Environment

- We promote a workplace culture that is respectful, inclusive, and free from discrimination, harassment, and retaliation.
- We encourage open dialogue and provide safe spaces for employees to express their concerns and ideas regarding DE&I.

6. Education and Training

- We provide ongoing DE&I education and training to all employees to build awareness, enhance understanding, and foster inclusive behaviors.
- Training programs cover topics such as cultural competency, unconscious bias, and inclusive leadership.

7. Supplier Diversity

- We are committed to working with a diverse range of suppliers and business partners.
- We encourage the inclusion of minority-owned, women-owned, veteran-owned, LGBTQ+-owned, and disability-owned businesses in our supply chain.
- We encourage suppliers to meet DE&I requirements.

8. Community Engagement

- We support and participate in community initiatives that promote diversity, equity, and inclusion.
- We encourage our employees to volunteer and engage in activities that reflect our DE&I values.

9. Measurement and Reporting

- We regularly measure and report on our DE&I progress.
- We use data-driven insights to inform our DE&I strategies and initiatives.
- As far as legally allowed, we hold ourselves accountable by setting measurable DE&I goals in each country in which we operate.
- We aim to have 30% of women in the senior management by 2030 and transparently share our progress with stakeholders.

IMPLEMENTATION AND REVIEW

- This policy is communicated to all employees and stakeholders.
- Each Circet country, in conjunction with the relevant stakeholders, will oversee the implementation and progress of this policy.
- Regular reviews of this policy are conducted, at least every year, to ensure it remains relevant and effective.

RESPONSIBILITIES

Everyone has a responsibility to give full and active support, ensuring:

- The policy is understood and implemented
- Their behavior always takes into account the uniqueness of others
- Everyone is treated with respect, courtesy and dignity
- Behaviour not in accordance with the policy is challenged and acted upon

The country CEO is responsible for:

- The implementation and monitoring of this policy
- Ensuring that other organizations working with Circet, work according to the requirements of the Circet DE&I policy and legal requirements
- Ensuring that our employment policies, procedures and practices are implemented in accordance with the company's Diversity, Equity & Inclusion Policy

The Board of Directors have a responsibility for:

- Promoting equality, diversity and inclusion
- Ensuring the business meets all its duties under the legislation and that effective policies and procedures are established and effectively monitored

All employees of Circet are responsible for:

- Operating within this policy at all times
- Advancing equality of opportunity and fostering good relations
- Challenging inappropriate language and behaviors
- Completing mandatory anti-discrimination and anti-harassment trainings

FEEDBACK & COMPLAINTS

Any employee or applicant for employment who believe they have experienced or observed behaviors that fall short of our DE&I Policy should seek to provide feedback, advice and support from its local Management Team, trusted person or Human Resources Department.

Any applicant, employee or non-employee worker or any other person working for Circet may raise their concerns through the Grievance Policy or the Group Whistleblowing procedure linked here: [Report a concern](#) | [Circet Corporate International](#).

CONCLUSION

At Circet, diversity, equity, and inclusion are not just initiatives but are integral to who we are and how we operate. We are committed to creating a workplace where everyone feels valued and has the opportunity to thrive.

By fostering a diverse, equitable, and inclusive workplace, we believe that we can better serve our customers, communities, and each other, ensuring a brighter future for all.

