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Diversity, Inclusion and Equity Policy

Last updated: 03/2023

Distributed to all employees of DO & CO

In our increasingly competitive business environment, we understand that the performance and engagement of our employees are central to success. Thus, we continuously strive to create an environment in which each employee can fulfil their potential and maximize their contribution.

Diversity, inclusion, and equity are important principles that promote fairness and equal opportunity for all individuals, regardless of their background or identity. A commitment to these values creates a more inclusive and equitable society, but can also lead to better decision-making, problem-solving and increased innovation, and creativity at workplaces. At DO & CO we are committed to promoting equal opportunities, valuing diversity, and creating an inclusive working environment for all our employees.

This policy does not form part of any employee's contract of employment. DO & CO AG reserves the right to change this policy at any time and in any event will review it periodically.

We commit to:

- Ensure diversity, inclusion and equity in the workplace are supported and celebrated.
- Offer fair treatment in every aspect of working life in DO & CO, this applies to all employment policies and practices including those relating to:
 - Recruitment, selection, and retention.
 - Terms and conditions of employment.
 - Working environment.
 - Learning and development.
 - Promotion and career progression.
 - Redundancy and re-deployment.
- Promote a culture where employees recognize the value that a diverse and inclusive workforce brings.
- Be recognized as an employer with a positive reputation for diversity and inclusion practices.

A. Relationship of this policy to legislation.

Protected Characteristic (UK)	UK Definition
Age	Refers to a person belonging to a particular age (e.g., 32-year-olds) or range of ages (e.g. 18 – 30-year-olds).
Disability	A person has a disability if s/he, they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender Reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	The formal union of a man and a woman or marriage between same-sex couples. Same-sex couples can also have their relationships legally recognized as 'civil partnerships'. Civil partners must be treated the same as married couples in a wide range of legal matters.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after birth and is linked to maternity leave in the employment context.
Race (includes colour, nationality, and ethnic origins)	Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
Sex	Gender assignment at birth, i.e., assigned male or female at birth.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or both sexes.

In line with the legislation those perceived as having one of the protected characteristics are also protected.

An additional characteristic which may be protected but is not noted within the Equality Act 2010 is:

Gender Identity	An individual's personal sense of having a particular gender.
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B. Types and definitions of discrimination.

Before outlining DO & CO's policy actions and initiatives, it is important to outline and define the types of discrimination that the policy actions are aiming to eliminate from the workplace. The following definitions were derived from the EU Anti-Discrimination law:

- **Direct discrimination** refers to the case where individuals or groups in a comparable situation are treated with different criteria, based on their racial or religious background, gender, sexual orientation, disability, age, or parental status.
- **Indirect discrimination** refers to the case where practices, policies or behaviours are implemented for everyone in the same way, without considering the negative effects these practices can have on individuals or groups of different racial or religious backgrounds, gender, sexual orientation, disability, age, or parental status. This neutral stance cannot be justified on objective grounds and can result in positioning the given group in a disadvantageous position, compared to that of other people.
- **Harassment** refers to unsought conduct towards a person or a group associated with any of the guarded grounds of racial and religious backgrounds, gender, sexual orientation, disability, age, or parental status. This conduct aims to intimidate, harass, and humiliate the given person or group, resulting in the creation of a hostile and offensive environment.
- **Victimization** refers to the adverse treatment of a person, founded upon her/his discomfort, protest or whistleblowing of discriminatory behaviour directed towards them, or assisting another individual to bring forth a complaint about a similar situation.

C. Implementation.

To achieve our aims, and prevent the occurrence and perpetuation of the above-outlined offensive behaviours and treatments, DO & CO hereby commits to the following:

1. Ensuring that the principles of this policy are embedded in HR strategy and all policies and procedures are regularly monitored, reviewed, and updated based on the latest developments, initiatives and guiding principles of the EU Commission and ILO conventions, covering the important topics of social and labour issues, human rights, gender equality, social dialogue, and security.
2. Providing awareness training and guidance to all employees and managers to ensure our commitment to Diversity, Inclusion & Equity is known and understood.
3. Monitoring and measuring throughout the employment lifecycle using qualitative and quantitative information to assist in identifying and removing any form of discrimination following applicable data privacy regulations.
4. Continue and enhance the equality of the recruiting process, diversifying our workforce and offering equal opportunities to candidates irrespective of their racial and religious backgrounds, gender, sexual orientation, disability, age, or parental status.
5. Challenging and investigating discriminatory behaviour and enforcing a disciplinary procedure, when this is considered necessary, in addition to ensuring equal opportunities for career and personal development to all members of the company's staff.
6. Recognizing the extent of the issue of gender inequality in the European and global context and with



respect to the EU's gender pay gap Action Plan, DO & CO commits to continue its rigorous efforts to reaffirm gender equality within its workforce by offering equal employment, development opportunities and equal pay.

7. Communicating, through internal communication channels, and regularly reviewing ED&I initiatives that have successfully been implemented.
8. Working with external groups and advisory bodies to keep up to date with external best practices.

