
Group Policy - Diversity, Equity and Inclusion (DEI)

Approved by Board on 5 December 2023

1. Introduction

The Pebble Group plc’s (the “**Group**”) culture promotes integrity and openness, values diversity and is responsive to the views of shareholders and our wider stakeholders. Diversity, Equity and Inclusion (“**DEI**”) is an important part of our long-term focus on shareholder value. We recognise how important our people are to our long-term success and our aim is to expand, celebrate and embrace individuality and diversity across our team. We know that building a diverse and inclusive culture and having businesses that are representative of wider society, will lead to a better business, a better place to work for our entire team and, ultimately, will make the Group more valuable and effective overall. We are therefore committed to taking steps to enhance DEI throughout our Group and subsidiaries.

The Group is acutely aware of the broad diversity of our current and potential customers, partners, suppliers, and employees and how crucial it is to be open, relevant, and connected. As part of our wider commitment to Environmental, Social and Governance matters, this policy sets out our approach to DEI; and shows how we aim to embed and enhance our commitment to diversity further into our businesses.

We see ourselves on a journey to continuously improve on these matters.

2. Our Approach

We are focussed on promoting diversity in:

- Ethnicity
- Gender
- Age
- Disability
- Education and socio-economic background
- Sexual orientation

and the representation of minority groups throughout our organisation at each level.

We also see diversity of personal attributes having equal importance. We seek to build a team that consists of individuals who have a range of skills and attributes, such as strength of character, courage, openness, honesty, tact, an ability to listen, forge relationships and develop trust, and sources of intellect, critical assessment, and judgement. We are therefore also focussed on diversity in cognitive and personal strengths.

The Group will remain focussed on meritocracy which remains important, but we see this as something which goes hand-in-hand with our DEI priorities.

We strive to provide an inclusive place for you to work where there is inclusive leadership, everyone feels valued and is respected and treated fairly. We’re focussed on ensuring that you are all provided equal opportunities and feel safe in a ‘speak-up’ culture with inclusive systems and processes.

References to the “**Nominated Officer**” are to the Group General Counsel and Company Secretary.

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3. Responsibilities – who must comply with this Policy?

The Group Chief Executive Officer (“CEO”) has primary responsibility for establishing and maintaining proportionate and effective policies and processes within the Group that promote and encourage DEI. Ultimately the Pebble Group Board of directors has overall responsibility for ensuring this Policy complies with our legal, regulatory and ethical obligations, and that all those under our control comply with it.

Then it is the responsibility of the Divisional Lead of each Group business and their leadership teams, to ensure the effective implementation and operation of the details outlined in this Policy by their respective businesses and for managing the Group’s performance associated with greater diversity.

Supporting DEI in the workplace is the responsibility of all leaders and managers in the Group who are responsible for ensuring that those reporting to them understand and comply with this Policy, and are given adequate training on DEI.

All directors, officers and employees, as well as other personnel who have the status of employees of the Group and its subsidiaries (collectively “Group Employees”) have to follow the requirements of this Policy.

In addition, we seek to work with business partners and others who share our values and standards and we expect them to behave consistently with the provisions in this Policy.

This Policy is directly applicable to each Group business. It is the responsibility of each Divisional Lead to either incorporate it directly as one of their own working documents or ensure that their business has its own equivalent policy and procedures on DEI. Such policies and procedures must be adapted to the businesses’ own needs and the requirements of applicable local laws and regulations. However, they must also be consistent with, and a more detailed continuation of, the principles and provisions of this Policy.

4. Questions on this Policy - who to go to for advice and guidance?

If you have questions or concerns regarding any aspect of this Policy or wish to seek guidance on its interpretation and application in a specific situation, you should raise and discuss this with your direct line manager, any member of the senior management team, your local HR department or alternatively the Nominated Officer.

5. How to raise concerns and seek guidance

If circumstances arise that give you reason to pause and consider whether a proposed course of action may contravene or contradict the principles contained in this Policy (involving other employees or any third party it is your duty to speak up and you are encouraged to discuss it with your manager or a member of the senior management team or your HR Department, who must notify the Nominated Officer.

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Alternatively, you can report it through our Group Whistleblowing Portal: <https://thepebblegroup.integrityline.com/>. Employees will receive the Group's full support when raising any such concerns.

Managers have a responsibility to encourage staff to speak freely and report any suspicion of inappropriate behaviour by another Group Employee.

