



New Era Technology, Inc. Equality, Diversity & Inclusion Policy 2024

Classification: Public

V.2.0 September 2024

Equality, Diversity & Inclusion Policy Statement

New Era Technology, Inc., and its subsidiaries (the “Company” or “New Era”) operate in a wide range of legal and business environments. The purpose of this Equality, Diversity and Inclusion Policy (the “Policy”) is to encourage and enable directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy (for these purposes, each shall be referred to as an “Employee”), to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

We are committed to encouraging equality, diversity, and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each Employee to feel respected and able to give their best.

In providing our services, New Era Technology is also committed against unlawful discrimination of customers or the public.

Contents

Equality, Diversity & Inclusion Policy Statement.....	1
1. Terms and Definitions	3
2. Scope.....	3
3. Roles and Responsibilities	3
4. Policy.....	4
Regulation and Legislation.....	5
Forms of Discrimination.....	5
Direct Discrimination	5
Indirect Discrimination	5
Bullying and Harassment	6
Employment.....	6
Recruitment, Advertising, and Selection	7
Promotions	7
Terms of employment, benefits, facilities, and services	7
Clients, Suppliers, and Other Third Parties.....	7
Clients.....	8
Suppliers and Other Third Parties	8
5. Reporting Complaints.....	8
6. Compliance, Monitoring and Enforcement	8
Appendix A: Complaint Procedure	10
Document Information.....	11
Document History	11
Control of Hardcopy Versions.....	11
References	12

1. Terms and Definitions

Term / Acronym	Definition / Meaning
“diversity”	The visible and invisible differences that exist between people.
“Employee”	Directors, officers and workers of the Company, including independent contractors in the United States and other countries as applicable to the extent they are covered by relevant local laws and legislation in relation to this Policy.
“equity”	Ensuring that everyone within the workplace is treated in a fair manner and has an equal opportunity at work.
“ESG Committee” or “Environmental, Social and Governance Committee”	Includes, but is not limited to, representatives from Human Resources, Corporate Development and GRC (Governance, Risk and Compliance) teams.
“inclusion”	Ensuring that Employees and members enjoy equal opportunity without any barriers due to their differences.
“protected characteristics”	In this Policy, refers to a person’s age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including color, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.
“we”, “our”, “New Era”, “New Era Technology”, “us” or “Company”	Refers to New Era Technology, Inc., and its subsidiaries.

2. Scope

This Policy applies to all New Era Technology Employees, regardless of location (within or outside of the jurisdictions in which the Company operates).

We may have additional supplementary regional Equality, Diversity and Inclusion policies that could address legislation specific to that country and/or region.

This Policy does not form part of any Employee’s contract of employment, and New Era reserves the right to amend the Policy at any time.

3. Roles and Responsibilities

This Policy has been agreed upon and implemented following review and approvals from New Era Technology’s executive leadership team. The Chief Executive Officer (CEO) has overall responsibility for the effective operation of this Policy. The CEO has delegated responsibility for overseeing the implementation of the Policy to representatives from the Human Resources, Corporate Development and Governance, Risk & Compliance (GRC) teams (“ESG Committee”). Suggestions for changes to this Policy should be reported to GRC@neweratech.com.

All Employees are responsible for conducting themselves in accordance with this Policy.

Managers have day-to-day responsibility for enforcing this Policy, and Employees should refer any questions about this Policy to their manager.

This Policy is reviewed annually by members of the ESG Committee. Changes may be made at any time as government guidance develops.

4. Policy

New Era Technology is committed to eliminating discrimination and promoting equality and diversity in its own policies, practices and procedures and in those areas in which it has influence. This applies to all aspects of the Company's professional dealings with Employees. As well as employment aspects, including recruitment and selection, promotion, opportunities for training, benefits, other terms of employment, disciplinary matters, discipline, selection for redundancy and dismissal.

New Era Technology is an equal opportunity employer and is fully committed to a policy of treating everyone equally. We strive to create and foster a supportive environment where Employees can realize their potential regardless of their differences.

We will take all reasonable steps to employ, train and promote our Employees on the basis of their experience, abilities and qualifications. We will treat everyone fairly and equally and with the same attention, courtesy and respect and will not discriminate without lawful cause against any person, nor victimize or harass them on the grounds of the following characteristics, including, but not limited to:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (Including color, nationality and ethnic or national origins)
- Religion or belief
- Sex or sexual orientation

In this Policy, these are known as the "protected characteristics".

New Era will also take all reasonable steps to provide a work environment in which all Employees are treated with fairness, respect and dignity and that is free from harassment and bullying.

As a global organization New Era employs people from many different cultural, linguistic, and national backgrounds. While we believe that this diversity adds value to our business and provides us with knowledge

and understanding of international markets, it is critical that all Employees respect this diversity in their peers.

Regulation and Legislation

In developing and implementing this Policy, New Era Technology will comply with equality, diversity and anti-discrimination legislation and associated codes of practice in all countries in which we operate.

