



Diversity and Inclusion Policy

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Policy owner:	Vice President, Corporate Operations
Approved by:	Board of Directors

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A. Purpose and Scope

This policy establishes the view, approach and responsibilities of Itafos and its subsidiaries (collectively, the “**Company**”) related to diversity and inclusion matters. This policy applies to all Company employees and contractors that do function as employees.

Any policy exceptions must be documented in writing and approved by the policy owner, unless specifically stated otherwise. Subsidiaries of the Company may supplement this policy with additional guidelines or requirements as long as such guidelines or requirements do not conflict with this policy.

This policy should be read in conjunction with the Code of Ethics and Business Practices, the Human Resources Policy, the Compensation Philosophy Policy, the Whistleblower Policy and any other applicable policies of the Company. In the event of any conflict between this policy and the Code of Ethics and Business Practices, the Code of Ethics and Business Practices shall prevail.

If you have any questions about this policy, contact the policy owner directly or email the Legal Department at legal@itafos.com.

B. General Statement

Itafos is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our employees are the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and Company’s achievement as well.

We embrace and encourage our employees’ differences and other characteristics that make our employees unique.

The Company’s diversity and inclusion initiatives are 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 diversity and inclusion that encourages and enforces:

- Respectful communication and cooperation between all employees
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives
- Work/life balance through flexible work schedules to accommodate employees’ varying needs
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity and inclusion

C. Responsibilities

All Company employees have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other Company-sponsored and participative events. All employees are also

required to attend and complete Company-sponsored diversity and inclusion awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others will be subject to a disciplinary review process and may be subject to disciplinary action. Employees who believe they have been subjected to any kind of discrimination that conflicts with the Company's diversity and inclusion policy and related initiatives should seek assistance from a supervisor, an HR representative or the policy owner.

Further, you are encouraged to ask questions and expected to report concerns of suspected violations to this policy. Refer to the Whistleblower Policy for more information related to reporting concerns.

The Board of Directors ("**Board**") has reviewed and approved this Policy. The Governance and Nominating Committee is responsible for reviewing this Policy annually, updating this Policy as required and reporting to the Board with respect to this Policy from time to time.
