

Diversity, Equity & Inclusion Policy

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 Group's 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 and Sexual orientation

Definitions

Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated less 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 less favourably than another person or other people because:

- you have a protected characteristic
- you are thought to have a protected characteristic when you do not (known as discrimination by perception)
- you have a connection with someone with a protected characteristic (known as discrimination by association)

Indirect Discrimination can be less obvious than Direct Discrimination and it may not always be someone's intention to discriminate. Indirect discrimination is when a working practice, policy or rule is the same for everyone in a group and:

- it would put people who share a protected characteristic at a disadvantage
- it puts someone personally at a disadvantage
- the employer cannot justify the course of action

Harassment

Under the Equality Act 2010, there are 3 types of harassment:

- harassment related to certain protected characteristics
- sexual harassment
- less favourable treatment as a result of harassment

To be harassment, the unwanted behaviour must have either violated the person's dignity or created an intimidating, hostile, degrading, humiliating or offensive environment for the person.

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Bullying

Although there is no legal definition of bullying, it is usually defined as behaviour from a person or group that is either offensive, intimidating, malicious or insulting, or is an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

Bullying and Harassment are often confused and by law, bullying behaviour can be harassment if it relates to any of the protected characteristics.

Victimisation

This occurs when a person is treated less favourably as a result of being involved with a discrimination or harassment complaint under the Equality Act, or they have given or intend to give evidence supporting another person's complaint.

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.

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

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

Signed on behalf of Belfield Group



Tom Prestwich
Group Managing Director