



EQUALITY, DIVERSITY, INCLUSION AND DIGNITY AT WORK POLICY



July 2024

At AB Agri, we are committed to promoting equal opportunities, valuing diversity and supporting an inclusive working environment free of harassment and bullying and for all our colleagues to be treated with dignity and respect.

We operate in increasingly diverse environments globally and this is evident in our workforce, clients, customers, suppliers, communities and partners. At AB Agri we welcome diversity, and fully appreciate that everyone has something unique to offer. We respect and understand these differences and aim to make the most of everyone's talents.

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We need your support to meet our commitment of ensuring equality, diversity, inclusion and dignity are present at work and to avoid discrimination.

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It is important to adhere to the spirit of the policy as you could be held personally liable as well as, or instead of, AB Agri for any act of unlawful discrimination.

We consider acts of discrimination, bullying and harassment against those we employ, or our customers, as disciplinary offences that may be dealt with under the disciplinary procedure.



OUR AIMS

1

Fully supported equality, diversity and inclusion in the workplace.

2

Fair treatment in every aspect of working life at AB Agri. Applicable to all employment policies and practices including:

Recruitment, selection and retention;

Employment terms and conditions;

Working environment;

Learning and development;

Promotion and career progression;

Redundancy and re-deployment.

3

Promotion of a culture where employees recognise the value that a diverse and inclusive workforce brings.

4

Be recognised as an employer with a positive reputation for equality, diversity and inclusion practices.

EQUALITY, DIVERSITY AND INCLUSION (ED&I)

At AB Agri, equality, diversity and inclusion are important principles. Our aim is to be an organisation where people feel involved, respected and connected to our success.



To us, diversity is understanding, recognising and valuing differences both visible (e.g. race, gender, age) and non-visible (e.g. religious beliefs, values, preferences). It means we recognise that everyone is unique.



Likewise, equality means that we remove barriers, eliminate discrimination and ensure equal opportunities and access for all groups of people working for AB Agri.



Inclusion means we attract and develop talent wherever it exists and encourage everyone to achieve full potential. We aim for a culture where differences are not just accepted but valued with opportunity to develop.



ED&I is championed by the CEO and Board. A Steering Committee including senior leaders and operators across AB Agri provide direction for ED&I programmes, promote an inclusive culture and facilitate best practice sharing.



'We aim to create an environment that does not discriminate against both visible and non-visible characteristics.'

Discrimination

Employees, contractors, or any other persons associated with AB Agri, must not discriminate against other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in and outside the workplace and on work-related trips or events including social events.

In most countries, including the UK, it is against the law to discriminate against protected characteristics, click the boxes on the next page to find out more about each characteristic.

In line with legislation, those perceived as having one of these characteristics are also protected. We will also not discriminate because of working patterns or trade union membership nor will we tolerate harassment or bullying on these or any other grounds.

There are different types of discrimination which you can read about in the next section. All of these are unlawful and will not be tolerated at AB Agri.

Types of discrimination

Discrimination arising from disability - occurs when someone is treated unfavourably because of something connected with their disability and cannot justify such treatment.

Association Discrimination - occurs when you treat another person less favourably because of their association with another person who has a characteristic (other than pregnancy and maternity).

Perceptive Discrimination - occurs when you treat another person less favourably because you mistakenly think they have a characteristic.

Discrimination because of pregnancy and maternity - it is discriminatory to treat a woman less favourably because she is or has been pregnant, has given birth in the last 26 weeks or is breastfeeding a baby who is 26 weeks or younger. It is direct sex discrimination to treat a woman less favourably because she is breastfeeding a child who is more than 26 weeks old.

Direct discrimination - occurs when someone is treated less favourably than another person because of a characteristic. e.g. someone is not offered a promotion because they're a woman and the job goes to a less qualified man.

Indirect discrimination - occurs when a policy, rule or procedure applies to everyone but has a disproportionate impact on people with a characteristic. E.g. a job advert stating applicant must have 10 years experience could be indirect discrimination based on age as younger people may still have the qualifications and skills needed but could not have that length of experience.

PROTECTED CHARACTERISTICS

(As defined in UK legislation by the Equality Act 2010)

Age

Refers to a person of a particular age (e.g. 32 years old) or belonging to a range of ages (e.g. 18-30 year olds).

