



NuPhotonics

Diversity, Equity, and Inclusion Policy

NuPhotonics is committed to workforce diversity by fostering a culture of inclusion. Our vision is to unite colleagues of vast backgrounds, beliefs, abilities, and experiences and foster an inclusive environment. Our vision is to engage in ways that inspire and take purposeful action to support consumers, customers, and the communities we serve. NuPhotonics strongly believes that Diversity, Equity, and Inclusion (DEI) is everyone's responsibility, including all our employees.

Our DEI policy sets the principles and requirements for our organization to practice. This policy is applicable but not limited to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations and the ongoing development of a work environment built on the premise of gender and diversity equity. This policy applies to all NuPhotonics employees and anyone conducting work on behalf of NuPhotonics.

Our DEI strategy is guided by internal and external insights and input, global best practices, and continuous employee feedback. While diversity may differ by location, inclusion should be the same company wide. Our feedback system allows us to continuously evaluate our DEI policy to ensure that it remains relevant to meet the demands of our employees and communities.

DEI Vision:

Be yourself, embrace your identity, and together we can change the world. Each person's unique experiences, backgrounds, and abilities contribute to better solutions for a better world.

DEI Mission: Every day

We will use it every day as a chance to make DEI our way of doing business. We will always move forward with open hearts and minds to unleash the full potential of all people in all aspects of our business. We will tailor tools and resources to meet individual needs and continuously work at improving our systems and processes to showcase their full potential.

Employee Responsibilities

All employees and contractors of NuPhotonics shall make DEI a part of their daily routine. It requires purposeful action and all shall be responsible for:

- Respecting the dignity of all people.
- Respecting the diversity of all people.
- Enhancing their awareness of potential unconscious bias that may hinder our ability to be more inclusive and collaborative with one another.
- Focus on conscious inclusion.

Leadership Responsibilities

Company managers and supervisors are accountable for specific DEI responsibilities and including DEI outcomes as part of job performance evaluations. Examples of responsibilities include but are not limited to:

- Ensuring that employment decisions are free of discrimination
- Setting DEI goals to foster diverse representation and an inclusive environment
- Engaging in inclusion and other behaviors that promote equity
- Mitigating potential unconscious bias in employment decisions and talent practices
- Creating an inclusive and safe work environment that supports DEI and behaviors that reinforce our company policies.
- Cultivating a work environment that inspires respect for all employees and customers.

Discrimination, Harassment, and Bullying:

NuPhotonics is an equal opportunity employer. NuPhotonics strives to provide equal opportunities for employment to all applicants. We base employment decisions on qualifications, skills, performance and achievements. We do not tolerate discrimination against any employee or applicant for employment based on non-work related performance characteristics such as race, color, religious beliefs, pregnancy, gender, sexual orientation, gender identity or expression, national origin, ethnic origin, age, marital status, disability (physical or mental), medical condition, veteran status/military service, union membership or union activity.

We will provide reasonable accommodation to qualified individuals with a disability as well as individuals with needs related to their religious observance or practice.

We all have the right to work in an environment free from demoralizing effects of harassment or unwelcome offensive or improper conduct. NuPhotonics will not tolerate harassment, bullying, or conduct that will lead or contribute to harassment of employees by managers, supervisors, or co-workers. We actively seek to protect employees from harassment.

Reporting Inappropriate Conduct:

All employees that believe they, or another individual, has been subject to conduct prohibited by the NuPhotonics DEI policy are urged and expected to report the relevant facts promptly. An employee may make a report either orally or in writing.

NuPhotonics takes all allegations of discrimination, harassment, and bullying seriously and ensure they are appropriately investigated. All reported incidents will be investigated with an effort to keep the source of the report confidential. NuPhotonics will then conduct an internal investigation and take appropriate next steps.

Retaliation is Prohibited:

NuPhotonics will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this policy.

Consequences:

Employees from any level, who do not comply with this policy and/or are found to have engaged in discrimination, harassment, or bullying, will be subject to appropriate disciplinary action, up to and including termination of employment.

Considerations:

Consistent with our policy, NuPhotonics will comply with the laws of each country in which we do business. It is the responsibility of the appropriate management and employees to be familiar with and comply with the local equal opportunity laws and regulations which govern the business activities that they engage in. If local law would conflict with this policy, local law must be adhered to.

Right to Terminate or Amend Policy:

NuPhotonics reserves the right to modify, suspend, or change or terminate this policy at any time in accordance with local law. This policy does not create any contractual rights or obligations, whether expressed or implied. Subject to the local law, the English-Language version will prevail.

It is the sole responsibility of the individual to keep up to date with this policy. Only the latest DEI policy will be considered in any scenario including but not limited to misconduct.

Last Updated: December 2023