



## **Diversity, Equity and Inclusion Policy**

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This document articulates operational and performance guidance for Yellow Cake plc employees, officers, contractors, consultants, volunteers, interns, casual workers and agency workers.



## **1. EQUAL OPPORTUNITIES STATEMENT**

Yellow Cake plc (the “**Company**” or “**we**”) is committed to promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. The Company complies with all relevant discrimination laws. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

## **2. ABOUT THIS POLICY**

- 2.1 This policy sets out our approach to diversity, equity and inclusion and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 2.2 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **3. WHO IS RESPONSIBLE FOR THIS POLICY?**

- 3.1 Our board of directors (the Board) has overall responsibility for the effective operation of this policy, its periodic review and for ensuring compliance with relevant discrimination laws. Day-to-day operational responsibility for this policy, including regular review of this policy, has been delegated to the Chief Executive Officer.
- 3.2 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.
- 3.3 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Chief Executive Officer or Chief Financial Officer. If you have any questions about the content or application of this policy, you should contact the Chief Executive Officer or Chief Financial Officer.

## **4. DISCRIMINATION**

- 4.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the



workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts and on work-related trips or events including social events.

4.2 The following forms of discrimination are prohibited under this policy and are unlawful:

- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.
- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- (e) **Disability discrimination:** this includes direct and indirect discrimination, 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.

## 5. BREACHES OF THIS POLICY

- 5.1 We take a strict approach to breaches of this policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 5.2 Complaints will be treated in confidence and investigated as appropriate.
- 5.3 There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct.

## 6. RECRUITMENT AND SELECTION

- 6.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination.
- 6.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.



- 6.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 6.4 Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of executive management. For example:
- (a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
  - (b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
  - (c) Positive action to recruit disabled persons.
  - (d) Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

- 6.5 We are generally required by law to ensure that all employees are entitled to work in the jurisdiction where they are appointed to work. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

## **7. TERMINATION OF EMPLOYMENT**

- 7.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 7.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## **8. DISABILITIES**

- 8.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- 8.2 If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.



8.3 We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

**9. PART-TIME AND FIXED-TERM WORK**

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