Dempsey Corporation

Diversity, Equity, and Inclusion (DEI) Policy

Effective Date: January 23, 2025

Version: Public Web Version

Our Commitment

At Dempsey Corporation, we believe that diversity, equity, and inclusion are foundational to our values and business success. We are committed to creating and maintaining a respectful, inclusive, and equitable workplace where all individuals are valued, empowered, and treated with dignity.

This policy outlines our approach to embedding DEI across our operations, in compliance with Canadian provincial privacy and human rights legislation.

Scope

This policy applies to all employees, contractors, and job applicants at Dempsey Corporation, across all Canadian operations. It also guides how we interact with suppliers, partners, and the communities we serve.

Guiding Principles

Non-Discrimination

Dempsey does not tolerate discrimination based on race, ethnicity, gender, age, disability, sexual orientation, gender identity or expression, religion, family status, or any other protected ground as defined by applicable provincial human rights codes (e.g., Ontario Human Rights Code, BC Human Rights Code).

Equal Opportunity

We are committed to fair and equitable recruitment, development, and advancement. Our hiring, promotions, and compensation practices are designed to ensure all individuals are evaluated based on qualifications, merit, and performance.

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Inclusive Workplace Culture

We foster an environment where differences are respected, valued, and leveraged. This includes:

Supporting inclusive team collaboration

Recognizing diverse holidays and observances

Encouraging diverse perspectives in decision-making

Voluntary DEI Data Collection

To support our DEI goals and monitor inclusion efforts, Dempsey may, from time to time, invite employees to participate in voluntary demographic surveys. These efforts are governed by the following principles:

Legal Justification:

Data is collected only for legitimate, equality-related purposes, such as identifying barriers to inclusion and monitoring equity progress.

Consent and Transparency:

Participation is strictly voluntary. Employees are informed about the purpose, use, and storage of any information collected and may withdraw at any time.

Confidentiality:

All data is anonymized, aggregated, and handled in accordance with applicable provincial privacy laws (e.g., PIPA in BC/Alberta, Quebec's Act, and PIPEDA).

No Adverse Impact:

Data will not be used to make individual employment decisions and will be accessed only by authorized personnel for inclusion reporting and analysis.

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Sample DEI Survey Language

As part of our DEI efforts, employees may see a message like this:

"As part of our commitment to fostering diversity and complying with Canadian human rights principles, we are collecting voluntary, confidential information about employees' backgrounds. The data will be anonymized and used solely to support our inclusion goals. Participation is entirely optional."

Survey options may include self-identification from categories aligned with the Canadian Employment Equity Act, such as:

Indigenous (First Nations, Métis, Inuit)

Black (African, Caribbean, etc.)

Latin American

South Asian, East Asian, Southeast Asian

Middle Eastern or West Asian

White (European descent)

Other / Prefer not to disclose

Training and Awareness

All staff receive training as part of onboarding that covers respectful workplace conduct and DEI principles. Managers receive additional training on inclusive leadership and mitigating unconscious bias.

Governance and Accountability

Our DEI commitments are overseen by Human Resources in collaboration with the ESG Committee. Dempsey's leadership is responsible for fostering an inclusive workplace and ensuring this policy is upheld throughout the organization.

Progress on DEI initiatives is communicated through our internal programs and summarized in our Annual ESG Report.