





DISABILITY INCLUSION POLICY

Policy History

Version	Year/Approval	Remark
1.0	January 2025	First version

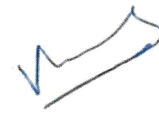


This Policy has been prepared by:

S/N	Name	Designation	Signature	Date
1.0	Igazeuma Okoroba, PhD	Head, Sustainability, DCP		4/01/25
2.0	Gloria Byamugisha	Group Chief Human Resources Officer, Human Resources		7/02/2025

This Policy has been reviewed by:

S/N	Name	Designation	Signature	Date
1.0	Edward Imoedemhe	General Counsel/Company Secretary		10-02-2025

This Policy has been approved by the Board:

S/N	Name	Designation	Signature	Date
1.0	Arvind Pathak	Group Managing Director/CEO		11.02.25
2.0	Emmanuel Ikazoboh	Chairman, Remuneration, Governance, and Nomination Committee		
3.0	Aliko Dangote, GCON	Chairman, Board of Directors		

S/No.	Description	Page
1.0	Introduction	4
2.0	Policy Statement	4-5
3.0	Scope	5
4.0	Purpose and Objectives	5
5.0	Definition	5
6.0	Disability Clusters	6
7.0	Guidelines	6
8.0	References	7-8
9.0	Our Policy - What we should not do	8
10.0	Roles and Responsibilities	8
11.0	Communication and Awareness	8
12.0	Reporting	9
13.0	Incident Reporting	9
14.0	Monitoring and Review	9-10
15.0	Conclusion	10
16.0	Policy Review	10

1. INTRODUCTION

Dangote Cement Plc, also referred to as 'DCP', is a leader in the African cement industry with a presence in Nigeria, South Africa, Senegal, Ghana, Cameroun, Ethiopia, Tanzania, Congo, Sierra Leone and Zambia, and with plans to expand across the African continent.

Driven by the goal of achieving the highest level of governance, Dangote Cement adopted the 7-pillar approach to embed and mainstream sustainability to its business operations and its corporate culture. DCP's institutional pillar supports its drive to build a world-class company based on strong governance, sustainable growth, transparency, dialogue and compliance with laws and regulations.

As a signatory to the United Nations Global Compact (UNGC), we are bound by its human rights principle and its non-discrimination stance for people of diverse ethnicities and backgrounds inclusive of people with disability.

Our overarching aim is to be considered a leading disability confident employer and a force for positive change in the global business community through fostering an environment where people with disabilities are included, feel empowered to be themselves and have access to the support and adjustments they need to thrive.

2. Policy Statement

DCP recognises the value of people of diverse abilities and is committed to the inclusion of people with disabilities in all aspects including employment, retention, training, and promotion. This policy is also binding on our supply chain partners including our vendors, contractors, and suppliers as well as other stakeholder groups that we interact and engage with including our investors, host community members etc.

DCP is committed to:

- a. **Legal Compliance:** Complying with all relevant legislation regarding access and equity for people with disabilities.
- b. **Statutory Compliance:** Complying with relevant statutory framework and requirements from governance bodies like WHO, ILO, UN Guiding Principles on Business and Human Rights etc. as regards disability inclusion.
- c. **Employee Inclusion and Integration:** Providing support for employees with disabilities to enable them to participate fully and independently in the organization in all aspects of their work and career development.
- d. **Stakeholder Inclusion:** Ensuring that the diverse categories of DCP stakeholders including supply chain partners, host community members, shareholders etc. are not discriminated against in their interactions with the organization on account of their disability.

- e. **Advocacy & Public Enlightenment:** Engage in advocacy and public enlightenment on all disability related matters within and outside the organization.

3. Scope

The disability inclusion policy applies to all employees of DCP in Nigeria and Pan-Africa, including directors, managers, contractors, business partners and suppliers. Our commitment to this policy will reflect in our daily operations, recruitment process and business dealings with our diverse stakeholders.

4. Purpose and Objective

The disability inclusion policy sets out our commitment to providing an environment where employees with disabilities are valued, supported, and encouraged, and can as far as practicably possible, participate fully and independently in their various roles in the organization.

