



Diversity, Equity and Inclusion Policy

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Policy owner:	Chief Executive Officer
Approved by:	Board of Directors

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A. Purpose and Scope

This Diversity, Equity and Inclusion Policy (the “**Policy**”) establishes the view, approach and responsibilities of Itafos Inc. and its subsidiaries (collectively, the “**Company**”) related to diversity, equity and inclusion matters. This Policy applies to all directors, officers, employees and contractors of the Company.

Any Policy exceptions must be documented in writing and approved by the Policy owner, unless specifically stated otherwise. Subsidiaries of the Company may supplement this Policy with additional guidelines or requirements as long as such guidelines or requirements do not conflict with this Policy.

This Policy should be read in conjunction with the Code of Ethics and Business Practices, the Human Resources Policy, the Whistleblower Policy and any other applicable policies of the Company. In the event of any conflict between this Policy and the Code of Ethics and Business Practices, the Code of Ethics and Business Practices shall prevail.

If you have any questions about this Policy, contact the Policy owner directly or email the Legal Department at legal@itafos.com.

B. General Statement

The Company is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion throughout its business and operations.

Our employees are the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and achievement as well.

We embrace the differences and characteristics that make our employees unique. We foster a workplace environment that promotes fair treatment; considers circumstances; provides an equal opportunity for success; and recognizes the importance of letting everyone be seen, heard, and respected.



What are some differences between diversity, equity and inclusion?

Diversity, equity and inclusion (often referred to as “DEI”) are concepts that companies and other organizations often use together given their interconnectedness and how, in combination, their true impact emerges within the workplace. In simple terms:

- Diversity relates to who is represented in the workforce. We may often think of diversity in terms of race or gender, but it also means diversity in age, ethnicity, beliefs, abilities and even how people learn and think.
- Equity refers to the fair and merit-based treatment of all people and considers unique circumstances.
- Inclusion relates to how an organization embraces all employees and enables them to make meaningful contributions.

The Company's diversity, equity and inclusion activities are focused on the ongoing development of a work environment that encourages:

- respectful communication and cooperation between all employees;
- teamwork and employee participation, permitting the representation of all groups and employee perspectives;
- work/life balance to accommodate employees' varying needs to the extent practical and possible considering the overall business needs and circumstances and otherwise as allowed or required by laws, rules and regulations; and
- employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity, equity and inclusion.

C. Responsibilities

All Company employees have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other Company-sponsored events.



Can you elaborate on what you mean by “expected to exhibit conduct”?

As we know, conduct is the manner or way in which someone behaves, especially on a particular occasion or in a particular context. Conduct can be exhibited or manifested in many ways including not just how we act or what we actually say, but by how we implicitly behave via body language and other non-verbal communication. Examples include volume or tone of voice, how we treat personal space, facial expressions and hand gestures.

All employees are also required to attend and complete Company-sponsored diversity, equity and inclusion awareness training to enhance their knowledge of this responsibility.

Any employee, regardless of tenure or position, that is found to have exhibited any inappropriate conduct or behavior against others will be subject to a disciplinary review process – consistent with Company business practices and regulatory requirements – and may be subject to disciplinary action up to and including termination.

Employees who believe they have been subjected to any kind of discrimination that conflicts with this Policy and related initiatives should seek assistance from a supervisor, Human Resources, the Legal Department or the Policy owner.

Further, you are encouraged to ask questions and expected to report concerns of suspected violations of this Policy. Refer to the Whistleblower Policy for more information related to reporting concerns.

The Company's Board of Directors ("**Board**") has reviewed and approved this Policy.

The Governance and Nominating Committee of the Board is responsible for reviewing this Policy periodically and presenting to the Board any necessary or contemplated updates to this Policy.

The Compensation Committee is responsible for researching and identifying trends in employment matters such as equity, diversity, and inclusion.

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