Disability

Legal Definition: A person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Our definition: A disability is any condition that makes it more difficult for a person to do certain activities or interact with the world around them. These conditions, or impairments, may be cognitive, developmental, intellectual, mental, physical, sensory or a combination of multiple factors. Impairments causing disability may be present from birth or occur during a person's lifetime.

Gender reassignment

The process of transitioning from one gender to another.

Case Law has confirmed that people who are non binary or gender fluid are protected by the Act.

Marriage and civil partnership

Marriage refers to a union between a man and a woman or a same-sex couple. Both mixed sex and same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted under law).

Pregnancy and maternity

Pregnancy is the condition of expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context.

Race

Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.



Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex

Male, Female, transsexual, transgender or non-binary.

Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to all sexes.

BULLYING & HARASSMENT

Bullying and harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010.

Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying and harassment may be misconduct that is physical, verbal or non-verbal, e.g. by letter or email.

Examples covered under this policy:

- physical conduct from unwelcome touching to serious assault;
- unwelcome sexual advances;
- offer of rewards for going along with sexual advances, e.g. promotion, access to training;
- threats for rejecting sexual advances, e.g. suggestions that refusing advances will adversely affect the employee's employment, evaluation, pay, advancement, assigned work, or any other condition of employment or career development;
- demeaning comments about a person's appearance;

- unwelcome jokes or comments of a sexual or racial nature or about an individual's age, disability, sexual orientation or religion;
- questions about a person's sex life;
- unwanted nicknames related to a person's age, race or disability;
- use of obscene gestures;
- excluding an individual because they are associated or connected with someone with a protected characteristic, e.g. their child is gay, spouse is black or parent is disabled;
- ignoring an individual because they are perceived to have a protected characteristic when they do not, in fact, have the protected characteristic), e.g. an employee is thought to be Jewish, or is perceived to be a transsexual;
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person, e.g. magazines, calendars or pin-ups;
- spreading malicious rumours or insulting someone;
- picking on someone or setting them up to fail;
- making threats or comments about someone's job security without good reason;
- ridiculing someone;
- isolation or non-cooperation at work; and
- excluding someone from social activities.

Conduct may be harassment whether or not the person behaving in that way intends to offend and something intended as a joke may offend.

People find different things acceptable and everyone has the right to decide what is acceptable to them and have their feelings respected by others.

Read on for different types of harassment and examples of each.

Harassment based on a perception - When a person engages in unwanted conduct towards another because they perceive the recipient has a protected characteristic, when the recipient does not in fact.

For example, it would be harassment for an individual to tease repeatedly an individual because of an incorrect belief that the recipient is deaf.

Similarly, a male employee may look much older than his age. If the organisation does not allow him to make presentations to clients because his line manager thinks that he is too old, the employee has been discriminated against because of a perception of the protected characteristic of age, even though he may be relatively young.

Similarly, if an employee is called names and made fun of because his colleagues believe that he is a transsexual, he may have a claim for perceptive harassment related to the protected characteristic of gender reassignment, even though he is not a transsexual.

Harassment based on association - Discrimination against or harassment for association with an individual who has a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

For example, if an employer denies an employee a promotion because she is taking care of a disabled relative and the employer thinks that the employee will not have any time for new duties, this could amount to associative discrimination as disability is one of the specified protected characteristics.

Similarly, if an employer harasses an employee because his brother is gay, this would be unlawful as associative harassment as sexual orientation is another of the protected characteristics.

Third party harassment - When an individual is subjected to unwanted conduct from a third party, such as a client, customer, supplier, visitor or vendor.

For example, a client making a series of racist remarks. You should report such behaviour to your manager who will take appropriate action.

The impact of bullying and harassment

Bullying and harassment can affect people physically, emotionally, and psychologically. People may experience a great deal of distress as a result of their perpetrator's behavior, which can manifest itself in frustration, anger, anxiety, insomnia, inability to concentrate, performance and productivity issues, and other physical and emotional symptoms. The treatment they experience also tends to influence their lives outside of work.