In principle, these laws and regulations commonly require that Employees and customers have a right to be treated fairly as well as prohibitions pertaining to discrimination based on protected characteristics. The laws and regulations in each country define the various kinds of discrimination with reference to the characteristics which are protected under the relevant legislature.

Forms of Discrimination

Direct Discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a person is treated less favorably than others are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the person is associated and not on the individual's own protected characteristic. In addition, it can include cases where it is perceived that a person has a particular protected characteristic when in fact they do not.

New Era Technology will take all reasonable steps to eliminate direct discrimination in all aspects of its professional dealings.

Indirect Discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all individuals, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the person a provision, criterion, or practice (PCP) which is discriminatory in relation to a protected characteristic of the person. A PCP is discriminatory in relation to a protected characteristic of the person if:

- It is applied, or would be applied, to persons with whom the individual does not share the protected characteristic.
- The PCP puts, or would put, persons with whom the individual shares the protected characteristic at a particular disadvantage when compared with persons with whom the individual does not share it.
- It puts, or would put, the individual at that disadvantage.

- It cannot be shown by New Era to be a proportionate means of achieving a legitimate aim.

New Era Technology will take all reasonable steps to eliminate indirect discrimination in all aspects of its professional dealings.

Bullying and Harassment

Bullying is offensive or intimidating behavior or an abuse or misuse of power which undermines or humiliates a person and that occurs in the workplace and in any work-related setting.

Harassment is unwanted behavior and can take many forms including inappropriate actions and behaviors, comments or physical contact that is objectionable or causes offence. In some cases, harassment related to any of the protected attributes may be unlawful based on local legislation. Harassment can occur whether or not it is intended.

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behavior include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favors, other conduct of a sexual nature.
- Subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to an anti-harassment protected characteristic.
- The offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- Comments, gestures, jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic.
- Demeaning comments about an Employee's appearance.
- Questions about an Employee's sex life.
- The use of nicknames related to a protected characteristic whether made verbally or by written communication.
- Picking on or ridiculing an Employee because of a protected characteristic.
- Isolating an Employee or excluding them from social activities or relevant work-related matters because of a protected characteristic.
- Initiation practices.
- Sabotaging someone's work.

Employment

Recruitment, Advertising, and Selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities, and qualifications.

New Era Technology is committed to applying its Equality, Diversity & Inclusion policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, New Era will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

The selection process will be carried out consistently for all applicants applying for the same role. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do or to train for the job in question.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any protected characteristics.

Promotions

Where a promotional system is in operation, it will not be discriminatory, and it will be checked from time to time to assess how it is working in practice. When a group of workers who predominantly have a particular protected characteristic appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

Terms of employment, benefits, facilities, and services

All terms of employment, benefits, facilities, and services will be reviewed from time to time, to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

New Era Technology will have regard to its duty to make reasonable adjustments to work provisions and practices or to physical features of work premises or to provide auxiliary aids or services to ensure that disabled Employees are not placed at a substantial disadvantage in comparison with persons who are not disabled. No costs of any such adjustments will be passed on to the Employee.

Clients, Suppliers, and Other Third Parties

Clients

New Era Technology is generally free to decide whether to accept instructions from any particular client, but any refusal to act will not be based upon any protected characteristics. New Era will take steps to meet the different needs of particular clients arising from its obligations under anti-discrimination legislation. In addition, where necessary and where it is permitted by the relevant anti-discrimination legislation (for example, provisions relating to positive action or exemptions) New Era will seek to provide services that meet the specific needs and requests arising from a protected characteristic.

Suppliers and Other Third Parties

All lists, if any, of approved suppliers and databases of contractors, agents and other third parties who, or which, are regarded as suitable to be instructed by those within New Era have been or will be compiled only on the basis of the ability of those persons or organizations to undertake work of a particular type and do not or will not contain discriminatory exclusion, restriction or preference.

5. Reporting Complaints

If Employees have any concerns, suspect discriminatory acts or practices, or suspect any cases of harassment or bullying or wish to make a complaint of discrimination, they should speak to their direct manager or the Human Resources department. The Employee may also file a complaint, in writing, in accordance with their local complaint/grievance procedures or where one does not exist, use the Complaint Procedure (Appendix A). If unsure which procedure to follow, ask your local Human Resources team.

6. Compliance, Monitoring and Enforcement

This Policy is intended for all New Era businesses, in all countries.

Employees must ensure that they read, understand and comply with this Policy.

New Era Technology seeks to proactively prevent and mitigate instances of non-compliance with this Policy.

New Era Technology's ESG committee is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to GRC@neweratech.com.

The prevention, detection and reporting of discrimination, harassment or bullying in any part of our business or supply chains is the responsibility of all those working for us or under our control and we are all required to avoid any activity that might lead to, or suggest, a breach of this Policy.