- a. Ensure DCP is a disability inclusion employer through upholding the rights of persons with disability whether as employees or partners and discouraging discrimination of any form in terms of recruitment, retention, and promotion.
- b. Ensure DCP establishes and maintains structures (infrastructure or otherwise) to support employees with disability to perform to their optimum ability.
- c. Ensure the fostering of an organizational culture where employees with disabilities are fully accepted and integrated into the organization.
- d. Develop strategies and action plan to promote accessibility and disability inclusiveness at all levels of DCP's operations in Nigeria and Pan-Africa adopting relevant approaches.
- e. Ensure disability inclusion in dealings with all stakeholder groups including supply value chain, host communities and investors, etc.

5. Definition

- **Disability:** A physical, mental, cognitive, or developmental condition that impairs, interferes with, or limits a person's ability to engage in certain tasks or actions or participate in typical daily activities and interactions.
- **Inclusion:** Inclusion is an organizational effort or practice in which different groups or individuals having different backgrounds and physical/intellectual abilities are culturally and socially accepted, welcomed, or feel a sense of belonging.
- **Policy:** A governance document or instrument containing a course or principle of action adopted or proposed by an organization or individual.

6. Disability Clusters

DCP will identify with the following disability clusters:

- a. Albinism.
- b. Hearing Impaired/Deaf.
- c. Physical Disabilities.
- d. Visually Impaired/Blind.

7. Guidelines

- a. Ensure the accessibility of our physical and virtual environment for all employees with disabilities.
- b. Ensure our recruitment criteria do not create unnecessary barriers.
- c. Encourage disability disclosure where required among our staff while maintaining confidentiality.
- d. Work with disabled staff to determine support needs.
- e. Ensure the support to disabled staff remains relevant.
- f. Ensure our processes for career development takes cognizance of the needs of disabled staff.
- g. Support managers in responding to the needs of disabled staff.
- h. Assign roles that align with disability type.
- i. Ensure that staff who become disable while in active services gets commensurate compensation.
- j. Create awareness on all employees to desist from discriminating against their colleagues with disability and offer them the necessary support required to successfully navigate the work environment.
- k. Assign a quota for the recruitment of people with disability in our various recruitment platforms including graduate trainees, management trainees, etc.
- l. Adopt disability inclusion implementation strategies in compliance with the realities of the different operational locations.
- m. Ensure our business partners, contractors, and supply chain commit to complying with the principles in this policy in all their dealings.
- n. Provide and enhance disability friendly structures, inclusive of communication, an accessible workplace work culture and enhanced access to justice for PWDs. This includes ramps for wheelchair users, automatic entrance doors, lowered counters at reception areas, induction/hearing loops at reception areas and information in accessible formats e.g larger fonts/audio /braille.
- o. Set up a Disability Desk domiciled within the HR department responsible for handling all issues concerning people with disability.
- p. Ensure the policy applies during interactions and engagement with other stakeholder groups including host community, investors, distributors, customers etc.

8. References

Dangote Cement will continue to abide by relevant guidelines pertaining to disability inclusion in our operational locations. This policy is developed in compliance with the goals and targets of the following sustainability, legal and regulatory frameworks:

- a. Relevant legal Instruments in Nigeria and our operational locations pertaining to disability inclusion. Example: Discrimination against Persons with Disabilities (Prohibition) Act 2018 - Nigeria.
- b. **UNGC Principles 1, 2 & 6:**

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Principle 6: the elimination of discrimination in respect of employment and occupation.
- c. **SDG 10.2: Promote universal social, economic, and political inclusion.** By 2030, empower and promote the social, economic, and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- d. **The United Nations Convention on the Rights of Persons with Disabilities (2007):**

The purpose of this convention is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all people with disabilities, and to promote respect for their inherent dignity.
- e. **International Labour Organisation - The Rights of Persons with Disabilities**

The ILO has a longstanding commitment to promoting social justice and achieving decent work for people with disabilities. It takes a twin-track approach to disability inclusion. One track allows for disability-specific programmes or initiatives aimed at overcoming disadvantages or barriers, while the other track seeks to ensure the inclusion of disabled persons in mainstream services and activities, such as skills training, employment promotion, social protection schemes and poverty reduction strategies.
- f. **UN Universal Declaration on Human Rights - Declaration on the Rights of Disabled Persons (1975)**

Disabled persons have the right to economic and social security and to a decent level of living. They have the right, according to their capabilities, to secure and retain employment or to engage in a useful, productive, and remunerative occupation and to join trade unions.

