

Policy Control

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Drafted by:	Tiana Vella and Anuschka von der Heyden
Designation	Director of Human Resources and Head of Sustainability
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Version Control

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VON DER HEYDEN GROUP

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6.2 DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES POLICY

1. Scope

At Von der Heyden Group (VDHG), we hold an unwavering commitment to fostering an inclusive culture that honours and celebrates diversity in all its forms. We firmly believe that all individuals should be treated equitably and with respect, and that everyone deserves a safe and welcoming environment.

We are committed to equal opportunities for all staff and applicants. It is our policy that all employment decisions are based on merit and the legitimate business needs of the organisation. To achieve this goal, we have implemented a comprehensive Diversity, Inclusion and Equal Opportunities Policy. This policy outlines our organization's stance against all forms of discrimination, provides clarity on prohibited behaviours, and clearly outlines the steps necessary for reporting and addressing incidents of discrimination.

This Policy is intended to help us achieve our diversity and anti-discrimination aims by clarifying the responsibilities and duties of all staff in respect of equal opportunities and discrimination. We will promote effective communication and consultation between management and staff concerning equal opportunities by means we consider appropriate.

The principles of non-discrimination and equal opportunities also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

We are committed to ensuring that our policies are consistently reviewed and updated to remain aligned with current laws and best practices. By prioritizing inclusivity and actively working to eradicate discrimination, we aim to cultivate a workplace environment that is not only respectful and supportive, but also inspires creativity, innovation, and growth for all.

This is a statement of policy only and does not form part of your contract of employment. This Policy may be amended at any time by VDHG, in its absolute discretion.

2. Statement

VDHG prohibits discrimination against individuals on the basis of their:

- Age
- Religion/belief
- Ethnicity/nationality
- Disability/medical history
- Marriage /civil partnership
- Pregnancy /maternity/paternity
- Gender identity/sexual orientation



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Our intention is to enable all our staff to work in an environment which allows them to fulfill their potential without fear of discrimination, harassment or victimisation. Our commitment to equal opportunities extends to all aspects of the working relationship including but not limited to:

- Hiring, promotion, and termination (including references)
- Terms of employment, including pay, conditions and benefits
- Training and development opportunities
- Work practices, conduct issues, allocation of tasks, discipline and grievances
- Performance evaluations
- Harassment, including sexual harassment
- Work-related social events
- Retaliation against individuals who report discrimination or participate in an investigation or proceeding related to discrimination

At VDHG, we believe in fostering an environment that is inclusive, welcoming, and supportive of all individuals, including staff, clients, subcontractors, and vendors. We recognize that discrimination can create a hostile and unpleasant workplace environment for our employees and negatively impact their wellbeing and productivity.

As such, we have a zero-tolerance policy when it comes to discrimination and will take appropriate action against any behaviour that violates our commitment to inclusivity and respect.

3. Who is Responsible for Equal Opportunities?

Achieving an equal opportunities workplace is a collective task shared between VDHG and all its staff. This Policy and the rules contained in it therefore apply to all staff of VDHG irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed-term staff and any volunteers or interns.

The board of directors has overall responsibility for this Policy and for equal opportunities and discrimination law compliance in the workplace and the Director of HR has been appointed as the person with day-to-day operational responsibility for these matters.

All staff have personal responsibility to ensure compliance with this Policy, to treat colleagues with dignity at all times and not to discriminate against or harass other members of staff, visitors, clients, customers, suppliers and former staff members, as well as speaking up when witnessing or experiencing discriminatory behaviour. In addition, staff who take part in management, recruitment, selection, promotion, training and other aspects of career development have special responsibility for leading by example and ensuring compliance.

Managers will receive appropriate training in equal opportunities and must take all necessary steps to:

- Promote the objective of equal opportunities and the values set out in this Policy;
- Ensure that their own behaviour and those of the staff they manage complies in full with this Policy;



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- Ensure that any complaints of discrimination, victimisation or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded.

4. In cases of discrimination

At our organization, we take allegations of discriminatory behaviour extremely seriously. We believe that all employees have the right to work in an environment that is free from discrimination, harassment, and retaliation, and we are committed to ensuring that this right is upheld.

If an employee feels that they are the victim of discriminatory behaviour or suspects that others are being discriminated against, we strongly encourage them to speak up and report the issue. This can be done by talking to their direct superior or the Director of HR.

Our HR Department is responsible for hearing all claims of discrimination and conducting a thorough investigation into the matter. We will take all necessary steps to protect the confidentiality of those involved and to ensure that the investigation is conducted in a fair and impartial manner.

If it is determined that discriminatory behaviour has occurred, we will take appropriate corrective action, which may include disciplinary action up to and including termination. We will also take steps to prevent further instances of discrimination from occurring in the future.

We understand that reporting discriminatory behaviour can be difficult, and we want to assure our employees that they will not face retaliation for speaking up. We are committed to creating a safe and supportive environment where all employees can come forward without fear of reprisal.

In addition to this Policy, we provide ongoing training and education for our employees to promote awareness and understanding of these issues. We believe that by working together, we can create a workplace culture that is respectful, inclusive, and supportive for all.

Staff should also note that:

- In some cases, they may be personally liable for their acts of discrimination and that legal action may be taken against them directly by the victim of any discrimination; and
- It may be a criminal offence intentionally to harass another employee.