Often, people might not recognise that they are being bullied. Some may feel a vague discomfort at work towards their perpetrator that they cannot recognize. Others may feel that they are on an emotional rollercoaster with the person. Some may sense that they are experiencing toxic, unfair, or disrespectful treatment at times, but can't understand why. The individual may dread or fear seeing the individual, not enjoy tasks or activities they liked before, and can even become physically ill from the stress of these actions.

We have support including our Employee Assistance Programme, and information on improving your wellbeing. Visit <https://abfoods.sharepoint.com/sites/abg-people/SitePages/Your-Wellbeing.aspx> for more information, or speak to your line manager or People & Performance representative.



A few members of the People & Performance Leadership Team came together to produce a short video to share their personal experiences, along with tips and information on what to do should you experience bullying and/or harassment in the workplace.

The video covers:

- The effects of bullying and harassment
- What it really means and how it's covered in our policies
- The speakers' personal experiences
- Common misunderstandings
- What to do if you need help or support

You can view the video at: <https://vimeo.com/645310544/2600be0de7>

What is victimisation?

Subjecting a person to detriment because they have, in good faith, complained that someone has been bullying or harassing them or someone else, or supported or given evidence in relation to a complaint. This includes isolating someone or giving a heavier or more difficult workload.

Provided you act in good faith, i.e. you genuinely believe what you are saying is true, you have a right not to be victimised for making or doing anything in relation to a complaint of bullying or harassment and we will take appropriate action to deal with any alleged victimisation, which may include disciplinary action. Making a complaint or giving evidence you know to be untrue, may lead to disciplinary action being taken against you.

Complaints of bullying and harassment are treated sensitively and as confidentially as possible. Investigation of allegations may require disclosure on a 'need to know' basis e.g. your identity and the nature of the allegations revealed to the complainee to respond to allegations. Details may also be given to witnesses and confidentiality is emphasised. If the complaint is upheld, and the complainee found to have harassed you is kept in employment, managers may be given information to manage risk of further harassment against you or others.



RECRUITMENT AND SELECTION

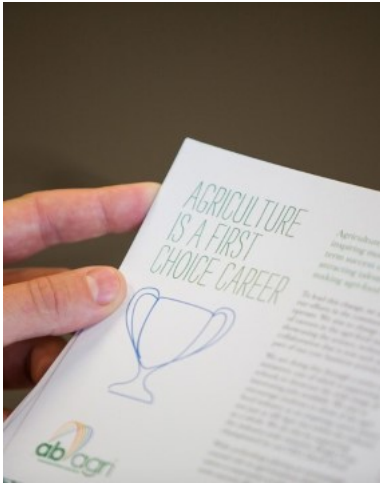
Recruitment, promotions and other selection exercises e.g. redundancy are based on merit against objective criteria avoiding discrimination.

Vacancies are generally advertised to a diverse section of the labour market. Advertisements must avoid stereotyping or wording that may discourage particular groups to apply. Where possible, shortlisting is undertaken by more than one person.

Job applicants particularly should not be asked questions that might suggest an intention to discriminate on grounds of a characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about their health or disability before a job offer is made; except in the very limited circumstances allowed by law.

Part-time and fixed-term employees will be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is objectively justified.



For example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

Recruitment Agencies on the Preferred Suppliers List (PSL) at AB Agri are bound by specific agreed terms in order to work with us and they will be measured against them on an ongoing basis. Failure to comply with these terms will result in a termination of their contract.

What should I do if I think I am being bullied, harassed or discriminated against?

You may be able to sort matters informally. The person may not know their behaviour is unwelcome or upsetting so an informal discussion may help them understand the effects of their behaviour and agree to change it. You may feel able to approach the person yourself, with the help of a manager, People & Performance, trade union representative or another employee or an initial approach could be made on your behalf by one of these people. You should tell the person what behaviour you find offensive and you would like it to stop immediately. You may want to add that if it continues, you intend to make a formal complaint. Keep a note of the date and what was said and done, this will be useful evidence if you make a formal complaint.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint using the grievance procedure. In cases about bullying, harassment or discrimination the normal grievance procedure is modified so you can choose whether to raise your grievance with your manager or directly with People & Performance. We will ensure that you can bring your complaint in the first instance to someone of your own sex, if you so choose.

