

GROUP POLICY

Human Rights

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1 Purpose

At Diploma PLC ("Diploma"), we are committed to delivering innovative solutions that create lasting value. Respecting and protecting human rights is a core part of how we do business.

This policy sets out the principles and expectations that guide our approach to human rights. It applies to everyone connected to our business, including employees, suppliers, contractors, and communities.

Our decentralised model gives local businesses responsibility for implementing these principles. Group policies, values, and oversight ensure consistency and accountability across all operations.

We base our approach on internationally recognised human rights standards. These commitments are supported by clear processes for risk assessment, supplier engagement, training, open reporting, and continuous improvement.

We aim to integrate human rights into everyday decision-making and to grow our business in a responsible and ethical way.

2 Scope

This policy applies to all parts of Diploma PLC, including individual businesses, employees, contractors, suppliers, and other third parties acting on our behalf. Each business is responsible for applying this policy within its operations. Local teams are expected to follow their own procedures while aligning with Group values and standards.

Suppliers and business partners must meet the requirements set out in our Supplier Code of Conduct. These include commitments to fair labour practices, safe working conditions, and respect for human rights. We assess compliance through supplier due diligence, audits, engagement, and feedback. Where concerns arise, we expect timely and appropriate action.

3 Policy Statement

Diploma is committed to respecting internationally recognised human rights. We follow the principles set out in the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises.

We embed human rights into how we operate, make decisions, and manage risks. Local businesses are empowered to act with accountability, supported by Group-wide standards and oversight.

Our key commitments include:

- Creating inclusive and respectful workplaces
- Ensuring safe and healthy working conditions
- Supporting freedom of association and collective bargaining
- Prohibiting forced labour, child labour, and human trafficking
- Promoting equal opportunity and non-discrimination

These commitments apply across all our businesses and partnerships. We expect every colleague and supplier to uphold them in practice.

Concerns about human rights can be raised through our confidential reporting channels, including the Safecall service. We do not tolerate retaliation against anyone who raises an issue in good faith.

Our Executive and Senior Leadership are responsible for leading by example and ensuring that our approach to human rights supports sustainable and responsible growth.

This policy is supported by related Group policies, including the Modern Slavery Policy and Supplier Code of Conduct.

4 Our Commitment

Diploma respects human rights as outlined in international frameworks, including the United Nations Guiding Principles on Business and Human Rights, the UN Global Compact, the Universal Declaration of Human Rights, the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises.

We apply these principles across our operations and expect our suppliers and partners to do the same. Each business is responsible for integrating human rights considerations into day-to-day activities, supported by clear Group standards and guidance.

4.1 Respecting human rights

We promote fairness, dignity, and respect for all individuals. Local businesses are expected to ensure that human rights are considered in decision-making, relationships, and risk management.

4.2 Identifying and addressing risks

We assess risks through supplier due diligence, operational oversight, and the use of sustainability tools that combine external data with supplier self-assessments. We focus on high-risk sectors and geographies and take appropriate action where issues are identified.

4.3 Freedom of association

We respect the right of all workers to join or form trade unions and to engage in collective bargaining. We do not tolerate discrimination against employee representatives.

4.4 Prevention of Child Labour, Forced Labour and Human Trafficking

Diploma maintains a zero-tolerance approach to all forms of child labour, forced labour, bonded labour, and human trafficking across its operations and supply chain. This commitment is aligned with the UN Global Compact (Principles 4 & 5), ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises. Further requirements on the prevention of modern slavery, including recruitment practices, worker protections, and supplier obligations, are set out in the Diploma Modern Slavery Policy.

This policy should be read in conjunction with that document and the Supplier Code of Conduct.

4.4.1 Minimum Working Age & Young Workers

- The minimum age for employment shall be no lower than 15 years, or the legal minimum age in the country of operation, whichever is higher, in line with ILO Convention 138.
- Workers under the age of 18 (“young workers”) must:
 - Not perform hazardous work
 - Not work night shifts or excessive hours
 - Be protected to ensure their health, safety, and development

4.4.2 Age Verification Controls

- All businesses must implement robust age verification procedures prior to hiring, including:
 - Verification of official identification documents
 - Maintenance of auditable employee records
- Where documentation is unavailable, alternative verification methods must be used in line with local legal requirements and best practice.

