

Equal Opportunity Employment Policy

Version: 2025-01

Company: NMT

Region: Global (EN)

Effective Date: 07 December 2025

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1. Purpose and Commitment Statement

NMT is committed to fostering a diverse, inclusive, and equitable workplace where individuals are treated fairly, respectfully, and without bias. This policy establishes the organization's commitment to ensuring that all employment practices—including recruitment, promotion, compensation, training, and workplace conduct—reflect principles of equal opportunity.

The policy ensures that every employee, regardless of background or identity, has the support, resources, and opportunities needed to reach their full potential. NMT strives to eliminate systemic barriers, encourage representation, and uphold human rights across all global operations.

2. Guiding Principles

1. **Fairness** – Employment decisions must be objective, consistent, and free from prejudice.
 2. **Transparency** – Processes, criteria, and expectations must be clearly communicated and accessible.
 3. **Inclusion** – Every individual must feel valued and empowered to contribute meaningfully.
 4. **Merit-Based Practices** – Decisions around hiring, promotion, and rewards must be grounded in performance, qualifications, and demonstrated potential.
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3. Scope

This policy applies to:

- Full-time, part-time, and temporary employees
- Job applicants and candidates
- Interns, trainees, and apprentices

- Contractors, consultants, and external partners
- Participants in company-sponsored programs or activities

It governs all employment practices and organizational interactions globally.

4. Prohibited Grounds of Discrimination

NMT strictly prohibits discrimination on the basis of:

- Gender
- Race
- Ethnicity
- Religion or belief
- Disability (physical, mental, or neurodivergent)
- Age
- Sexual orientation
- Gender identity or expression
- Marital or civil status
- Parental or caregiving status
- Nationality or country of origin
- Political belief (where legally applicable)
- Union membership or lawful collective activities

This list reflects global standards while accommodating jurisdictional variations.

5. Definitions

Discrimination

Unequal or unfavorable treatment of an individual based on a protected characteristic, whether intentional or unintentional.

Harassment

Unwelcome conduct—verbal, physical, digital, or visual—that creates an intimidating, hostile, or offensive environment.

Bias

A tendency, conscious or unconscious, that affects judgment or decision-making and may influence employment outcomes unfairly.

Inclusivity

The practice of ensuring that all individuals feel respected, heard, and integrated into workplace activities and decisions.

Equity vs. Equality

- *Equity*: Providing tailored support or adjustments to ensure fair outcomes.
 - *Equality*: Treating everyone the same regardless of differing needs or circumstances.
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6. Recruitment and Hiring Practices**6.1 Job Postings**

- Open roles must be posted internally and externally to ensure broad access.
- Job descriptions must clearly state essential qualifications, responsibilities, and required competencies, avoiding biased or exclusionary language.

6.2 Selection Criteria

- All hiring decisions must be based solely on job-related skills, experience, and performance indicators.
- Selection processes must incorporate objective, structured evaluation frameworks.

6.3 Interviews

- Panels should reflect diverse perspectives wherever possible.
- Interviewers must apply consistent criteria and utilize unbiased interviewing techniques.
- Documentation must reflect fair and consistent evaluation of each candidate.

6.4 Reasonable Accommodations

- NMT provides accommodations for applicants and employees with disabilities, religious observances, or other lawful needs, ensuring equal access to hiring and employment.
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7. Employment Terms

7.1 Training

- DEI training is mandatory during onboarding and reinforced through periodic learning programs.
- Additional targeted workshops support continuous development and awareness.

7.2 Promotions

- Promotion decisions are based on demonstrated performance, capabilities, and potential.
- Processes must be transparent, merit-driven, and free of favoritism or bias.

7.3 Pay Equity

- Compensation structures are reviewed regularly to identify and correct inequities.
- Pay decisions must align with objective criteria and comply with applicable laws.

7.4 Benefits

- NMT offers benefits that consider the diverse needs of employees, accommodating global variations and cultural differences.

7.5 Flexible Arrangements

- Reasonable consideration is given to flexible work arrangements supporting work-life balance, subject to operational needs and compliance standards.

8. Workplace Culture and Inclusivity Programs

NMT fosters an inclusive workplace through structured programs such as:

- Employee Resource Groups (ERGs) supporting marginalized and affinity communities
- Diversity and inclusion workshops, seminars, and awareness campaigns
- Mentorship and sponsorship programs aimed at increasing representation and leadership diversity

These programs strengthen belonging, support collaboration, and encourage cross-cultural engagement.

9. Reporting and Handling Complaints

9.1 Process

1. Initial reporting to supervisor, HR representative, or designated reporting channel.
2. Submission of formal complaint if the issue is unresolved or requires further investigation.

9.2 Timelines

- Acknowledgment provided within **5 business days**.
- Investigations typically completed within **30 days**, subject to complexity.

9.3 Confidentiality

- All complaints are handled discreetly, with information shared only on a need-to-know basis.

9.4 Non-Retaliation

- Retaliation against employees who report concerns or participate in investigations is strictly prohibited and subject to disciplinary action.

10. Investigation Process and Corrective Actions

- HR conducts impartial investigations, gathering evidence, interviewing relevant parties, and maintaining thorough documentation.
- Corrective measures may include coaching, mediation, policy reinforcement, or disciplinary actions—including termination—depending on severity and findings.

11. Role of HR, Line Managers, and Compliance

HR

- Oversees policy implementation, training programs, and complaint resolution.
- Ensures alignment with legal, regulatory, and organizational standards.

Line Managers

- Promote inclusive team environments and address issues promptly.
- Support development and fair evaluation of team members.

Compliance

- Ensures adherence to global legal requirements and internal compliance frameworks.
 - Conducts audits, advises on risk mitigation, and oversees monitoring mechanisms.
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12. Monitoring, Audits, and Reporting

- Diversity metrics—including hiring trends, promotion rates, and retention indicators—are monitored regularly.
 - Periodic audits assess policy effectiveness, identify areas for improvement, and ensure equitable practices across the organization.
 - Key performance indicators (KPIs) are shared with leadership to drive accountability.
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13. Policy Governance and Review Cycle

This policy is reviewed annually to ensure alignment with evolving legal standards, global best practices, and organizational priorities. Updates are communicated transparently to all employees.

14. Realistic Scenarios

14.1 Promotion Bias

An employee is overlooked for promotion due to unconscious bias. HR investigates and mandates additional training for the manager while revisiting promotion criteria.

14.2 Religious Accommodation

An employee requests leave for a religious holiday. HR works with management to ensure reasonable accommodation in line with company policy.

14.3 Disability Support

An employee requires ergonomic equipment to perform essential job duties. HR assesses the request and ensures appropriate accommodations are provided.

15. Complaint Process Flowchart

1. Incident Occurs

2. Initial Reporting
 3. Formal Complaint
 4. Acknowledgment
 5. Investigation
 6. Resolution
 7. Follow-Up
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16. Example Templates

16.1 Complaint Form

- Name
- Date
- Department
- Description of Incident
- Names of Witnesses
- Preferred Resolution

16.2 Manager's Acknowledgment

- Employee Name
 - Date of Complaint
 - Manager Name
 - Signature and Date
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17. Appendix

References:

- International Labour Organization (ILO) Standards
- European Union Equality Directives
- U.S. Equal Employment Opportunity Commission (EEOC) Guidelines

This Equal Opportunity Employment Policy reaffirms NMT's commitment to fairness, equity, diversity, and non-discrimination across all employment practices globally.