

Anti-Discrimination and Anti-Harassment Policy

Effective Date: January 2024
Review Cycle: Annually (next review due: January 2027)
Policy Owner: Human Resources Manager
Approved By: Chief Operating Officer (COO)

Scope

This policy applies to all employees, temporary employees, consultants, contractors and any other third parties, which include customers and vendors.

Anti-Discrimination and Anti-Harassment Policy

The Company is firmly committed to creating a respectful working environment and prohibits unlawful discrimination (including harassment) based on the race, sex, gender, age, religion, disability, sexual orientation, predisposing genetic characteristics, genetic information, national origin, military status, color, marital status, familial status, domestic violence victim status, gender identity or expression, or any other characteristics protected by law of the individual or anyone associated with the individual. The term "race" includes any traits historically associated with race, including, but not limited to, hair texture and protective hairstyles.

This prohibition against unlawful discrimination and harassment applies to all terms and conditions of employment, including hiring, placement, assignment of duties, training, promotion, termination, compensation, and benefits. All Company employees are responsible, individually, and collectively, for fostering respect and teamwork in the workplace and for complying with this policy prohibiting discrimination and harassment in all facets of the Company's business.

Sexual harassment is covered by the Company's Sexual Harassment Prevention policy below. For more information on sexual harassment, please refer to that policy.

This policy applies to all of the Company's employees, applicants, employees of contractors, subcontractors, vendors, consultants, and other persons who provide services in the Company's workplace, such as interns and temporary employees. The Company will not tolerate unlawful discrimination by or against any individuals covered by this policy.

To promote the standards of respect that the Company expects from its employees, it is the Company's intention to interpret this policy broadly. Employees are responsible for understanding this policy and should refrain from any conduct that might offend another employee or have a negative impact on that person's performance or working environment.

Responding to Discrimination

All employees are expected to respond promptly and appropriately to conduct in the workplace, which violates this policy. Employees may formally or informally raise issues or concerns regarding any suspected discrimination through the complaint procedures described below. These procedures replace the procedures in the Open Door Policy for all discrimination issues, except for sexual harassment, which should be reported pursuant to the procedure in the Company's Sexual Harassment Prevention Policy.

The key to successful implementation of this policy is prompt reporting of any actual or suspected problem, so any issues or concerns should not go unreported.

A. **Complaints**. Individuals who believe they have been the victim of discrimination should promptly report their concern to their immediate supervisor or Human Resources. Individuals who observe discrimination or harassment of another employee should promptly report their observations to their immediate supervisor or Human Resources.

B. **Investigation**. The Company will investigate all complaints of discrimination, and all employees must cooperate with any such investigation. Employees are expected to be truthful in making complaints and participating in investigations. The Company will treat such complaints as confidential to the extent practical and consistent with a complete and thorough investigation. The Company's investigation typically will begin with an interview of the person raising the complaint and may include a variety of other steps including interviews with the alleged offender, interviews with other employees, review of documents, and other measures designed to elicit information relevant to the concerns raised in the complaint.

C. **Resolving the Complaint**. Once the Company's investigation of the complaint is complete, the investigator will report the results of the investigation to Human Resources, who will review the investigation, determine whether any further investigation is required, and determine the appropriate action, if any, to be taken. Any employee who is found to have violated the Company's policy prohibiting discrimination or harassment may be subject to disciplinary action, up to and including termination.

D. **Protection Against Retaliation**. This policy prohibits retaliation against any individual who makes a report of suspected discrimination or who provides information relevant to a report of discrimination. Individuals should report any acts of retaliation to their immediate supervisors or Human Resources. The Company will promptly investigate any such reports. Retaliation may result in disciplinary action, up to and including termination.

Accommodations for Disabilities

Diamond is an equal opportunity employer and does not discriminate against qualified individuals with disabilities in its employment decisions and practices, including job application procedures, hiring, training, compensation, discipline, and termination. Individuals should inform Human Resources of any need for accommodation based on a disability. A reasonable accommodation may include making an exception to one of the Company's policies in this Handbook. The Company will engage in an interactive process with each individual regarding accommodation. The Company will reasonably accommodate any protected individuals unless such accommodation imposes an undue hardship or a direct safety threat.

Accommodations for Religious Practices

Diamond is an equal opportunity employer and does not discriminate against qualified individuals based on their religious beliefs. Individuals should inform Human Resources of any need for accommodation based on their religious practices, including wearing any attire, clothing, or facial hair in accordance with the requirements of his or her religion that would not otherwise be permitted under the Company's policies. The Company will reasonably accommodate any protected individuals unless such accommodation imposes an undue hardship.

