



We foster an inclusive culture

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# TITAN Group Diversity, Equity and Inclusion Policy

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v1.2

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## Purpose

In TITAN, diversity, equity and inclusion (DE&I) are core to our culture, strategy and every-day working practices. We are committed to creating an environment where all differences are valued and where everyone has the opportunity to flourish and experience a sense of belonging. We recognize that achieving our aspirations for DE&I in the work we do and the way we work is an on-going process and one that requires awareness, action, responsibility and accountability from everyone in our business. This policy sets out our principles, definitions, scope and approach to diversity and inclusion.

## Definitions

**Equity:** Equity in TITAN is part of our Values. It means ensuring all our employees have an equal opportunity to perform, contribute and grow in our company. It also means avoiding disadvantage, discrimination or bias based on any diversity characteristic. In promoting equity within TITAN, we are sensitive to and respect the local laws of the individual countries we operate in.

**Diversity:** In TITAN we value the strengths that diversity brings to our business and aspire to increase it. Diversity in TITAN refers to any characteristic that makes us unique. It includes but may not be limited to:

- **Identity or Demographic Diversity**, including age, disability, gender and gender identity, ethnicity and race, religion and spiritual beliefs and non-beliefs, sexual orientation, national origin;
- **Experiential Diversity**, such as skills, competences, education, and background;
- **Cognitive and Neuro Diversity**, such as ways of thinking, learning, personality and workstyle.

**Inclusion:** We aspire to create an environment within TITAN where everyone has a strong sense of belonging and experiences inclusion. Inclusion is the extent to which individuals feel valued, respected, safe and accepted.

**Bullying & Harassment:** This is behavior that makes someone feel intimidated or offended. This can include, for example, unfair treatment, picking on, undermining someone, or denying someone training or promotion opportunities. It includes bullying and harassment in any circumstances and by any means, for example, face-to-face, by letter, by email, on virtual platforms or by phone. In TITAN, we adopt a zero- Titan Group Diversity, Equity and Inclusion Policy Page 3 of 6 v1.1 tolerance approach to bullying and harassment and comply with the requirements of local legislation with respect to bullying and harassment as a minimum.

## Scope and Application

The Policy applies to **TITAN S.A. and to the entities that it owns or in which it holds a majority interest (TITAN Group).**

The principles of the Policy are also expected to be applied by TITAN Group's partners and business associates, such as contractors and suppliers.

In implementing the Policy, we are subject to the laws of the countries in which we operate and we are committed to comply with all such applicable laws. Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. Where local law prohibits us from upholding certain aspects of the Policy, we comply with these local laws while seeking to apply best practice.

Business Units and/or regions may differentiate DE&I practices to adapt to their individual needs, but only so long as they do not contradict any of the Group Policy statements, or omit important aspects of the Group Policy.

DE&I is embedded into all relevant policies, strategies and plans. This policy should be read in relation to:

- The TITAN Group Code of Conduct, Corporate Social Responsibility Policy, Human Rights Policy and Whistleblowing Policy.
- Our Environmental, Social and Governance (ESG) strategy which sets out our commitment to cultivating an inclusive culture with equal opportunities for all our people to grow professionally within a safe and healthy work environment.

## Principles

1. We value all our employees and follow business practices that **do not tolerate discrimination, promote equal opportunity and diversity, equity and inclusion**, in recruitment, employment, development, talent management and reward and are consistent with national laws and international voluntary guidelines, such as the UN Universal Declaration of Human Rights, **International Labour Organization's Conventions on Labour and the UN Global Compact**.
2. Everyone in TITAN can expect to be valued and respected for who they are. **We do not tolerate discrimination, bullying or harassment.**
3. We recognize and are committed to **the on-going focus, learning, and continuous monitoring and review work** that is required to attain and sustain diversity, equity and inclusion.
4. Diversity, equity and inclusion are **everyone's responsibility** in TITAN, in their actions and behaviors every day.
5. We are **committed to achieving equal outcomes** in employment and understand that this may require different actions for different employees, considering individual needs, experience of past discrimination and / or discrimination in wider social, economic and education systems.
6. Understanding and overcoming the barriers to diversity, equity and inclusion requires **a collaborative approach and we are committed to involving diverse people and perspectives** from across our business in ensuring our actions make a positive impact.

## Equal Pay

We are committed to ensuring equal pay for work of equal value and avoiding unfair discrimination in how we reward our people in TITAN on the basis of gender, race/ethnicity and disability. We will respond promptly to any complaints in relation to equal pay and where any disparities are found, we are committed to putting a plan in place to restore equal pay.

## Reasonable Adjustments

A 'reasonable adjustment' or 'accommodation' refers to modifications of equipment, workplace environment, job content, the way things are done, as well as working time and location for employees with different needs so that they can carry out their role or apply for a position in TITAN. This is intended to support employees with disabilities, who are pregnant, have care responsibilities or changing health conditions that require adjustments to enable them to do their job. We are committed to carrying out adjustments where it is possible or reasonable, taking into consideration: (1) the impact the adjustment will make in reducing the disadvantage experienced by the employee, (2) practicality of the changes required (3) cost and affordability and (4) impact on others including possible harm to their health and safety.

## Management and Responsibilities

Diversity, equity and inclusion issues can be encountered in any personal interaction we may have as managers, supervisors, colleagues or business partners and in the decisions we make. Therefore, all TITAN Group employees are required to read, understand and make sure that their actions comply with the Policy, and are encouraged to participate in any training programs, workshops or events provided internally to support equity, diversity and inclusion.

## Governance and Monitoring

A Group DE&I Council has been established, positioned to actively sponsor diversity, equity and inclusion at Board and Management level and across the Group. Holding the responsibility for TITAN Group's DE&I strategy, global initiatives, internal and external communication, and evaluation of progress on goals, the Council reports to the TITAN Board of Directors, through its Chair.



Countries are encouraged to set up DE&I Councils - or include DE&I as an added accountability to the Country Management Committees - acting as active sponsors at a local level and driving implementation of local solutions to improve DE&I, in a consistent way with the Group's DE&I strategy, while reflecting local needs, varying regulatory contexts and different starting points.

## Communication

TITAN Group's DE&I Policy must be communicated to all employees as well as suppliers, contractors, agents and business partners at the outset of our relationship with them. We communicate our DE&I objectives, action plans and progress internally and externally at least annually.

## How to raise a concern

If you have experienced or witnessed behavior or actions that contravene our DE&I policy or if you have a request for a reasonable adjustment / accommodation, you should discuss with or report this immediately to:

- Your line manager and/or
- Your HR business partner
- EthicsPoint Titan Group Diversity, Equity and Inclusion Policy Page 6 of 6 v1.1

If you have any questions or require clarifications with regard to the Policy, please contact your line manager and/or your local HR representative.

## Violations

Breaches of this Policy may result in disciplinary action, including termination of employment, according to local laws and regulations. Where an action is also in breach of the law, the employee may be subject to prosecution under civil or criminal law. Depending on the circumstances, the employee who contravenes the Policy may be offered training and objectives that will be closely monitored, to change actions and behaviors.

## Administration and Updating of the Policy

The Group HR Department is responsible for the administration and periodical review and update of this Policy. Revisions will be submitted for approval to Group Executive Committee.