

# Valeo Foods Group - Diversity Equality & Inclusion Policy

## Introduction

Valeo Foods Group (and its subsidiaries) is committed to promoting equality, fairness and diversity among Valeo Foods Group. We aim to create an inclusive culture, that gives everyone the freedom to succeed, irrespective of their gender identity or expression, race including ethnic origins, nationality and colour, religion, disability, marital status, pregnancy and maternity, age or sexual orientation.

As a Group we are committed to maintaining a diverse and inclusive workforce at all levels. The Board of Directors of Valeo Foods recognises and places great emphasis on the principle and benefits of diversity. The Board is committed to ensuring that its composition is diverse and balanced.

Valeo Foods Group will not unlawfully discriminate and will oppose and avoid all forms of unlawful discrimination, complying with all applicable laws and regulations. Discrimination, bullying or harassment will not be tolerated.

## Scope and Governance

In accordance with this commitment, Valeo Foods Group has adopted this DE&I Policy, which is applicable to all Valeo Foods Group Personnel globally, agents, representatives and other associated persons such as contract/ subcontract and third-party employees of Valeo Foods Group including all subsidiaries, associates, joint ventures and affiliated companies (collectively, the “Valeo Foods Group” or the “Group”).

This Policy and the internal controls herein have been designed to ensure diversity, equality & inclusion is promoted throughout the business, and this enables Valeo Foods Group to respond promptly and effectively to any inquiries about its conduct.

This policy has been approved by Valeo Foods Group’s executive management and approved by the Board of Directors. Any internal concerns or questions should be raised at a local level, in accordance with the relevant business procedure.

In addition, the policy is reviewed and monitored based on progress in strategic objectives and ongoing DE&I priorities. The GCPO (Group Chief People Officer) has responsibility for the supervision and implementation of this policy. This policy is reviewed bi-annually and if any amendments are needed this will be actioned to comply fully with DE&I reporting and governance requirements in the jurisdictions in which we operate.

## Our Commitment

Valeo Foods Group has a zero tolerance towards any form of discrimination and will take immediate action and disciplinary measures in the event of any alleged breach. Discrimination can be defined as;

- Direct discrimination where a person is less favourably treated because of a protected characteristic.
- Indirect discrimination where a provision, criterion or practice which cannot be justified is applied equally to all groups but has a disproportionately adverse effect on one particular group.
- Harassment, where on the grounds of a protected characteristic, someone engages in unwanted conduct which has the purpose or effect of violating a person's dignity or creating an intimidating or hostile working environment.
- Victimisation, where someone is treated less favourably than others because he/she/they have taken action against the company or an employee of the company under one of the relevant protected characteristics.

## Monitoring

Our Group is committed and focused on proactive measures to prevent discrimination and harassment rather than solely relying on reactive responses to complaints. We regularly monitor and evaluate the effectiveness of our actions and make adjustments as needed. We seek feedback from employees through surveys, focus groups, and other channels to understand their experiences and identify areas for improvement.

The DE&I activity will be monitored on an ongoing basis through KPIs in the workforce regarding information such as age, gender and disability (to the extent that data and privacy laws allow) solely to take positive affirmative action in support of our DE&I objectives.

## Specific Policy Points

### Recruitment

Valeo foods Group expects all steps will be taken at a Group level and at a local divisional level to ensure that applications are attracted from candidates without regard to a protected characteristic and will ensure that there are equal opportunities in all stages of the recruitment process.

Job requirements and job selection criteria should be clear and based only what is required to get the job done effectively. Stereotypical assumptions based on protected characteristics about who is able to do a particular job will be avoided. We aim so ensure that no applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups, and which are not justified by the demands of the job.

All recruitment conducted will follow local business relevant procedural requirements.

**Promotion**

Promotion is made without regard of any protected characteristics and will be made on the basis of merit. There will be no unlawful discrimination against any personnel in making promotion or training decisions; all employees have an equal opportunity to progress and to develop.

**Internal Reporting**

This Policy is supported by appropriate divisional harassment, disciplinary and grievance procedures which are recorded and conducted in a confidential manner.

Any Group personnel who have knowledge of, or reason to suspect, any violation of this Policy should follow local business reporting procedure or contact the Group Chief People Officer.

Alternatively, the independent whistle blowing helpline can be called to maintain anonymity if it is not appropriate to report the matter internally. The whistle-blowing helpline is private and confidential and can be reached at any time of the day or night via [www.safecall.co.uk](http://www.safecall.co.uk), via which local contact details and local language reporting options are available.

Breaches of this policy may result in disciplinary action and will be treated as gross misconduct.

**Compliance Procedures and Training**

Valeo Foods Group takes its commitment to Diversity, Equality and Inclusion compliance very seriously and operates a zero-tolerance approach. Any Group personnel who have knowledge of, or reason to suspect, any violation of this Policy should follow local business reporting procedure or contact the Group Chief People Officer.

All personnel are responsible for adherence to this Policy and should be aware of their personal responsibility to each other, customers, contractors, suppliers and visitors.

As part of Valeo Foods Group's ongoing commitment all Valeo Foods Group Personnel must receive, understand and confirm their agreed compliance.

Valeo Foods Group will offer periodic DE&I training programs to educate all personnel about the requirements and obligations of discrimination laws and this Policy. All Valeo Foods Group Personnel of the Group must participate in such training and the local records must be kept as evidence establishing compliance with this requirement.

Any questions regarding this Policy can be addressed to the local divisional HR Lead or the Group Chief People Officer.

*Last Updated: June 2024*

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Group CEO

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Group CPO