4.4.3 Remediation of Child Labour

- If underage labour is identified:
 - Immediate removal from work in a manner that prioritises the child’s welfare and safety
 - Development of a remediation plan, which may include:
 - Supporting access to education
 - Maintaining income support where appropriate
 - Investigation of root causes and implementation of corrective actions
- Termination alone is not considered an acceptable remediation approach.

4.4.4 Prevention of Forced Labour and Human Trafficking

Diploma maintains a zero-tolerance approach to all forms of forced labour, including prison labour, debt bondage, and trafficking. The following practices are strictly prohibited:

- Retention of passports or identity documents
- Payment of recruitment or placement fees by workers (Employer Pays Principle)
- Coercion, threats, or restriction of movement
- Withholding wages or imposing excessive overtime

All workers must:

- Be employed voluntarily
- Receive clear, written contracts in a language they understand
- Be free to leave employment with reasonable notice

We are committed to protecting vulnerable workers, including migrant workers, by ensuring:

- Transparent and accurate job information
- Fair treatment, safe working conditions, and respect for freedom of movement

To prevent and detect risks of modern slavery:

- We conduct risk-based human rights assessments across operations and supply chains
- High-risk suppliers and geographies are subject to:
 - Enhanced screening
 - Periodic assessments and audits if found necessary
- Human rights risks are integrated into supplier onboarding and ongoing evaluation processes

4.4.5 Supplier Requirements

- All suppliers must comply with the Diploma Supplier Code of Conduct and applicable laws
- If needed, suppliers must:
 - Demonstrate controls to prevent child and forced labour
 - Cascade these requirements to their own supply chains
- Non-compliance may result in:

- Mandatory corrective action plans
- Potential suspension or termination of the relationship

4.4.6 Reporting and Whistleblowing

Diploma encourages the reporting of any concerns related to child labour, forced labour, human trafficking, or other human rights issues. Concerns should be raised as early as possible, even where there is uncertainty.

Concerns can be reported through:

- The Diploma Confidential Hotline, operated by Safecall, an independent third-party service available 24/7
- Line management or a trusted senior colleague
- Local HR or Group HR
- The Group General Counsel or Internal Audit

All reports:

- May be made confidentially or anonymously
- Are treated seriously and handled in a timely, fair, and objective manner
- Are assessed and, where appropriate, investigated in line with the Group Whistleblowing Policy

Diploma does not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation. All individuals are protected when reporting concerns, even if they are not ultimately substantiated.

This section should be read in conjunction with the Diploma Whistleblowing Policy, which sets out detailed procedures for reporting, investigation, oversight, and protection.

4.4.7 Monitoring, Targets and Continuous Improvement

Diploma is committed to continuously strengthening its approach to preventing child labour, forced labour, and human trafficking through measurable objectives and regular performance monitoring.

We aim to:

- Conduct risk-based human rights assessments on high-risk suppliers prior to onboarding
- Increase coverage of supplier assessments and audits in high-risk regions year-on-year
- Ensure that any identified cases of non-compliance are subject to corrective action plans and follow-up verification
- Provide regular training to relevant employees on identifying and preventing modern slavery risks
- Review and update our human rights risk assessments at least annually

Performance is:

- Monitored through internal reviews, supplier assessments, and audit findings
- Reported to senior management as part of sustainability governance processes
- Used to drive continuous improvement across operations and supply chains

4.5 Promoting inclusion

We reject discrimination based on gender, race, disability, age, religion, sexual orientation, or any other protected characteristic. We aim to create inclusive workplaces based on fairness and merit.

4.6 Working Conditions, Remuneration and Wellbeing

Diploma is committed to providing fair, safe, and respectful working conditions for all employees, in line with applicable laws, ILO standards, and internationally recognised human rights frameworks. These principles are also reflected in the Diploma Supplier Code of Conduct.

