



THEON
INTERNATIONAL
Advanced Optronics

Diversity, Equity & Inclusion Policy

Date of entry into force

19.01.2024

Edition

1st

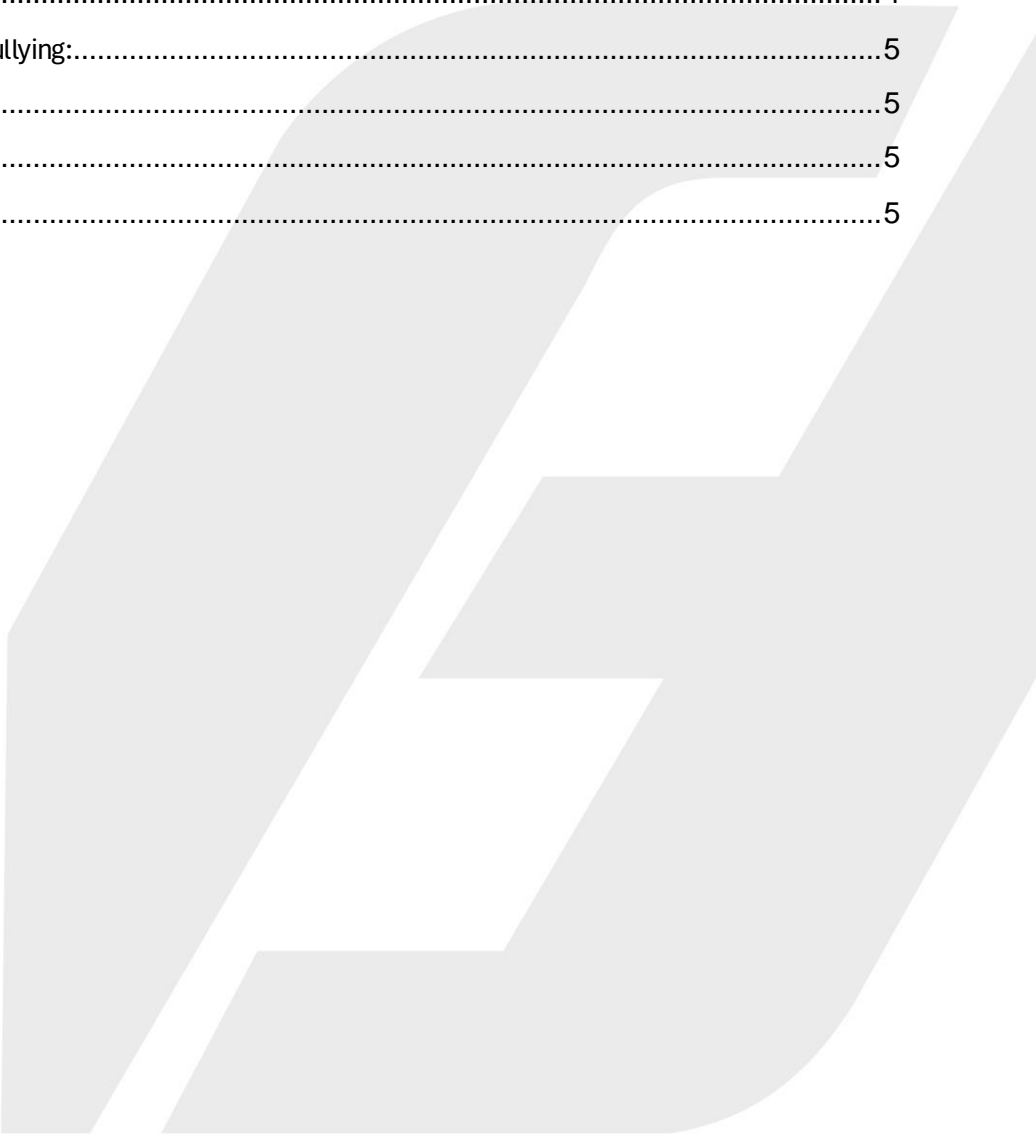


THEON

INTERNATIONAL

Advanced Optronics

INTRODUCTION.....	3
Diversity, Equity & Inclusion Definition:.....	3
Employee Responsibilities:.....	4
People Leader Responsibilities:	4
Discrimination, Harassment and Bullying:.....	5
Reporting Inappropriate Conduct:	5
Prohibition of Retaliation:	5
Consequences:	5



INTRODUCTION

The Company “Theon International PLC” (hereinafter referred to as the “Company”) and its subsidiaries (hereinafter referred to as “Theon Group”) are equal opportunity employers. The Company is committed to workforce diversity, creating equal opportunities and advancing a culture of inclusion where everyone feels valued and able to achieve their full potential. A culture of belonging is about uniting different backgrounds, beliefs, abilities and experiences in an environment where everyone feels valued and works together to achieve meaningful outcomes. Any form of discrimination shall be avoided, and to contribute effectively, individuals must actively promote understanding, empathy and open communication. This culture outlines the responsibility to create an inclusive environment and respect the dignity and diversity of all people. It guides how the company engages with one another and inspires in order to take purposeful action to support the customers, employees and local communities. This makes diversity, equity and inclusion (DEI) everyone’s responsibility.

