

LEM GROUP NON-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

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Writer	Checkers	Q/EMS approval	CLEM	Version
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Throughout this document, the following verbal forms are used:

- “**shall**” or “**must**” indicate a requirement.
- “**should**” indicates a recommendation.
- “**may**” indicates permission.
- “**can**” indicates a possibility or a capability.

1. PURPOSE

This policy establishes our commitment to a safe and respectful workplace free from discrimination, harassment, and retaliation. It upholds universal human rights, ensures fairness, equal opportunity for all employees and applicants, fostering a culture of respect, dignity, and inclusion.

This policy is not just about avoiding discrimination with respect to age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical beliefs, trade union membership, or other characteristics. It is about actively creating an environment where everyone has the chance to thrive.

2. SCOPE OF APPLICATION

The policy applies to LEM Holding SA and all of its subsidiaries, offices and sites worldwide (“LEM”). It includes all internal stakeholders (members of the Board of Directors, executives, officers and employees) irrespective of their location. All employees are required to read this policy and ensure they fully understand their obligations to comply with it under business environment.

LEM is committed to working with and encouraging its suppliers and customers to uphold the principles in this policy and as needed, to adopt similar policies within their operations.

While this policy establishes global principles of non-discrimination and equal opportunity, LEM recognizes that local laws, cultures, and practices may vary. Each subsidiary and office is responsible for implementing this policy consistently while adapting procedures to comply with local legal requirements. In all cases, the global standards set forth in this document represent the minimum expectations, and local adaptations must uphold or exceed these principles.

3. VERSION LOG

Overview of main changes to this document since first released.

Version	Date (yyyy-mm-dd)	Description of changes
0	2025-12-16	First release



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4. REFERENCE DOCUMENTS

Summary of related documents.

Internal or external	UCLEM	Document title
	CO.11.10.101.0	LEM Group Code of Conduct
	CO.11.10.604.0	LEM Group Labor & Human Rights Policy
	CO.11.10.606.0	LEM Group Whistleblowing and Investigation Policy

5. DEFINITIONS

5.1 Discrimination

Discrimination is treating or proposing to treat someone (or groups) unjustly or unfairly denying equal treatment or opportunity based on a personal characteristic (see below). This may include unfair treatment related to hiring, firing, promotions, training, scheduling, or compensation.

- Age, generation.
- Gender, gender expression, gender identity, sex, sexual orientation.
- Marital status.
- Parental status, pregnancy, childbirth, or breastfeeding.
- Physical appearance.
- Physical or mental disability (even temporary), medical condition, genetic information or characteristics (or those of a family member).
- Protected military or veteran status.
- Religious or politics beliefs.
- Supposed race, skin colour, ethnic or national origin; Nationality, immigration status, citizenship, or ancestry.
- Social background or education.
- Status as a victim of domestic violence, assault, sexual assault or stalking.

This list is not exhaustive and may be supplemented by local law.

5.2 Harassment

Harassment is a type of discrimination which is offensive, inappropriate, unwelcome, or even inadvertent. It has the effect or purpose to:

- Violate a person's dignity.
- Create a degrading, intimidating, humiliating, or offensive/hostile (work) environment.
- Unreasonably interfering with an individual's work performance.
- Have an adverse effect on the individual's employment opportunities.



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Harassment occurs when the behavior is unwanted and/or objectionable or offensive to the recipient or witness to the conduct.

5.3 Sexual harassment

This is a specific form of harassment. It is an unwelcome, non-consensual conduct of a sexual or sexist nature that has the effect and/or purpose of being offensive, degrading or humiliating. Sexual harassment can take many different forms and may include physical contact, advances, comments or other behavior that could create a hostile working environment. Sexual harassment may occur between persons of the opposite or same sex. Depending on the country, sexual harassment can be punished by law, so it may require reporting to local authorities.

6. LEM STATEMENT – AN INCLUSIVE WORKPLACE

LEM is a global company with employees from diverse countries, backgrounds, and cultures. We believe that diversity and employee engagement are a source of strength and competitive advantage. Mutual respect and tolerance are our core values and guide our employees in how to work and communicate. Employment decisions (such as hiring and promotion) are solely based on competence, performance, and potential.

Diversity includes differences in age, gender, ethnicity, abilities, experiences, and perspectives. Inclusion means treating those differences as assets and ensuring all people are respected. LEM is committed to equal opportunities and has zero tolerance for discrimination (see definition in 5.1).

At LEM, we are firmly determined to create a workplace that is both physically and psychologically supportive for all employees, ensuring equal opportunities and fostering a diversified workforce. We also promote flexible work practices, career development discussions, lifelong learning, and training tailored to individual abilities and ambitions. The company strictly prohibits and investigates discrimination, harassment, bullying, and any offensive behavior.

