

The Company is committed to being an equal opportunities employer and truly valuing diversity. The working practices are free from unfair and unlawful discrimination and encourage mutual trust and respect of all individuals.

With employees based in both the UK and Romania, diversity is integral to our ongoing success. The Groups dynamic mix of people and ideas underpins our reputation for excellence in both products and service and is a key part of what makes *working with and for The Belfield Group a unique and enriching experience. The Group is committed and accountable for advancing diversity, equity and inclusion in all its forms and believes that diversity is a strength and is critical to maintaining excellence in all our endeavours.*

We seek to enable all staff and colleagues of the Group to achieve their full potential in an environment characterised by equality of opportunity in a respectful and inclusive environment. Further The Belfield Group seeks to fulfil its legal obligations and duties under the Equality Act 2010 within the UK and all relevant country or state-based alternatives globally, by ensuring that our policies, practices, processes, and culture reflect the principles laid down in this statement, for the purposes of clarity, the protected characteristics itemised within the UK Equality Act 2010 are as follows:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Sex/ Sexual orientation

## Definitions

### Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated favourably than others are, or would be, treated in the same or similar circumstances on the grounds of a protected characteristic, e.g. race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. Discrimination may be direct or indirect and includes discrimination by perception and association.

*Direct Discrimination* is when you are treated worse than another person or other people because:

- you have a protected characteristic
- someone thinks you have that protected characteristic (known as discrimination by perception)
- you are connected to someone with that protected characteristic (known as discrimination by association)

*Indirect Discrimination* happens when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic.

### Harassment

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

### Bullying

Although there is no legal definition of bullying, it can be described as unwanted behaviour from a person or group that is either: a) offensive, intimidating, malicious or insulting an abuse or b) misuse of power that undermines, humiliates, or causes physical or emotional harm to someone. Bullying and Harassment are often used interchangeably.

### Victimisation

# Diversity, Equity & Inclusion Policy

This occurs when a person is treated less favourably because they have brought or intend to bring proceedings under the Equality Act, or they have given or intend to give evidence supporting another.

## Commitments

The Belfield Group commits to a range of actions that combined bring the aims of the DE&I policy to life. Given the diverse nature of individual company operations, these are owned and actioned at a company level.

## Complaints

Complaints related to DE&I matters should be dealt with via your line manager, HR Department, or Grievance Procedure. Alternatively, the Safecall whistle-blowing call service is available.

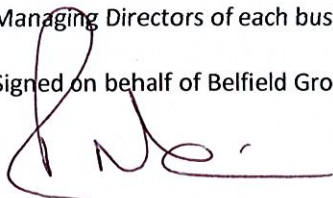
## Agreement, Monitoring and Review

Monitoring will also include assessing how the Diversity, Equity and Inclusion policy is working in practice, reviewing this annually, and considering and taking action to address any issues. This will be facilitated by means of an annual employee engagement survey. The DE&I policy is fully supported by senior management and has been developed and agreed by Group company representatives in consort.

The Belfield Group Board has overall responsibility for the implementation of this policy.

Managing Directors of each business are responsible for establishing DE&I within their operations.

Signed on behalf of Belfield Group



Rachael Nevins  
Chief Executive Officer