

## **EQUALITY, DIVERSITY & INCLUSION POLICY**

Avon Specialty Metals (ASM) is committed to promoting equality, diversity, and inclusion throughout all aspects of our operations. As a specialist in recycling end-of-life superalloys and commercially pure elementals, we recognise the value that diverse perspectives and experiences bring to our business and the wider metals industry. We are dedicated to ensuring that all of our employees, applicants, our contractors, and partners are treated fairly and with respect, regardless of age, gender, race, disability, religion, sexual orientation, or any other protected characteristic. Our recruitment, training, promotion, and working practices are designed to offer equal opportunity based on merit, competence, and business need, while also making reasonable adjustments to support inclusion and accessibility.

We foster a workplace culture where everyone feels safe, respected, and empowered to contribute. Discrimination, bullying, and harassment will not be tolerated under any circumstances, and any breaches of this policy will be dealt with promptly and appropriately. We provide clear reporting procedures and encourage all staff to raise concerns without fear of retaliation. Through regular monitoring and continuous improvement of our policies and practices, ASM aims to lead by example in creating a more inclusive and equitable environment within the metals recycling sector.

### **SCOPE AND COMMITMENT**

This policy applies to all ASM employees, workers, job applicants, contractors, agency staff, and business partners. It covers every aspect of employment, including recruitment and selection, terms and conditions, pay and benefits, training and development, promotion, performance management, discipline, grievance handling, and termination. This policy is approved by the Chief Executive Officer, is communicated to all staff at induction and made available to all personnel, and applies equally to our expectations of contractors, suppliers, and other third parties acting on ASM's behalf.

### **PROTECTED CHARACTERISTICS**

ASM prohibits discrimination, harassment, or victimisation on the grounds of age, sex, gender reassignment, race, colour, nationality, ethnic or national origin, disability, religion or belief, sexual orientation, marriage or civil partnership status, pregnancy or maternity, caste, HIV/AIDS or other health status, trade union membership or activity, political opinion, and parental or family responsibilities, as well as any other characteristic unrelated to a person's ability to do their job.

## **RECRUITMENT AND SELECTION**

Recruitment decisions are based on objective, job-related criteria and individual merit. We review job descriptions and advertisements to avoid discriminatory language and use inclusive imagery. We aim to draw from a wide range of recruitment channels to reach diverse candidate pools, and hiring managers receive guidance on non-discriminatory interviewing and selection practices. Candidates who require reasonable adjustments during the recruitment process, including for interviews or assessments, are invited to raise this with HR in confidence, and no medical information is requested other than where required to assess a reasonable adjustment or as required by law.

## **PROMOTION, TRAINING AND DEVELOPMENT**

Promotion and access to training and development opportunities are based on transparent, merit-based criteria and are available to employees at all levels. Performance is assessed against objective, job-related measures. Disciplinary and dismissal decisions follow a consistent procedure regardless of any protected characteristic.

## **PAY AND BENEFITS**

ASM is committed to equal pay for equal work or work of equal value, irrespective of gender or any other protected characteristic. Pay and benefits decisions are reviewed periodically to identify and address any unexplained disparities, and any concerns raised regarding pay equity will be investigated.

## **WORKING CONDITIONS AND FLEXIBILITY**

Where operationally practicable, ASM supports flexible working arrangements, including flexible hours and part-time working, and considers all reasonable requests fairly and consistently. We provide statutory maternity, paternity, shared parental, adoption, and carer's leave, and will consider requests for leave to accommodate religious observance or other personal circumstances on a case-by-case basis. Health and disability information disclosed by an employee is kept confidential and shared only on a need-to-know basis, and dietary or accessibility needs are accommodated at company events wherever reasonably possible.

## **PREVENTING HARASSMENT, BULLYING AND VIOLENCE AT WORK**

Discrimination, bullying, harassment, and violence at work, including gender-based violence and harassment, will not be tolerated under any circumstances, whether committed by a colleague, manager, contractor, supplier, customer, or other third party. This is addressed within our health and safety management arrangements alongside physical risks.

## **GRIEVANCE, REPORTING AND NON-RETALIATION**

Employees, workers, and contractors can raise concerns about discrimination, harassment, or breaches of this policy through our grievance procedure or, where preferred, our confidential whistleblowing arrangements. Complaints are handled in confidence, investigated promptly and fairly, and the person raising a concern is kept informed of the outcome so far as appropriate. ASM will not tolerate retaliation against anyone who raises a concern in good faith or supports another person's complaint, and this protection extends to temporary and agency workers.