In very serious cases, a criminal offence may have been committed and you may wish to report matters to the police. People & Performance can arrange for someone to accompany you to the police. All complaints will be investigated promptly and if appropriate, disciplinary proceedings carried out. You will be kept informed of the general progress of the process of investigation and the outcome of any disciplinary proceedings. We will decide on a balance of probabilities, after considering all available evidence, whether or not harassment, bullying or discrimination has occurred.

What happens if I am accused of bullying, harassment or discrimination?

If someone approaches you informally about your behaviour, do not dismiss the complaint because you were only joking or think they are being sensitive. People find different things acceptable and everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. You may have offended someone without intending to. If that is the case, the person may be content with an explanation, apology and an assurance that you will be careful in future not to behave in a way that you now know may cause offence. Provided you do not repeat the behaviour that may well be the end of the matter.

If a formal complaint is made about your behaviour, this will be fully investigated and may bring disciplinary proceedings, if appropriate.

Some types of bullying or harassment may constitute unlawful discrimination and civil claims or criminal proceedings could be brought against you, independently to disciplinary proceedings. In the case of a successful claim in the employment tribunal or other courts you could be personally liable to pay compensation to the complainant or receive conviction and criminal penalties.

Formal complaint procedure

We will follow the disciplinary procedure which will be implemented at the appropriate stage for the seriousness of the allegation. Bullying, harassment and discrimination are often be considered to be allegations of gross misconduct which, if proved, if proved, could lead to dismissal without notice.

We treat complaints of bullying, harassment and discrimination sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations and future management of risk, if complaints are upheld, will normally require limited disclosure on a "need to know" basis. For example, some details may have to be given to potential witnesses but the importance of confidentiality will be emphasised to them.

Wherever possible, the organisation will try to ensure that you and the complainant are not required to work together while the complaint is under investigation. If the allegation is of gross misconduct, you may be suspended on full pay during the investigation and, if a disciplinary hearing is to be called, until disciplinary proceedings have been concluded.

If the complaint against you is upheld, on a balance of probabilities, a disciplinary penalty may be imposed up to and including dismissal, having regard to the seriousness of the offence and all relevant circumstances. If the complaint is upheld, but you are not dismissed, we could decide to transfer you to another role.

If a complaint is made against you that is not upheld and we have grounds for believing that the complaint was not made in good faith, we will take disciplinary action against the person making the false complaint.

You must not victimise a person who has made a complaint in good faith against you or anyone who has supported them in making the complaint or given evidence in relation to such a complaint. Disciplinary action will be taken against you if there is good reason to think that you may have victimised the complainant or someone else.

If the complaint against you is not upheld, People & Performance will support you, the complainant and your manager(s) in making arrangements for you both to continue or resume working and to help repair working relationships. We will consider making arrangements to avoid you and the complainant having to continue to work alongside each other, if required.

Responsibilities

We all have a responsibility to help create and maintain a work environment free of bullying and harassment. You can help by:

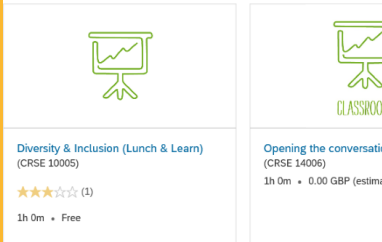
- being aware of how your behaviour may affect others and changing it, if necessary - you can still cause offence even if you are "only joking";
- treating colleagues with dignity and respect;
- making it clear to others when you find their behaviour unacceptable;
- intervening, if possible, to stop harassment or bullying and supporting recipients;
- reporting harassment or bullying to your manager or People & Performance and supporting in the investigation of complaints; and
- if a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

Managers have a particular responsibility to:

- set a good example by their own behaviour;
- ensure that there is a supportive working environment;
- make sure that staff know what standards of behaviour are expected of them;
- intervene to stop bullying or harassment; and
- report promptly to People & Performance any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.



If you are disabled or become disabled, we encourage you to tell your line manager or People & Performance about your condition so we can consider what reasonable adjustments or support is appropriate to enable you to perform your role fully.



Training is provided to understand your rights and responsibilities under this policy and how you can help create an environment free of bullying and harassment. There is further training for managers to deal with bullying and harassment complaints and diversity and inclusion in decision making.



See the Whistleblowing Policy for instances of discrimination you become aware of and the Grievance Policy to raise a complaint yourself.

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