7. ROLES & RESPONSIBILITIES

7.1 Employees

Creating a discrimination- and harassment-free work environment is everyone's responsibility. All employees can contribute to fostering an inclusive work environment, leading by example and demonstrating mutual respect and must not engage or participate in any harassing or discriminatory behaviors.

All LEM employees must:

- Follow the standards of behavior highlighted in this policy while maintaining an inclusive workplace.



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- Participate in the various company mandatory learning opportunities related to fostering a discrimination- and harassment-free workplace environment.
- Offer support to people who experience harassment or discrimination.
- Speak up or encourage people to report any behavior that may violate this policy using the [LEM Whistleblowing Centre](#) as described in the LEM Group Whistleblowing and Investigation Policy. Alternatively, contact the HR team or any trustworthy manager.

7.2 HR and Managers

All HR employees and managers should lead by example by modeling respectful and appropriate standards of behavior aligned with this policy and not tolerate disrespectful and inappropriate behavior.

All LEM HR employees and Managers must:

- Ensure their team are aware of their obligation under this policy.
- Act fairly to resolve issues and enforce workplace behavioral standards.
- Intervene quickly and appropriately when they become aware of inappropriate behavior. This includes meeting the bullied employee and discussing the resolution options.
- Report concerns in a timely manner as per the LEM Group Whistleblowing and Investigation Policy (see 8.2).
- Implement and follow-up on corrective actions in the case of a violation (see 8.3).

All managers who receive a formal complaint or information from another employee regarding alleged discrimination or harassment, or who otherwise observe or suspect any of the same, are required to report such conduct promptly.

8. ACTIONS

8.1 Prevent misconduct

At LEM, we are willing to implement preventive measures and take actions to prevent discrimination from happening. Hence the following guidance are to follow:

- **Development of a speak-up mindset:** LEM employees must feel free and safe to share their ideas, opinions and concerns without fear. LEM is committed to creating an atmosphere that makes people feel comfortable voicing doubts.
- **Visibility of our commitment:** LEM's statement on "an inclusive workplace" shall be shared by all our employees and must also shine externally.
- **Embedding respectful behavior day-to-day:** LEM employees are expected to live up to and demonstrate behaviors in the workplace, in line with our core values, that are free from discrimination, harassment and retaliation.
- **Raising employee awareness:** using specific/mandatory training courses and diversified channels available to all employees to continuously build up their understanding and expertise in these topics.



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8.2 Reporting a violation

All internal and external stakeholders experiencing, observing or suspecting a conduct prohibited by this policy should take one or more of the following actions:

- **Respond to this prohibited behavior** in a way that demonstrates that the conduct is unwelcome, if feeling comfortable doing so. Sometimes, people do not realize the impact that their behaviors and actions have on others.
- **Speak up without fear of harm**, reporting this prohibited behavior using the appropriate reporting process using the [LEM Whistleblowing Centre](#) or alternatively contact the HR team.
- **Leverage on the LEM Group Whistleblowing and Investigation Policy** for further guidance and details around protection of the complainants.

LEM takes all allegations of harassment, discrimination, and retaliation seriously and conducts, when applicable, prompt, thorough and confidential investigation. All submissions are handled impartially, respectfully and in respect of applicable laws. No employee will be subject to any form of retaliation for reporting in good faith, reporting violations of this policy, or for cooperating with any issue requiring follow-up.

8.3 Company responses

LEM will adopt the corrective actions, disciplinary measures and/or legal actions that will be deemed relevant in relation to any violation of this policy and/or applicable laws. Measures may include, for example, training, counselling, and/or disciplinary action such as a verbal/written warning, suspension without pay, or dismissal. This list is not exhaustive. Sanctions are proportionate to the misconduct and may vary as they will be determined in full compliance with relevant applicable local labor laws and procedures, see the LEM Group Whistleblowing and Investigation Policy.

8.4 Monitoring & accountability

LEM is committed to ensuring that this policy is not only communicated but actively implemented and monitored across all operations. Compliance will be assessed through regular audits, employee surveys, and reviews of workplace practices. Key indicators such as diversity metrics, pay equity, and reported incidents will be tracked and analyzed to identify areas for improvement. Progress will be reported transparently to ExCo and Board and, where appropriate, to external stakeholders. Continuous monitoring ensures that our commitment to equal opportunity and non-discrimination remains effective, measurable, and aligned with evolving legal and social standards.

A respectful workplace is more than compliance with the law. It is about a working environment free of discrimination, harassment, and inappropriate behavior of any kind.

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