

Open Door 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 Diamond employees.

Open Door

It is the Company's objective to provide a work environment free from elements that would deter you from doing your best work. The Company maintains this policy so that you feel comfortable raising and discussing any workplace issues you may have. We welcome your input. You are encouraged to report any issues or problems in the workplace to your immediate supervisor. You may request a meeting with Human Resources when (1) your immediate supervisor is unavailable, (2) you believe it would be inappropriate to contact your immediate supervisor, or (3) you discussed the issue with your immediate supervisor, and you feel the problem or issue is still unresolved. Human Resources may discuss the issue with your immediate supervisor. In an effort to resolve the problem, Human Resources or your immediate supervisor may conduct an investigation. You will receive a response to your problem from Human Resources or your immediate supervisor. If you are unsatisfied with this response, you may provide a written report to Karla Fichter regarding your problem. After she reviews and considers your problem, she will provide a written response to you and Human Resources.

Diamond does not tolerate retaliation against employees who use this "open door" procedure. Employees will not be penalized for raising a problem or issue in a reasonable manner pursuant to the procedure in this policy. However, this procedure does not prevent, limit, or delay the Company from taking disciplinary action against any employee.

Labor Practices and Human Rights Measures

Employee Handbook

- 100% of employees must sign and acknowledge receipt of the Employee Handbook during the hiring process

Audit and Verification Program

- Utilize third-party audits (e.g., EcoVadis, FSC) for independent verification of labor practices
- Maintain compliance reporting through formalized KPIs



Continuous Improvement Measures

Data Collection and Analysis

- Maintain all records related to Open Door Policy reporting and resolution(s)
- Maintain compliance reporting through formalized KPIs
- Track average resolution time for reported issues to identify process delays
- Analyze trends in issue types and frequencies to identify systemic workplace concerns
- Conduct quarterly reviews of anonymous feedback data to measure employee trust in the process

Stakeholder Engagement

- Solicit feedback from employees on expectations relating to the policy
- Engage with industry associations to stay current on best practices
- Hold focus groups with diverse employee representatives to gather qualitative insights on policy effectiveness

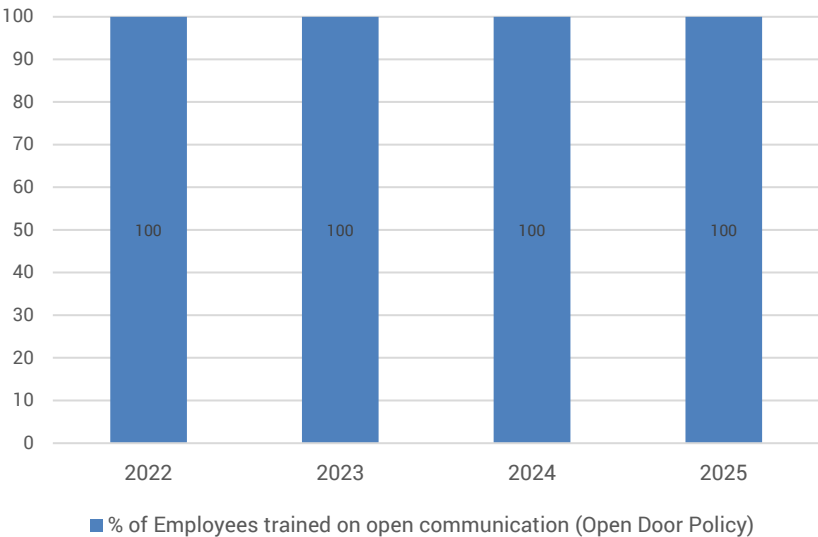
Innovation and Technology

- Develop an internal dashboard for HR to track and manage open cases, ensuring timely follow-up and resolution

Key Performance Indicators (KPIs)

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

Employees Trained on Open Communication (Open Door Policy)



Diamond's objective is to provide a work environment free from elements that would deter employees from doing their best work. The company maintains this policy so that employees feel comfortable raising and discussing any workplace issues they may have. Diamond’s Open Door Policy is found in the Employee Handbook. This policy is signed off on by all employees. Diamond's Open Door 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 Open Door Policy is governed through the following structure:

Human Resources Manager

- Overall accountability for human resources practices and adherence to standards
- Reports KPI progress 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
 - Evolution of industry best practices
 - Performance data from the previous year

Trigger-Based Reviews

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

Documentation and Communication

- All policy updates will be documented with a date or version control
- Training will be provided to Diamond employees if needed

Performance Monitoring

- Annually: Track training rates
- 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