## **TRAINING AND AWARENESS**

All employees receive equality, diversity and inclusion training as part of induction, with refresher training provided periodically and additional guidance given to managers on their responsibilities for fair recruitment, people management, and handling concerns raised under this policy.

## **EMPLOYEE VOICE**

ASM welcomes feedback from employees on how this policy operates in practice and will consult staff, directly or through employee representatives, when reviewing this policy or related working practices.

## **MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT**

ASM monitors workforce composition and reviews recruitment, promotion, pay, training, and grievance outcomes to identify trends and areas for improvement, and any personal data collected for this purpose is handled in line with our data protection policy. Progress against this policy is reviewed by senior management, and this policy itself is reviewed periodically to ensure it remains effective and reflects current legislation and good practice, including the principles of the United Nations Global Compact, of which ASM is a signatory.

## **SUPPLIERS AND BUSINESS PARTNERS**

ASM expects its suppliers, contractors, and business partners to uphold equivalent standards of non-discrimination and equality in their own operations, and we will consider this when developing our procurement and supplier management practices.

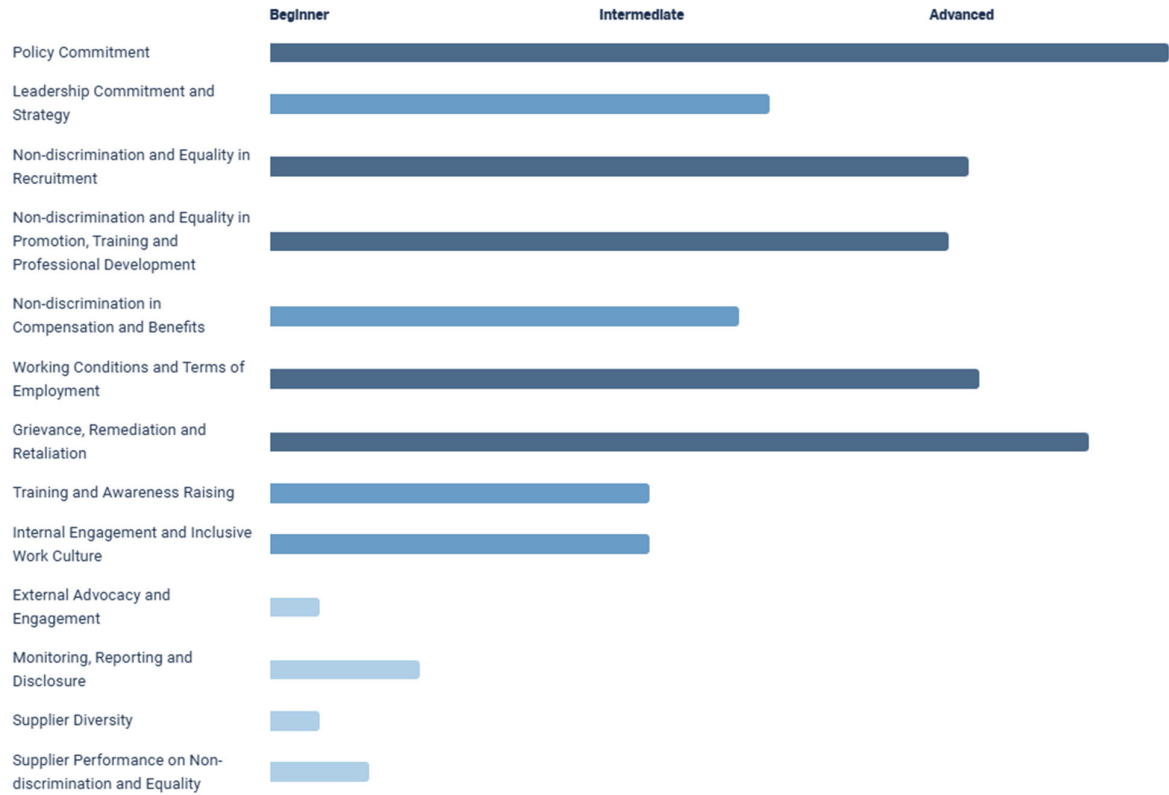
ASM is also committing to take active steps on supplier diversity, including consideration of minority-owned and women-owned businesses in new supplier identification from 2026. Further detail is set out in ASM's Procurement Policy (Section 3, Supplier diversity).

**UNITED NATIONS GLOBAL COMPACT**

**Non-Discrimination and Equality Progress Report**

<https://ndetool.unglobalcompact.org/assessment/results/e96235d0-8f43-4c40-8739-5b722a1cc361>

**Progress per area**



Steven Munnoch

Chief Executive Officer

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