6. Policy Statement

- We aim to have a team which is representative of all sections of society.
- Each employee must be treated fairly, feel valued and respected and able to give their best.
- We have zero tolerance of discrimination and victimisation. We aim to protect against discrimination for those with protected characteristics within the meaning of the Equalities Act 2010 and ensure that people are measured based on merit and objective criteria:
 - No employee or job applicant will receive less favourable facilities or treatment (either directly or indirectly) in recruitment or in their employment on the grounds of ethnicity, race, religion or belief, their gender / gender reassignment, age, disability, marriage / civil partnership, pregnancy / maternity, education, socio-economic background or sexual orientation.
 - Selection for employment, promotion, training or any other employment support or benefit will be on the basis of aptitude and ability, measured using objective criteria.
 - All employees will be encouraged and supported to develop to their full potential and the talents and resources of our teams will be fully utilised to maximise the efficiency of the organisation.
- You, our team, must never discriminate (directly or indirectly), victimise or harass customers, partners or suppliers in connection with ethnicity, race, religion or belief, their gender / gender reassignment, age, disability, marriage / civil partnership, pregnancy / maternity, education, socio-economic background or sexual orientation.

7. Our Commitments

- To appoint an Executive Sponsor for all DEI issues in each of the Group's businesses, to provide visible leadership on DEI, to support and encourage DEI related initiatives, and to ensure that DEI remains a firm priority on the agenda and taken account of in all appropriate situations and decision making. Chair of The Pebble Group Nomination Committee to meet annually with Executive Sponsors to discuss DEI progress.
- To support our DEI ambitions, our HR teams will begin to capture ethnicity and other diversity data about our teams and analyse that to achieve greater transparency and understanding about the make-up of our teams across our Group.

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- To continue to build an inclusive culture by measuring employees’ experiences and perception of our culture; fair and inclusive treatment; DEI initiatives; and dignity and respect in the workplace, through periodic employee engagement surveys (to be carried out on an anonymous basis at least every year), then address the points raised. This will be used to develop and improve the Groups approach to DEI.
- To provide guidance and training to all staff on discussing race in the workplace.
- To encourage each business in the Group to create and foster an environment which expands, celebrates and embraces individuality and diversity where individual differences and contributions are recognised and valued.
- To ensure that you all work in an environment that promotes dignity and respect to all by enforcing zero tolerance to any form of intimidation, bullying, harassment, discrimination or victimisation. Processes are in place to ensure that any violation or potential violation of this nature is escalated to Senior Executive level immediately, taken extremely seriously with no hesitation to take appropriate disciplinary action. In the most serious cases this may lead to more serious consequences.
- To ensure that training, personal development and progression opportunities are transparent, understood by and available to you all.
- To undertake regular review of this policy and all related employment practices and procedures to ensure that they remain current, appropriate, effective and fair.
- To ensure that our commitments to DEI is echoed by our partners and supply chain.
- To ensure that the Board fosters an inclusive culture and leads by example. The Chair of the Board and Nomination Committee is responsible for driving Board diversity and inclusion. The Group’s Nomination Committee is responsible for reviewing the diversity and composition of the Board and Senior Executive on an ongoing basis. The Group is committed to managing Board and Senior Executive diversity through annual long-term Board succession planning and through having an appropriate Board appointment process in place.

8. Communication and awareness of this Policy

The HR Department within each Group business will be responsible for ensuring the communication of this Policy and that training on DEI forms part of their employee training schedule, as applicable. Attendance at training is compulsory.

9. Consequences of Policy violation

As the Group’s businesses operate in many countries, each of which has its unique business, legal and regulatory environment, this Policy does not define a uniform set of sanctions for failure to comply with its requirements. Any violation or potential violation of this Policy will be handled by your local

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HR Department in accordance with the applicable policies governing employee relations and disciplinary measures.

However, any such case will be taken very seriously and the Group will not hesitate to take appropriate disciplinary action (which could result in dismissal for gross misconduct) or report the incident to the relevant authorities, as appropriate.

10. Compliance monitoring, review and continuous improvement

The applicable Divisional Lead or the CEO, as appropriate, will report any purported or potential breach of this Policy to the Group Executive Committee. The CEO will report all serious or continuous non-compliance with this Policy to The Pebble Group Nomination Committee and/or ultimately The Pebble Group Board for its awareness and monitoring on an ongoing basis.

The CEO in conjunction with the Nominated Officer will be responsible for ensuring the suitability, adequacy and effectiveness of this Policy and for making improvements, as appropriate. It will be reviewed and updated where necessary on at least an annual basis.

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