9. Our Policy Prohibits:

- a. Discrimination against employees with disability with respect to employment, retention, training, promotion and statutory compensation and benefits.
- b. Discrimination against supply chain partners with disability with respect to contracting, bidding, onboarding, quality delivery of goods and services, payment and other relevant supply chain practices.
- c. Discrimination against people with disability under our diverse stakeholder groups including beneficiaries of our social investment thematic focus areas in health, education, economic empowerment and infrastructural development.
- d. Overt or covert engagement in unintentional disability discrimination evidenced in our organizational culture, structures and infrastructures.
- e. Association with any organization with a reputation for all forms of discriminatory practices including disability inclusion.

10. Roles and Responsibilities

The Board is saddled with the responsibility to provide overall direction for this policy and to monitor its performance and outcomes. The Board shall also ensure that this policy complies with applicable laws, principles, directives, and guidelines in all operational locations of Dangote Cement Plc.

The Group Managing Director through the Human Resources Department shall be responsible for the overall daily supervision of this policy to ensure that its implementation is per the guidance of the Dangote Cement Plc Board.

All Managers and Supervisors shall be responsible for getting acquainted with this policy and ensuring that all employees and other stakeholders have an adequate understanding and application of this policy.

All employees and stakeholders shall, in the performance of their respective duties to Dangote Cement Plc comply with this policy to the extent of the applicability of this policy to their tasks.

11. Communication and Awareness

- a. New employees must go through training on this policy.
- b. Existing employees will receive regular/periodic training and sensitization on changes to this policy
- c. Other stakeholders such as our customers, suppliers, consultants, contractors, agents, vendors etc. must be aware of our disability inclusion stance and commit to adherence in all their dealings and interactions with our organization.

- d. Disability inclusion awareness sessions will be held with employees and other relevant stakeholders, at least annually to further embed our inclusive culture among DCP staff.

12. Reporting

A platform will be made available for employees to report concerns about serious misconduct that contradicts DCP's commitment to the disability inclusion policy. Any breach of this policy will constitute gross misconduct and give rise to penalties up to suspension or total dismissal from DCP. Any employee or business partner found guilty will be subjected to the disciplinary measures in line with DCP disciplinary policy and procedures. Disciplinary actions will be in line with the recommendations of the disciplinary committee and the sanction grid.

DCP will protect employees who report what they reasonably believe to be any instance of discrimination against people with disability under the terms of this policy from retaliation or victimization.

13. Incident Reporting

All employees are obliged to send their suggestions to the Human and/or Sustainability Resources desk on possible lapses in operational processes and procedures that might give rise to discrimination against employees/identified stakeholders(s) living with disability.

14. Monitoring and Review

The Board shall be responsible for overseeing the implementation of this policy. The Sustainability, Human Resources and Legal Departments shall be responsible for monitoring the performance of this policy and providing continuous recommendations.

The policy should be reviewed periodically or as needed and approved by the Board. The Board shall also approve any exception to this policy.

15. Conclusion:

The disability inclusion policy is part of our diversity and inclusion drive for an inclusive workplace. All employees are mandated to comply strictly with the provision of this policy as non-compliance shall be viewed strongly and appropriate sanctions will be applied depending on the nature of the offence.

16. Policy Review

The Board shall review this policy at least once every three (3) years to ensure that it remains relevant and appropriate or as the need may arise. All changes and approvals shall be signed by the Board Chairman following deliberations and approval by the Board.