4.6.1 Working Hours and Rest Periods

- Working hours, overtime, and rest periods must comply with applicable legal requirements and industry standards
- Overtime must be voluntary, not excessive, and compensated in accordance with applicable laws or agreements
- Employees are entitled to adequate daily and weekly rest periods, including regular days off in line with or exceeding local legal minimums.
- Paid annual leave, public holidays, and other statutory leave entitlements are provided in accordance with local law.
- We support a healthy work-life balance, including respect for reasonable working hours and the right to disconnect where applicable

4.6.2 Fair Remuneration and Benefits

- All employees must receive fair and timely remuneration that meets or exceeds applicable minimum wage requirements
- Wages must be paid regularly, transparently, and in accordance with local laws
- We are committed to equal pay for equal work and non-discrimination in compensation
- Employees are provided with legally mandated benefits, and we aim to support access to additional benefits where appropriate
- Where statutory benefits apply — including social insurance, pension, parental leave, sick pay and paid holidays — we meet or exceed local requirements

4.6.3 Employee Engagement and Representation

- We respect employees' rights to freedom of association and collective bargaining, in accordance with applicable laws
- Employees and their representatives can raise concerns and engage in dialogue on working conditions without fear of retaliation
- Where applicable, we support consultation with employees or their representatives on significant changes to working conditions

4.6.4 Safe and Healthy Working Environment

- We provide and maintain a safe and healthy working environment, in line with the Diploma Health & Safety Policy
- This includes:
 - Identification and management of workplace risks through risk assessments
 - Provision of appropriate personal protective equipment (PPE)
 - Training and awareness programmes to promote safe behaviours
- We continuously work to prevent accidents, injuries, and work-related ill health

4.6.5 Monitoring and Continuous Improvement

- Working conditions are monitored through internal reviews, audits, employee feedback, and engagement processes

- We are committed to continuously improving our approach to employee wellbeing, working conditions, and labour standards across all operations

We aim to continuously improve working conditions through regular employee engagement and monitoring of key indicators such as working hours compliance, employee satisfaction, and access to benefits.

4.7 Monitoring and improvement

We monitor compliance through audits, internal reviews, and supplier engagement. We are committed to continuous improvement and regularly review our practices to strengthen our impact.

5 Your Responsibilities

Everyone at Diploma shares responsibility for upholding human rights. These responsibilities apply across all levels of the Group, from senior leadership to individual colleagues, suppliers, and business partners.

Executive & Senior Leadership

Leaders are responsible for embedding this policy into business strategy, governance, and risk management. They are expected to lead by example, support ongoing improvements, and ensure accountability across the Group.

Business Leadership

Local business leaders must apply this policy in their operations and ensure alignment with Group standards. This includes identifying human rights risks, implementing relevant controls, and ensuring compliance with the [Supplier Code of Conduct](#) and [Health & Safety Policy](#).

All Colleagues

Each colleague is expected to respect the rights of others and speak up if they see or suspect behaviour that may cause harm. Concerns can be raised confidentially or anonymously through the Safecall hotline or other approved channels. Speaking up in good faith is always protected.

Suppliers and Partners

Suppliers and other partners must comply with the [Supplier Code of Conduct](#). This includes clear expectations on labour rights, non-discrimination, health and safety, and the prohibition of modern slavery. We monitor compliance through due diligence, audits, and regular engagement. Suppliers who fail to meet our standards will be required to take corrective action.

6 Compliance & Non-Compliance

Respect for human rights is a core expectation for everyone working at or with Diploma. This includes employees, contractors, suppliers, and all third parties acting on our behalf.

Any breach of this policy may lead to disciplinary action, including termination of employment or contract. For external partners, serious breaches may result in suspension or the end of the business relationship.

Concerns about potential breaches should be reported through the appropriate channels. This includes contacting the Group Sustainability Director or using our confidential, independently managed reporting line, Safecall.

All reports are treated seriously, investigated promptly, and handled fairly. Anyone raising a concern in good faith is protected from retaliation, regardless of the outcome.

When a breach is confirmed, we take corrective action and, where needed, steps to address any harm. We also review relevant processes to reduce the risk of future issues.

7 Contacts

If you have a question about this policy or a concern related to human rights, you are encouraged to speak with your local manager or contact:

- **Group Sustainability Director:** Phil.Pratt@diplomapl.com
- **Group Sustainability Team:** Sustainability@diplomapl.com

To report a concern confidentially or anonymously, use the Diploma Confidential Hotline, operated by Safecall, an independent third party available 24 hours a day.

- **Freephone:** visit safecall.co.uk to find local numbers
- **Online:** safecall.co.uk/file-a-report
- **Email:** diploma@safecall.co.uk

Safecall reports are handled in confidence. Calls are not recorded. All concerns raised in good faith are protected under this policy. Retaliation will not be tolerated.