New Era Employees who violate or breach this Policy are subject to disciplinary action, up to and including dismissal. Employees should also note that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

New Era will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its Employees and may be subject to termination of all commercial relationships with New Era.

Appendix A: Complaint Procedure

If an Employee is subjected to, or if an Employee witnesses conduct the Employee believes to be unlawful or conduct that is believed to be in violation of this Policy, the Employee must report this conduct to the Employee's direct manager or Human Resources at the earliest opportunity. If the conduct involves the Employee's direct manager, or if the Employee believes it would be inappropriate to report the conduct to the direct manager, then the Employee must report this conduct to another member of the management team or Human Resources at the earliest opportunity. The complaint should be as detailed as possible, including all pertinent facts and circumstances, the names of all individuals involved, and the names of all witnesses.

No Employee shall be discharged or retaliated against in any manner because that Employee made a bona fide complaint in compliance with this Complaint Procedure or assisted in the investigation of a complaint.

Once a complaint is received, the Company will conduct an impartial investigation in compliance with the law. All Employees are required to cooperate in these investigations by, for example, providing all pertinent information to the Company. Although the facts gathered during the investigation and the Company's findings will be considered confidential, information will be shared on a need-to-know basis.

Any Employee who is found to have engaged in improper conduct shall be subject to disciplinary action, up to and including termination, depending on the circumstances.

If an Employee has made a complaint which has not been promptly handled, or if the results of the investigation or disposition of the complaint is not satisfactory, the Employee should report the basis for the dissatisfaction to the Employee's manager, another member of the management team or Human Resources at the first opportunity.

Employees must be truthful in reporting complaints and providing information during an investigation. An Employee who knowingly and intentionally makes a false complaint under this Policy or intentionally provides false information during an investigation of a complaint will be subject to discipline, up to and including termination.

Document Information

Reference	ESG Framework
Title	Equality, Diversity & Inclusion Policy
Purpose	The purpose of this Policy is to: <ol style="list-style-type: none"> 1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense. 2. Create a working environment free of bullying, harassment, victimization and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all Employees are recognized and valued.
Owner	Chief Executive Officer (CEO)
Document Approvers	New Era Technology's executive leadership team
Intended Audience	New Era Technology permanent, temporary, and contracted staff and in certain instances, independent contractors; New Era Suppliers and third parties.
Review Plan	Annually
Document Classification	Public

Document History

VERSION CONTROL			
Revision	Date	Record of Changes	Released/Released By
V1.0	Jan 1, 2024	Approved release	ESG Committee
V2.0	Sep 16, 2024	Document owner/approvers updates	ESG Committee

Control of Hardcopy Versions

The digital version of this document is the most recent version. It is the responsibility of the individual to ensure that any printed version is the most recent version. The printed version of this document is uncontrolled, and cannot be relied upon, except when formally issued by the Chief Executive Officer, and /or the Director of Governance, Risk, and Compliance and provided with a document reference number and revision in the fields below:

Document Ref.	Rev.	Uncontrolled Copy	X	Controlled Copy
---------------	------	-------------------	---	-----------------

References

Standard / Framework / Other	Title	Description
New Era Technology Corporate Policy	Employee Handbook	Code of Ethics and Business Conduct: a set of rules that details New Era's values, ethics, and beliefs including the rules that govern legal compliance.
New Era Technology Corporate Policy	Employee Handbook	Policies, in addition to the Code of Ethics and Business Conduct, including but not limited to Equal Employment Opportunity policy; Anti-Discrimination And Anti-Harassment Policy; "Whistleblower" Protection policy; Anti-Retaliation policy; Complaint Procedure; Open Door Policy; Standards of Conduct; Electronic Information and Communications policy; Confidential Information policy; Customer Relations policy.
New Era Technology Corporate Policy	CSR Policy	The purpose of this policy is to communicate New Era Technology's commitment to taking responsibility for our actions and encourage a positive contribution towards improving standards for our clients and Employees, minimizing our impact on the environment and improving the quality of the local community.
New Era Technology Corporate Policy	ESG Policy	The purpose of this policy is to provide information about ESG (Environmental, Social and Governance) factors and to encourage the business to understand ESG better.
New Era Technology Corporate Policy	Anti-Bribery & Anti-Corruption Policy	The purpose of this policy is to set out the responsibilities of New Era and those who work for us about observing and upholding our zero-tolerance position on bribery and corruption. The policy is also intended to act as a source of information and guidance for those working for New Era. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.
New Era Technology Corporate Policy	Modern Slavery (Anti-Slavery and Human Trafficking) Policy	The purpose of this policy is to ensure New Era's compliance with obligations under the Modern Slavery legislation, reducing modern slavery risks posed to the business.
New Era Technology Corporate Policy	Whistleblowing Policy	Ensures that an Employee can raise concerns about wrongdoing or misconduct within New Era without fear of victimization, subsequent discrimination, disadvantage or dismissal.