

## EQUAL OPPORTUNITIES, DIVERSITY & INCLUSION POLICY

### 1. Policy Statement

Riello UPS is committed to providing **equal opportunity, promoting diversity, and fostering an inclusive work environment**, while eliminating unlawful discrimination in all aspects of employment.

We are committed to creating and maintaining a workplace where all individuals feel **valued, respected and included**, are treated **fairly**, with **dignity and respect**, and where differences are recognised as a strength that supports business success, innovation and sustainability.

Riello UPS is also committed to ensuring **fair, transparent and equitable pay and reward practices**. The Company will not discriminate in relation to pay, benefits, bonuses, allowances or any other form of remuneration and is committed to the principle of **equal pay for equal work**, including work of equal value.

This policy applies to all stages of employment, including recruitment, selection, promotion, training, development, remuneration, performance management, discipline and termination of employment. This policy should be read in conjunction with the Company's:

- **Dignity & Respect Policy**
- **Code of Conduct & Behaviour Policy**
- **Grievance Policy & Procedure**
- **Disciplinary Policy & Procedure**
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Together, these policies set out expected standards of behaviour and the procedures for raising and resolving concerns relating to discrimination, bullying, harassment or exclusion.

This policy does not form part of the employee's contract of employment.

### 2. Our Company Values, Diversity and Inclusion

Our commitment to equality, diversity and inclusion is underpinned by Riello UPS's four core values:

#### **Energy and Engagement**

We actively promote inclusion, embrace difference and value diverse perspectives to create an engaged, respectful and supportive workplace.

#### **Think Customer**

By building inclusive and diverse teams, we enhance our understanding of customers and deliver better, more responsive service.

#### **Winning Team**

We foster strong team ethics through integrity, mutual respect, encouragement and recognition, ensuring everyone feels included and able to contribute fully.

#### **Drive for Results**

We focus on results through objective, fair and evidence-based decisions, including in recruitment, reward, development and progression.

All employees and managers are expected to demonstrate these values and actively support inclusion in their behaviour and decision-making.

### **3. Legal Framework**

This policy operates in accordance with applicable equality and employment legislation.

#### **United Kingdom**

- Equality Act 2010
- Employment Rights Act 1996
- ACAS Codes of Practice

#### **Ireland**

- Employment Equality Acts 1998–2015
- Industrial Relations Acts
- Workplace Relations Commission (WRC) Codes of Practice

The Company will comply with all relevant statutory obligations in both jurisdictions.

### **4. Scope of the Policy**

This policy applies to:

- all employees and job applicants;
- workers, contractors, agency staff and consultants, where applicable;
- all employment-related decisions, practices and processes.

### **5. Protected Characteristics**

The Company will not discriminate on the grounds of any protected characteristic, including (but not limited to):

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, ethnic or national origin)
- religion or belief
- sex
- sexual orientation

### **6. Forms of Discrimination**

### 6.1 Direct Discrimination

Treating a person less favourably because of a protected characteristic.

### 6.2 Indirect Discrimination

Applying a provision, criterion or practice that places individuals with a protected characteristic at a disadvantage and which cannot be objectively justified.

### 6.3 Harassment

Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

### 6.4 Victimisation

Treating a person unfavourably because they have raised a complaint, supported a complaint, or participated in an investigation under this policy.

Further guidance, examples and procedures relating to harassment and bullying are set out in the Company's **Dignity & Respect Policy**.

## 7. Reasonable Adjustments

The Company will make **reasonable adjustments** to remove or reduce disadvantages experienced by employees or applicants with disabilities.

Adjustments may include (but are not limited to):

- working hours or working patterns;
- duties or responsibilities;
- equipment, technology or workspace;
- recruitment, selection or assessment processes.
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Requests for reasonable adjustments should be discussed with the employee's manager and **People & Culture**.

## 8. Fair Pay and Equal Pay

The Company is committed to ensuring **equal pay for equal work**, including work rated as equivalent or of equal value.

Pay and reward decisions will be based on **objective and non-discriminatory criteria**, which may include:

- role requirements and responsibilities;
- skills, qualifications and experience;
- performance and contribution;
- market considerations, where appropriate.
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The Company will not discriminate in pay or benefits on the grounds of any protected characteristic.

Where appropriate, the Company may review pay structures and practices to identify and address any unjustified pay disparities.

Employees who have concerns relating to pay equality or fair reward should raise them in accordance with the Company's **Grievance Policy & Procedure**.

## 9. Positive Action and Inclusion

Where lawful, the Company may take **positive action** to:

- encourage applications from under-represented groups;
- support inclusive talent development;
- remove barriers to participation or progression.

Positive action will be applied in accordance with legislation and will not result in less favourable treatment of others.

## 10. Recruitment and Selection

Recruitment and selection decisions will be based solely on:

- skills;
- experience;
- qualifications; and
- the ability to perform the role.

The Company will ensure recruitment practices are **fair, transparent, inclusive and free from bias**.

Pay offers will be determined using **objective criteria** and applied consistently to avoid unjustified pay disparities.

## 11. Responsibilities

### Employees

All employees are responsible for:

- complying with this policy;
- treating others with dignity, respect and inclusion;
- demonstrating Company values in behaviour and decision-making;
- raising concerns where they believe discrimination or exclusion has occurred.

### Managers

Managers are responsible for:

- implementing this policy fairly, consistently and inclusively;
- ensuring decisions are objective, evidence-based and values-led;
- addressing concerns promptly and sensitively;
- fostering inclusive team environments;
- seeking advice from **People & Culture** where required.
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### The Company

The Company will:

- provide training and guidance where appropriate;
- promote inclusive practices across the organisation;
- monitor equality, diversity and pay practices;

- investigate complaints fairly and confidentially;
- take appropriate action where breaches occur.

## 12. Complaints and Enforcement

Any employee who believes they have been subjected to discrimination, harassment, victimisation, exclusion or unfair pay practices should raise the matter in accordance with the Company's:

- **Dignity & Respect Policy**, or
- **Grievance Policy & Procedure**.

All complaints will be taken seriously and investigated fairly.

Breaches of this policy may result in action under the Company's: **Code of Conduct & Behaviour Policy**, and **Disciplinary Policy & Procedure**, including, where appropriate, dismissal.

## 13. Personal Liability

Employees may be held **personally liable** for acts of unlawful discrimination, harassment or victimisation committed during the course of employment.

Such behaviour may also expose the Company to legal liability.

## 14. Policy Review

This Policy is authorised by the Managing Director and will be reviewed regularly to ensure continued suitability and effectiveness.