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5. What is Discrimination?

Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any bias or unfair prejudice is prohibited by law, even if unintentional, unless a particular exception applies.

Direct Discrimination

Direct discrimination is less favourable treatment because of a bias or unfair prejudice. Examples would include refusing a woman a job as a chauffeur because you believe that women are not good drivers or restricting recruitment to persons under 40 because you want to have a young and dynamic workforce.

Direct discrimination can arise in some cases even though the person complaining is not subject to the bias or unfair prejudice but is perceived to be so or associates with other people who are. For example, when a person is less favourably treated because they are (wrongly) believed to be homosexual or because they have a spouse who is Muslim.

Indirect Discrimination

Indirect discrimination arises when an employer applies an apparently neutral provision, criterion or practice which in fact puts individuals with a disadvantage, statistically and this is unjustified. To show discrimination the individual complaining also has to be personally disadvantaged. An example would be a requirement for job candidates to have ten years' experience in a particular role, since this will be harder for young people to satisfy. This kind of discrimination is unlawful unless it is a proportionate means of achieving a legitimate aim.

Victimisation

Victimisation means treating a person less favourably because they have made a complaint of discrimination or have provided information in connection with a complaint or because they might do one of these things.

Harassment

Harassment is defined as unwanted conduct which has the effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Please refer to our Anti-Harassment and Anti-Bullying Policy for further details.

Disability Discrimination

This could be direct or indirect discrimination and is any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.



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6. Disabled Persons

Any staff member who considers that they may have a disability is strongly encouraged to speak with the Director of HR, particularly if they experience difficulties at work because of their disability so that any reasonable adjustments to help overcome or minimise difficulties can be discussed. For these purposes, disability includes any physical or mental impairment which substantially affects your ability to perform day to day activities and has lasted (or is likely to last) more than 12 months. Disclosure of this information will be treated in confidence, if you wish it to be, so far as is reasonably practicable and we will do our best to handle matters sensitively and to ensure that you are treated with dignity and with respect for your privacy.

We will consult with you about whether adjustments are needed to avoid you being disadvantaged and may ask you to see a doctor appointed by us, to advise on this. We will seek to accommodate your needs within reason. If we consider a particular adjustment unreasonable, we will explain why and try to find an alternative solution.

Managers with responsibility for managing a member of staff who they know or think to be disabled should speak to the Director of HR to ensure that all relevant duties are complied with.

7. Making Employment Decisions Fairly

As noted above, we will recruit employees and make other employment decisions concerning promotion, training, dismissal and related issues on the basis of objective criteria.

Managers should only stipulate criteria or conditions for employment decisions (including job selection, promotion and redundancy) which are based on a legitimate business need and which do not go further than is needed to satisfy that need. If you are in any doubt about whether particular criteria or conditions are indirectly discriminatory or justifiable, then please speak to the Director of HR.

Recruitment

Managers involved in recruitment must:

- Specify only recruitment criteria that are relevant to the job, reflect genuine business needs and are proportionate. More than one person should be involved in shortlisting of applicants wherever practicable.
- Ensure that vacancies are advertised to a diverse audience and try to avoid informal recruitment methods that exclude fair competition. In very rare cases, it may be legitimate and necessary to restrict recruitment to a particular role to certain groups,



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but it is essential that this is discussed with the Director of HR so that appropriate steps can be taken to ensure legality.

- Review job advertisements carefully to ensure that stereotyping is avoided and that particular groups are not unjustifiably discouraged from applying.
- Not ask applicants about health or disability before a job offer is made (other than in exceptional circumstances and after having been approved by the Director of HR). If necessary, a job offer can be expressed to be conditional upon satisfactorily passing a medical check.
- Not ask candidates about any topic if the question may demonstrate an intention to discriminate. For example, candidates should not be asked about current or future pregnancy, childcare or related matters.
- Not make assumptions about immigration status based on appearance, accent or apparent nationality.
- So far as reasonably practicable, keep a written record of their reasons for relevant decisions.

We are legally required to verify that all employees have the right to work in the country of employment. Prior to starting employment, all employees must produce original documents to our satisfaction, irrespective of nationality. Information about the documents required is available from the Director of HR.

Staff Training, Career Development and Promotion

Training needs may be identified during the normal appraisal process. Appropriate training to facilitate progression will be accessible to all staff.

All promotion decisions will be made on the basis of merit and according to proportionate criteria determined by legitimate business need.

Staff diversity at different levels of the organisation will be kept under review to ensure equality of opportunity. Where unjustified barriers to progression are identified, these will be removed.

Conditions of Service

Access to benefits and facilities and terms of employment will be kept under review to ensure that they are appropriately structured and that no unlawful barriers to qualification or access exist.

Discipline and Termination of Employment

Any redundancy selection criteria and procedures that are used, or other decisions taken to terminate employment, will be fair and not directly or indirectly discriminatory.



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Disciplinary procedures and penalties will be applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Discipline and Termination of Employment

Part-time and fixed-term staff will be treated the same as full-time or permanent staff of the same position and enjoy no less favourable terms and conditions (pro-rata, where appropriate), unless different treatment is justified.

8. Review of This Policy

The board of directors of VDHG will keep this Policy under review.

VDHG encourages staff to comment on this Policy and suggest ways in which it might be improved or ask any questions if they are unsure about any part of this Policy or how it is applied by contacting the Director of HR.