



# DIVERSITY, EQUITY & INCLUSION POLICY

## EFFECTIVE DATE

July, 2023

## PURPOSE

The Diversity, Equity & Inclusion Policy sets out the principles and requirements by which Novolex will enhance diversity, equity and inclusion throughout the organization.

Our DE&I strategy is based on five strategic pillars designed to work in tandem. .

1. Leadership Commitment & Accountability: Have leaders commit to and be accountable for actions, and regularly report progress.
2. Recruitment: Attract the best diverse talent to Novolex.
3. Growth & Development: Advance efforts that increase the retention and advancement opportunities for the diverse talent within Novolex.
4. Inclusive Culture: Foster a culture where our people feel respected, accepted and supported at Novolex.
5. Supplier Diversity: Develop and build supplier partnerships that reflect greater diversity.

## SCOPE

This policy applies to all Novolex employees, except as otherwise prohibited by national, state, or local law or regulation.

The policy is applicable—but not limited—to related policies and procedures applicable to all aspects of employment, including direct and indirect unequal treatment, recruiting, hiring, evaluation, training, discipline, work and service assignments, working conditions, career development, compensation, promotion, and termination.

The Chief Human Resources Officer is the policy owner and responsible for overseeing the implementation, administration, and interpretation of this policy.

## DEFINITIONS

**Manager:** Anyone who has at least one direct report.

## POLICY STATEMENT

### Diversity, Equity & Inclusion

It is the policy at Novolex to provide a workplace that is diverse, equitable and inclusive.

**Diversity** is the unique differences, both visible and invisible, in the identities, experiences, abilities and backgrounds of our people. We are creating a workforce that represents the communities in which we operate.

**Equity** is fair treatment for our people. We are creating a workplace where there are equitable opportunities to learn and grow.

**Inclusion** is a safe workplace where our people feel respected, accepted and supported. We are creating a culture where all feel included regardless of identity or background.

### Equal Employment Opportunity

The Novolex policy to foster a diverse, equitable and inclusive workplace is underpinned by our commitment not to discriminate on the basis of sex, gender, race, creed, color, nationality, citizenship, ethnicity age, marital status, disability, religion, political affiliation or opinion, sexual orientation, socioeconomic status, or any other basis protected by applicable international, national, state or local laws. We do not tolerate unlawful discrimination and differential treatment of any kind.

## PROCEDURES

The responsibility of effectively implementing this policy requires the understanding and participation of both employees and managers.

### Employee Responsibilities

At Novolex, we believe that everyone is responsible for contributing to our commitment to provide a work environment that provides diversity, equity and inclusion. It requires purposeful action every day and is reflected in our values:

## PROCEDURES CONTINUED

- Put safety first every day. The well-being of our employees, customers, and communities is our top priority, and we are committed to a safe and healthy work environment. This means prioritizing safety in all of our actions and decisions, and continuously working to identify and mitigate potential hazards.
- Behave with integrity and humility, treating everyone fairly and with respect. We hold ourselves to the highest ethical standards and work to ensure everyone is respected, accepted, and supported. This means being accountable for our actions, and doing the right and fair thing, even when it's difficult.
- Embrace collaboration to support diverse opinions. We believe that working together as a team is the key to our success. This means valuing the unique differences of the people around us, actively seeking out the perspectives of others, and to ensure everyone feels included.
- Approach every task with a commitment to excellence and a winning, entrepreneurial mindset. We strive to be the best in everything we do, from the products and services we offer to the way we treat our customers, business partners and each other. This means continuously improving ourselves and our work, and never being satisfied with mediocrity.
- Understand and act on our responsibility as environmental stewards. We are committed to constantly innovating and championing sustainable products, manufacturing practices and lifestyles. This means working with each other, our neighbors, customers, and other stakeholders to support a circular economy.

We are confident that when the letter and spirit of our values are adhered to, we can create an inclusive workplace where differences will be welcomed and contribute to our success.

### Manager Responsibilities

Managers are accountable for specific DE&I responsibilities and for achieving DE&I outcomes as part of their job performance. These responsibilities include but are not limited to:

- Mitigating potential unconscious bias in employment decisions and talent practices including performance and development, compensation, and hiring.
- Drawing from a broad pool of talent in order to inclusively reach candidates and create a workforce that reflects the communities in which we live.
- Creating an inclusive and safe workplace where our people feel respected, accepted and supported.
- Cultivating a culture where there are equitable opportunities to learn and grow.
- Providing reasonable accommodations for qualified individuals with a disability and for those with needs related to their religious observance or practices in recognition of personal religious expression.
- Engaging a Human Resources Business Partner when becoming aware of an employee who may be subject to discrimination, harassment or bullying.
- Addressing other behaviors not consistent with this or other policies, or with applicable laws or regulations relating to equal opportunity, diversity, equity or inclusion.

## RELATED POLICIES

- Employee Code of Conduct Anti-Harassment Policy
- Supplier Diversity Policy
- Anti-Discrimination Policy
- Human Rights Policy

## GRIEVANCE MECHANISMS

Employees are encouraged to report concerns related to the application of this Policy to their manager or other members of Company leadership. The Novolex Ethics Hotline is also available for employees who prefer to report concerns anonymously. The 24-hour reporting system is available to all employees and assures confidentiality and no risk of retaliation to protect anyone who raises a concern in good faith.

Reports may be made online at [ethics.novolex.com](https://ethics.novolex.com) or by phone using the numbers below.

USA and Canada 800-461-9330  
Mexico 800-681-6945  
Ireland 800-904-177  
The Netherlands 0-800-022-0441  
United Kingdom 0-808-189-1053

### Right to Terminate or Amend Policy

Novolex reserves the right to modify, suspend, change or terminate this Policy at any time, in accordance with local law. This policy does not create any contractual rights or obligations, whether expressed or implied. Subject to local law, the English-language version will prevail.



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