Accommodations for Victims of Domestic Violence

Diamond will provide reasonable time off as accommodation to employees who are victims of domestic violence or parents of children who are victims of domestic violence. Time off will be provided for the following reasons:

- To seek medical attention for injuries caused by domestic violence (including for a child who is a victim of domestic violence, providing the employee is not the perpetrator)
- To obtain services from a domestic violence shelter, program, or rape crisis center as a result of domestic violence
- To obtain psychological counseling relating to domestic violence (including for a child who is a victim of domestic violence, provided that the employee is not the perpetrator)
- To participate in safety planning or to take other actions to increase safety from future incidents of domestic violence and/or
- To obtain legal services, assist in the prosecution of the offense, or appear in court in relation to the incident of domestic violence.

Under New York State Human Rights Law, the Company will provide any requested leave unless the employee's absence constitutes an undue hardship on the business. Employees granted leave as reasonable accommodation due to domestic violence will be required to use paid leave, when available. Any absence that cannot be charged to paid leave will be treated as unpaid leave.

In order to request this time off, employees should contact Human Resources to begin the process. Whenever applicable, the Company and the employee will work together through an interactive process to discuss accommodations.

The Company must be provided with reasonable advance notice whenever feasible if the employee plans to take time off under this policy. If advance notice is not feasible, the Company may require certification of the absence with the following:

- A police report indicating that the employee or his/her child was a victim of domestic violence.
- A court order protecting or separating the employee or his/her child from the perpetrator of domestic violence.
- Evidence from a court or prosecuting attorney that the employee appeared in court.
- Documentation from a medical professional, domestic violence advocate, health care provider or counselor that the employee or his/her child was undergoing treatment or counseling for physical or mental injuries resulting from domestic violence.

Diamond's **Anti-Discrimination and Anti-Harassment Policy** is found in the Employee Handbook. This policy is signed off on by all employees.

Key Performance Indicators (KPIs)

To monitor progress on implementation measures, Diamond tracks the following KPIs:

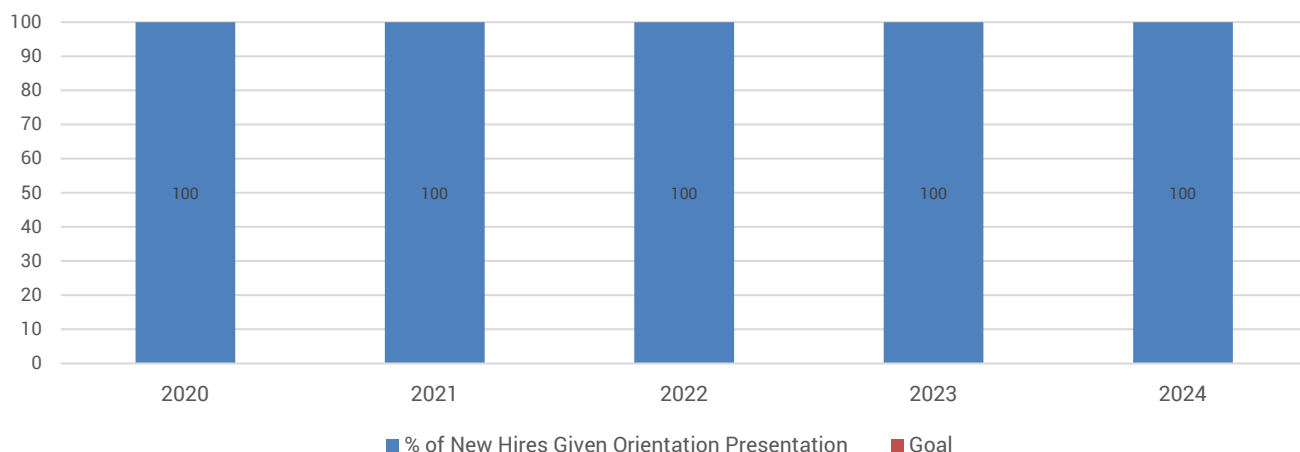
Employees Trained on Non-Harassment



Training is provided annually per New York State law by Bond, Schoeneck & King PLLC, Diamond's corporate law firm.