Some examples of how we will continue to achieve this are:

9. Outline and establish a comprehensive recruiting process which reflects our willingness and commitment to select suitable candidates solely based on merit and qualifications, and not based on race, religion, gender, sexual orientation, disability, age, or parental status.
10. Continue using a diverse group of interviewers to avoid any potential bias and provide training to all employees involved in the recruitment process on discriminatory and bias issues and ensure their understanding and adherence to DO & CO's non-discrimination recruiting policy.
11. Intensify efforts to recruit diverse talent by utilizing a broad spectrum of recruitment platforms, for instance, professional organizations, as well as online job fairs and portals.
12. Ensuring that practices and assumptions made about ability based on age are eliminated and not using age as a criterion to restrict access to services (unless it can be objectively justified).
13. Discouraging assumptions made about ability based on an individual's disability, impairment, or health condition.
14. Reviewing our recruitment processes for disabled applicants and taking appropriate measures, so far as is practicable to ensure that applicants with a disability have the same opportunities as those without disabilities.
15. Supporting employees who experience disability whilst in their post to include the provision of reasonable adjustments and access to the occupational health service. This will include access to appropriate equipment, information, decision making and means of communication through, for example, the use of, tape, Braille, interpretation for hearing-impaired people etc.
16. Supporting all employees, as appropriate to the needs and demands of the business, in making personal choices about their parenting, caring and work roles and responsibilities, and helping them find a work-life balance that supports all priorities.
17. Actively supporting those employees taking family-friendly leave. For instance, we will ensure all employees are welcomed back appropriately and kept in contact with whilst on maternity, adoption, paternity or shared parental leave.
18. Valuing the skills developed in the home and community as well as those developed in the workplace and will, as appropriate to the needs of the business support employees to play an active part in the community they live in.
19. Ensuring everyone feels comfortable in the workplace to discuss their own personal marital/relationship status and their family situation.



20. Confronting homophobic attitudes, behaviours and language and promoting an understanding of individual rights and attributes.
21. Ensuring we take a proactive role in promoting the understanding of gender, transgender as well as marital/civil partnership status.
22. Ensuring religious festivals, holidays and rights of worship are recognized and accommodated wherever and whenever reasonably practicable, taking into consideration business needs and requirements.
23. Ensuring dietary needs are catered for where reasonably practicable, for example at training events and special events.

D. Monitoring.

We continuously review this policy together with DO & CO management and the HR department. The review is based on rigorous and GDPR-conform monitoring and reporting on the upholding and respect of human rights within the organization.

To ensure that this policy and other procedures are operating effectively, DO & CO management will establish efficient cooperation and coordination, as well as an open communication channel with its Legal, Human Resources, and (where applicable) external stakeholders to continue to monitor any reports or comments made by our employees. We will benchmark our performance as a company based on those reports and ensure that any patterns or trends are identified and resolved in an effective manner.

E. Responsibilities.

The Board: The Management Board Members, Attila Dogudan and Attila Mark Dogudan, hold managerial responsibility for overseeing and operationalising the Diversity, Inclusion & Equity Policy throughout DO & CO's global operations.

Human Resources Department: The HR department is responsible to monitor and assess issues related to upholding the standards of the policy safeguarding Diversity, Inclusion and Equity. Furthermore, it is tasked to, in collaboration with management and the Legal Department ensure appropriate measures are in place, based on the implementation strategy outlined above. Finally, it is responsible for monitoring and taking the necessary measures and actions in case of the violation of the above-mentioned guidelines and principles.

Sustainability Team: the sustainability team ensures that the policy is always up to date and reflects fully on all stakeholder inquiries regarding external and internal communications. The policy is therefore reviewed on an annual basis and cross-checked with the other responsibility holders to inform them of any changes that might have occurred.

Legal department: the legal department is responsible for compliance with national and international legislative frameworks. It will therefore coordinate with management and the HR Department to ensure the implementation of this policy. Furthermore, necessary information regarding the appropriate legal procedures in case any of the above clauses are violated and any discrimination cases come to the attention of management or another department.




F. Managerial responsibility statement


DO & CO's Members of the Management Board, Attila Dogudan and Attila Mark Dogudan, hereby state that they hold themselves accountable for the application, operationalization, upholding and general oversight of the above-outlined Diversity, Inclusion and Equity Policy. The above statement entails that management is responsible for monitoring the steps taken by the HR Department to maintain the adequacy of the policy and update, when necessary, the relevant procedures. The Members of the Management Board also commit to monitoring the efforts of the Legal and HR Departments to communicate and implement comprehensively the content of the given policy and its relevant procedures to the staff.

The Company was guided by international GRI, ILO & EU standards during the preparation and presentation of this policy.

MANAGEMENT NAME *Attila Dogudan*

SIGNATURE _____


MANAGEMENT NAME *Attila Mark Dogudan*

SIGNATURE _____


A draft of the policy was reviewed and approved by a Member of the Management Board on 20/03/2023.