

# 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.

## 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 Prohibiting forced and child labour

We have zero tolerance for modern slavery in any form, including forced, bonded, or child labour. All workers must be free to leave employment with reasonable notice and without coercion. We prohibit practices such as the withholding of identity documents or the charging of recruitment fees. We do not work with suppliers or partners who fail to meet these standards.

### 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 Safe working conditions

We are committed to providing a safe, healthy, and respectful environment for all colleagues. Each business follows our [Group Health and Safety Policy](#) and participates in programmes such as "Stand Up for Safety" to promote continuous improvement.

## 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](mailto:Phil.Pratt@diplomapl.com)
- **Group Sustainability Team:** [Sustainability@diplomapl.com](mailto: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](https://safecall.co.uk) to find local numbers
- **Online:** [safecall.co.uk/file-a-report](https://safecall.co.uk/file-a-report)
- **Email:** [diploma@safecall.co.uk](mailto: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.