New Hires Given New Hire Orientation Presentation and New Hire Training, which include:

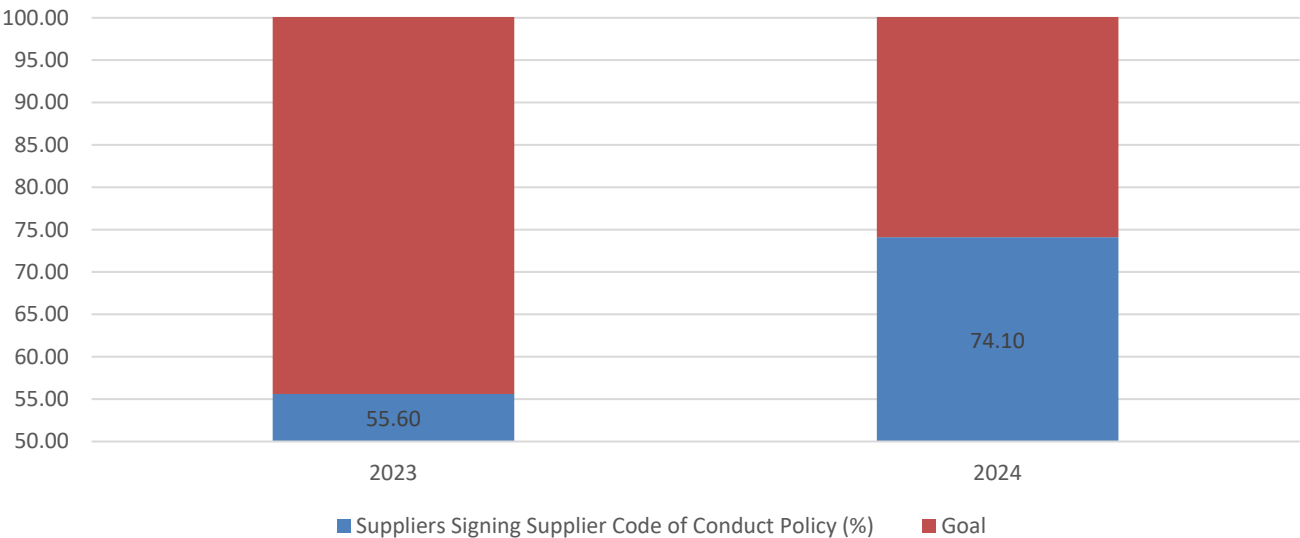
- Human resources
- Safety
- Department
- Information technology
- Quality



All new hires must sign and acknowledge receipt of the Orientation and Training Checklist during the onboarding process.

Suppliers Signing Code of Conduct Policy addressing:

- All applicable laws, regulations
- All environmental laws
- Safe and healthy work environment
- Labor practices
- Forced labor, child labor
- Discrimination
- Ethics
- Compliance



Diamond is committed to conducting procurement in an ethical, legal, and socially responsible manner. Diamond expects its suppliers to share this commitment. All Diamond suppliers must meet the minimum requirements outlined in the Supplier Code of Conduct document to do business with Diamond. This document is sent to all major Diamond suppliers, requesting them to sign and return to acknowledge compliance with these standards. All responses are tracked in Diamond’s SharePoint database with the following status – Complete, Complete (no exception), Pending, N/A – and date completed.

Diamond's **Supplier Code of Conduct Policy** is also publicly available in its GRI-aligned 2025 Sustainability Report and on the ESG Policies web page of its [website](#).

Governance Structure

The implementation and oversight of this Anti-Discrimination and Anti-Harassment Policy is governed through the following structure:

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Reports training metrics to executive leadership
- Assists with Social Compliance audits as needed

Marketing Director / Sustainability Lead

- Overall accountability for ESG reporting
- Authors annual Sustainability Report for customers and external stakeholders, including CDP, EcoVadis, UN Global Compact

Policy Review and Continuous Improvement**Annual Review Process**

- This policy will be formally reviewed annually in Q1 of each calendar year
- Review will assess progress against quantitative target
- Updates will be incorporated based on:
 - Regulatory changes relating to ethics or bribery
 - Evolution of industry best practices
 - Performance data from the previous year

Trigger-Based Reviews

- Policy may be reviewed outside the annual cycle when:
 - New legislation becomes available
 - Stakeholder concerns necessitate policy adjustments

Documentation and Communication

- All policy updates will be documented with a date or version control
- Updated policies will be communicated to all suppliers within 30 days
- Training will be provided to all Diamond employees on any material changes

Performance Monitoring

- Annually: Track training rates
- Annually: Evaluate Supplier Code of Conduct compliance
- Report findings to executive leadership and incorporate into continuous improvement initiatives

External Verification

- Participate in industry benchmarking to identify improvement opportunities
- Maintain transparency through public reporting of key metrics