The Diversity, Equity and Inclusion (DEI) Policy, sets out the principles and requirements by which the Company will enhance DEI throughout the organization and Theon Group. Therefore, the provisions included herein shall apply to the Company and to the Theon Group. DEI Policy is applicable—but not limited—to the practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs, layoffs, terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity. This policy applies to all employees and anyone conducting work on behalf of the Company and of Theon Group.

The DEI strategy is guided by internal and external insights, global best practices and continual employee feedback, which together remind the Company that while diversity changes by location, inclusion is the same everywhere. This approach allows the Company to continually evaluate its Global DEI strategy to ensure it remains relevant to meet the changing demands of the communities it serves.

POLICY GUIDELINES

Diversity, Equity & Inclusion Definition:

A place where everyone individually and as members of a group has a responsibility to accelerate progress, and where all people are accountable and empowered to drive change.

Diversity is about each individual’s unique perspective. Diversity includes characteristics such as age, ethnicity, gender, intellectual and/or physical ability, cultural background, sexual orientation, gender identity. Moreover, diversity refers also to less visible aspects, such as education, socioeconomic background, faith, marital status, family responsibilities, way of thinking, experience and working styles.

Equity is tailoring tools and resources to meet the unique needs of each individual and continuously improving our systems and processes, so everyone has the opportunity to reach its full potential.

Inclusion is creating a deep sense of belonging, where each individual is valued, each one's ideas are heard, and everyone advances this culture for everyone.

Employee Responsibilities:

DEI is everyone's responsibility. It requires purposeful action every day. Every employee is responsible for:

- Respecting the dignity and diversity of all people.
- Creating an inclusive environment that is free from discrimination, harassment and bullying.
- Enhancing their awareness of potential unconscious bias and how that might hinder the ability to be more inclusive and collaborative with one another.
- Focusing on conscious inclusion to be more intentional with their actions to drive diversity, equity and belonging.

People Leader Responsibilities:

Additionally, people leaders are accountable for specific DEI responsibilities and for achieving DEI outcomes as part of their job performance. These responsibilities include but are not limited to:

- Ensuring that employment-related decisions are free from discrimination.
- Setting individual DEI goals to foster diverse representation and an inclusive environment within their teams.
- Engaging in conscious inclusion and other behaviours that promote equity.
- Committing to an individual goal as part of annual goals- and objectives-setting to help Theon International PLC to meet its DEI responsibilities.
- Mitigating potential unconscious bias in employment decisions and talent practices (including performance and development, compensation, hiring).
- Drawing from a broad pool of talent in order to inclusively reach talent, create diverse slates and, ultimately, a workforce that reflects the communities we serve.
- Providing reasonable accommodations for qualified individuals with a disability and for those with needs related to their religious observance or practices of personal religious expression. A reasonable accommodation depends on the facts and circumstances and is addressed on a case-by-case basis.
- Creating an inclusive and safe work environment that supports DEI and behaviors. This includes:
 1. Ensuring a work environment that is free from discrimination, harassment and bullying.
 2. Consistently displaying inclusive leadership behaviors, valuing all perspectives and listening to diverse points of view.
 3. Role modeling inclusive and respectful behavior in the work environment and all work related activities.
 4. Encouraging employees to collaborate, make suggestions and respect and listen to diverse opinions.

Discrimination, Harassment and Bullying:

Theon International PLC provides equal opportunities for employment. We base employment decisions on merit, considering qualifications, skills, performance and achievements, and we do not tolerate discrimination against any employee or applicant for employment based on non-work-related personal characteristics, such as race, color, religious beliefs, pregnancy (including childbirth or related medical conditions, as well as breastfeeding needs), gender, sexual orientation, gender identity or expression, transgender status, national origin, ethnic origin or background, social origin, family or marital status, age, disability (physical or mental), medical condition, genetic information, veteran's status or military service, or based on union membership or union activity.

The Company provides reasonable accommodation to qualified individuals with a disability as well as individuals with needs related to their religious observance or practice.

All people have the right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. The Company will not tolerate harassment, bullying or conduct that could lead or contribute to harassment of employees by managers, supervisors or co-workers. The Company will also actively seek to protect employees from harassment or bullying by non-employees in the workplace. Similarly, we will not tolerate harassment or bullying by employees of non-employees with whom our employees have a business, service, or professional relationship. This also extends to conduct that takes place off Company premises (including on social media) that could reasonably impact employees or others within our workplace.

Reporting Inappropriate Conduct:

If an employee believes that they or another individual has been subjected to conduct prohibited by this policy, the employee is urged and expected to report the relevant facts promptly. An employee may make a report either orally or in writing. Concerns can be raised to any member of Theon International PLC management, the Compliance Department or the HR Department. All the above mentioned means of reporting are independent, secure and confidential, offering a safe mechanism for anonymous reporting of suspected concerns or potential violations of our policies or the law.

We take allegations of discrimination, harassment and bullying seriously and ensure they are appropriately investigated. All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or resolution of the matter.

Theon International PLC encourages employees to report in good faith any possible violation of this policy.

Prohibition of Retaliation:

We will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this policy, or in good faith provide information in connection with a report or investigation of any such conduct.

Consequences:

Employees who do not comply with this policy and/or are found to have engaged in discrimination, harassment or bullying, will be subject to appropriate disciplinary action, up to and including termination of employment.