



PHOTON<sup>®</sup>

# SUPPLIER DIVERSITY POLICY



# Table of Contents

1	Scope	1
2	Objectives of the policy	2
3	Appendix A: Countries in scope	3
4	Appendix B: Diverse Supplier Spend Report format (Quarterly)	5

# 1. Scope

---

Photon is committed to providing opportunities for qualified businesses owned by people of diverse backgrounds to participate as suppliers of products and services to our company. This Policy outlines the principles under which Photon will engage Diversity Suppliers. This diversity policy shall help us define, strategize, plan, and implement the essential roadmap, guidance, and measurement towards bridging the gaps as we work on different facets that have a bearing on achieving diversity goals. This policy is forward looking and sets a vision for diversity and inclusion for businesses across the company. This Policy covers all employees and contractors within the organization.

Photon Supplier Diversity Program will be administered and managed by the Photon's Vendor Management Organization (VMO), with oversight from the Top Management, Diversity & Inclusion. Our leadership and employees are committed to adopting procurement processes and practices that will enhance opportunities for Diverse Suppliers, as defined in Appendix A, to fairly compete to be engaged by Photon.



## 2. Objectives of the policy

---

The primary goals of Photon's Supplier Diversity Program are to:

Provide opportunities to Diverse Suppliers who may otherwise be excluded from sourcing opportunities due to physical, social, or cultural reasons, while also:

Satisfying our procurement standards.

- Creating long-term value for our clients and our communities.
  - Providing competitively priced and reliable goods and services.
  - Helping us remain agile, disruptive, and ahead of the market; and
  - Complying with Photon's Supplier Standards of Conduct
- 
- Communicate the value of supplier diversity both internally and externally to all stakeholders.
  - Leverage our supplier diversity to meet our corporate customers' supplier diversity requirements.
  - Photon's sourcing departments are encouraged to identify and include diverse suppliers and service providers in sourcing decisions.
  - Photon's commitment to supplier diversity is not philanthropic, nor does it contradict the application of existing purchasing goals, policies and procedures. The award of opportunities to Diverse Suppliers will be based on criteria established as part of the sourcing request or other criteria that may arise from time to time, including, but not limited to their relative competitiveness, the value of their offerings, and their demonstrated performance.
  - All Diverse Suppliers must be so certified by a third-party agency (or commit to obtaining such certification within the first year of engagement).
  - To be characterized or defined as a Diverse Supplier, a business must meet one or more criteria that differ by country and may be found in the appendix to this policy.
- 
- Photon will report Diverse Supplier spend quarterly to our clients on a requested in the format displayed in Appendix B to this policy.

# 3. Appendix A: Countries in scope

---

## **United States, UK, and India:**

To be characterized or defined as a Diverse Supplier in the United States, UK and India a business must meet one or more of the following criteria:

**Minority Business Enterprise (MBE)** – A Minority Business Enterprise usually certified by a federal, state, or local government agency as having met all of the government standards that award eligibility. (US and UK).

**Woman Business Enterprise (WBE)** – A Women Business Enterprise usually certified by a federal, state, or local government agency as having met all the government standards that award eligibility. (US and UK).

**Veteran Business Enterprise (VBE)** – Under SBA Guidelines Small Business Act (PL 85-536) as amended states: Small Business Concerns owned and controlled by veterans not less than 51% owned by one or more veterans and in the case of a publicly owned business not less than 51% of the stock is owned by one or more veterans. (US and UK).

**Disabled Veteran Business Enterprise (DVBE)** – A disabled veteran recognized by the state of California as a veteran of the U.S. military, naval, or air service, with a service-connected disability of at least 10% or more and who is a California resident. Where at least 51% is owned by disabled veterans and conducts daily business management and control. The home office cannot be a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business. (US)

**Disabled Owned (DO)** – A business that is at least 51% owned by one or more disabled persons who control and operate the business. Control in this context means exercising the power to make policy decisions and operate means to be actively involved in the day-to-day management of the business. (US and UK).

**LGBTQ Owned (LGBTQ O)**– A business that is at least 51% owned by one or more LGBTQ persons who control and operate the business. Control in this context means exercising the power to make policy decisions and operate means to be actively involved in the day-to-day management of the business. (US and UK).

**Service-Disabled Veteran-Owned Small Business** – The Department of Defense (DoD) has undertaken an outreach effort to identify small businesses owned and controlled by veterans and service-disabled veterans. (US)

**Self-Certified Small Disadvantaged Business** – The firm must be 51% or more owned and controlled by one or more disadvantaged persons. The disadvantaged person or persons must be social. (US)

**Historically Underutilized Businesses** – Historically Underutilized Businesses means minority businesses in which at least fifty-one percent (51%) is owned by one or more minority persons or socially and economically disadvantaged individuals and whose management and daily business operations are controlled by one or more such persons. (US)

**Small Business** - Affiliation with another business is based on the power to control, whether exercised or not. The power to control exists when an external party has 50% or more ownership. It may also exist with considerably less than 50% ownership by contractual arrangement, or when one or more parties own a large share compared to other parties. Check the SBA's compliance guide for size and affiliation for more detailed information. (UK).

**Micro, Small or Medium Enterprises** – MSME's crucial for global economic development, vary in size based on investment and turnover, playing a pivotal role in fostering innovation and inclusive growth with criteria differing by country. (India).

# 4. Appendix B: Diverse Supplier Spend Report format (Quarterly)

Row Labels	Spend Q1 20XX	Spend Q2 20XX
Minority Business Enterprise	\$X,XXX,XXX	\$X,XXX,XXX
Woman Business Enterprise	\$X,XXX,XXX	\$X,XXX,XXX
Veteran Business Enterprise	\$X,XXX,XXX	\$X,XXX,XXX
Disabled Veteran Business Enterprise	\$X,XXX,XXX	\$X,XXX,XXX
Disabled Owned	\$X,XXX,XXX	\$X,XXX,XXX
Service-Disabled Veteran Owned	\$X,XXX,XXX	\$X,XXX,XXX
LGBTQ-Owned	\$X,XXX,XXX	\$X,XXX,XXX
Self-Certified Small Disadvantaged Business	\$X,XXX,XXX	\$X,XXX,XXX
Historically Underutilized Businesses	\$X,XXX,XXX	\$X,XXX,XXX
Micro, Small or Medium Enterprises	\$X,XXX,XXX	\$X,XXX,XXX
<b>Grand Total</b>	<b>\$X,XXX,XXX</b>	<b>\$X,XXX,XXX</b>