

MODULAIRE GROUP POLICY

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# EQUALITY, DIVERSITY & INCLUSION

A MESSAGE FROM THE CEO

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WHAT DOES THIS  
POLICY COVER

A handwritten signature in white ink that reads "Mark".

**MARK HIGSON**  
GROUP CEO

## A MESSAGE FROM THE CEO

At Modulaire Group we respect and value differences and are passionate about our people, our customers and the planet. We nurture an environment where all differences are valued, practices are equitable and everyone experiences a sense of belonging. We are committed to building a culture that brings together the very best of our people and their unique skills, experiences, abilities and where they can flourish.

I strongly believe that our diverse workforce is central to our business success. In joining the Modulaire Group, you will be able to apply and develop your skills and knowledge as part of a collaborative team that is helping to innovate and play a part in building a better future and creating value for our customers, our people, society and the planet.

Equality, diversity and inclusion (ED&I) are an essential part of our people agenda, and it absolutely has our focus within the Modulaire Group. The content of our policy clearly underlines the importance of ED&I and eliminating unlawful discrimination. We would like to offer a workplace to our employees where everybody can be themselves, and where all employees are valued.

This policy applies to all employees (whether fixed term, permanent or temporary), directors, officers and other individuals working for Modulaire Group, such as contractors and agency workers.

It's unlikely that this policy will conflict with local laws or regulations, but if it does the local law or regulation must always be followed.

We are committed to ensuring that everyone is treated with dignity, respect and equality.

Discrimination in any form will not be tolerated.

WHO IS COVERED  
BY THIS POLICY

- 1.1 Modulaire Group is committed to encouraging equality, diversity and inclusion (EDI) and eliminating unlawful discrimination. We recognise that promoting a culture of inclusion is vital to our success.

We aim to reflect the diversity of the regional, national, and international communities where we do business and provide our products and services. We aim to create a workplace environment where people can be free to be themselves no matter what their identity or background.

We will ensure that each employee is respected and valued so that everyone can reach their fullest potential. We extend this commitment to our customers, suppliers, stakeholders and members of our communities where we operate.

- 2.1 This policy sets out our approach to EDI and the avoidance of discrimination at work.
- 2.2 The policy's purpose is to:
  - (a) promote and require equality, fairness and respect for all employees, whether temporary, part-time or full-time and also to others working with our organisation such as agency staff or contractors.
  - (b) require equal treatment regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation or other characteristics protected by local laws (**Protected Characteristics**).
  - (c) oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.
- 2.3 This policy underpins our commitment to the UN Global Compact Principles (Human Rights, Labour, Environment and Anti-Corruption), the UN Sustainable Development Goals (in particular SDG 5 on Gender Equality) and any applicable local legislation.

- 2.4 The Chief Human Resources Officer is responsible for this policy, ensuring its implementation and the provision of any necessary training on EDI. HR Teams in our Strategic Business Units have responsibility for co-ordination, support and delivery of this work and ensuring that all HR policies and procedures are consistent with this EDI Policy.
- 2.5 The Board and Executive Committee are fully supportive of this policy and it has been agreed with trade unions and/or employee representatives in jurisdictions where that is necessary.
- 2.6 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 2.7 This policy is intended to be an overarching policy, which applies wherever we do business. However, if any provisions of the policy conflict with local law requirements in countries where we operate those local laws will prevail.

- 3.1 We are committed to having a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all are recognised and valued.
- 3.2 Our employees 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.
- 3.3 The following behaviours are prohibited under this policy and are likely 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. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men do. Such a requirement would be discriminatory unless it can be 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.
  - (i) *Sexual Harassment: any unwelcome sexual behaviour (physical, spoken or written) which could reasonably be expected to make a person feel offended, humiliated, or intimidated*
  - (ii) *Psychological Harassment: any hostile, humiliating or abusive behaviour that manifests itself in the form of unwanted conduct, verbal comments, actions or gestures*
  - (ii) *Bullying: any repeated, malicious or severe oral, written or physical mistreatment that a reasonable person would consider offensive, degrading or humiliating to one or more individual(s) in the Workplace*
- (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.

- (f) **Workplace Violence:** any incident in which a person is abused, threatened or assaulted in circumstances relating to their work. This can include verbal abuse or threats as well as physical attacks.

- 4.1 Recruitment, promotion and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.
- 4.2 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. They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.
- 4.3 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.
- 4.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law.
- 4.5 We will make opportunities for training, development and progress available based on merit, encouraging individuals to develop their full potential, so that their talents can be fully utilised in the success of the organisation.

SECTION FOUR

RECRUITMENT,  
SELECTION &  
DEVELOPMENT

- 5.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

- 6.1 We are committed to training managers and all other employees about their rights and responsibilities under this Equality, Diversity and Inclusion policy.
- 6.2 We will monitor the make-up of our people regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.
- 6.3 We will assess how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

SECTION SIX

COMMITMENT TO  
TRAINING &  
MONITORING

- 7.1 We take a strict approach to breaches of this policy, such acts will be dealt with as misconduct under our grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- 7.2 If you experience or witness any breaches of this policy, please report them to your line manager, a member of your local HR team or other management. Any reports will be recorded in line with local reporting processes.
- 7.3 If you feel the need to raise the issue outside of your immediate working environment, you should promptly report the issue to your Ethics and Compliance Advisor or anonymously via the Modulaire Global Helpline:

<http://modulairegroup.ethicspoint.com>

Complaints will be treated in confidence and promptly investigated as appropriate.

- 7.4 Under no circumstances will any employee who makes a report in good faith be subject to any acts of retribution, retaliation, or disciplinary action. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our disciplinary procedures