



UNITED PETFOOD

**Anti-Discrimination,
Anti-Harassment and Equal
Opportunities policy**

Version 2

Approved by the board of directors: 30 08 2024





Anti-Discrimination, Anti-Harassment and Equal Opportunities policy

A policy to ensure equal treatment and prevent discrimination and harassment within the company.

1. Scope of application

This Anti-Discrimination, Anti-Harassment and Equal Opportunities policy (the “Policy”) applies to United Petfood Group BV and each and every subsidiary company of United Petfood Group BV (hereinafter ‘United Petfood’ or ‘We’).

2. Introduction

United Petfood respects the right of everyone to a working environment free from discrimination and harassment and is therefore committed, jointly with our Diversity & Inclusion policy and Employee Health & Safety policy, to create and maintain a safe and healthy work environment in which people are fairly treated with dignity, decency and respect.

United Petfood strongly opposes against any form of behaviour, discrimination, harassment or victimisation, direct or indirect, on the grounds of age, race, religious beliefs, political opinions or philosophical beliefs, union memberships, creed, colour, ethnic origin, nationality, language, marital/parental status, pregnancy or maternity, gender identity or expression, sex, sexual orientation, health, disability or any other status protected by applicable local laws in hiring and other employment practices and to any form of less favourable treatment on these grounds.

Furthermore, United Petfood will not tolerate any behaviours of sexual harassment, violence, physical or verbal abuse, harassment, bullying or any similar forms of violations or inappropriate actions that are unwanted and unwelcome and/or which create an intimidating, offensive, or hostile work environment for our employees or people working for or with United Petfood.

The purpose of this Policy is to provide practical guidelines on how to support our commitment to treat all employees, suppliers and clients with dignity and respect in a workplace free from discrimination and harassment and to ensure that discrimination and harassment of any kind is prevented or identified and addressed appropriately.



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We recognise our legal obligations for the elimination of discrimination on the above grounds and will do everything in our power to achieve this.

3. Applicability

This Policy is applicable:

- to all United Petfood employees (full-time, part-time and temporary), including managers and supervisors, to job candidates, students, placements;
- to all third parties whenever dealing with United Petfood employees (e.g. suppliers, customers, (sub)contractors, consultants, vendors, guests). We do not tolerate harassment of employees by such third parties, nor do we tolerate harassment of such third parties by United Petfood employees;
- to all aspects of employment, recruitment and selection; to conditions and benefits; to training and promotion; to task allocations, shifts, hours, leave arrangements, workload and equipment;
- on-side to all United Petfood workplaces, premises and related settings as well as off-side, such as by phone, email or via social media, during after-hours events (e.g. business meetings, conferences, dinners, training), during work related travel, or between employees outside of working hours.

4. Targeted Measures

4.1. Employment Practices

Any employee has a personal responsibility to adhere to the principles of equality and equal opportunity and maintaining racial harmony. We will actively promote equal opportunities in our business to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Sexual, racial and other forms of harassment will not be tolerated. We will treat unfair discriminatory conduct by any member of staff as a disciplinary offence.

4.2. Monitoring and Review Arrangements

We will regularly monitor our policies to ensure that we pursue an effective policy of equal opportunity.

4.3. Grievance and Disciplinary Procedures



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We will ensure that any employee who feels that he or she has been treated unfairly or subjected to direct or indirect unfair discrimination/harassment can raise the matter through the appropriate grievance procedure where every effort will be made to secure a satisfactory resolution. For more information on how to file a complaint, please consult our Whistleblowing policy. Any employee making a complaint of unfair discrimination/harassment will be protected from any victimisation in any form.

4.4. Training

We will train, develop and promote on the basis of merit and ability and encourage all employees and applicants objectively.

4.5. Rehabilitation of Offenders

We will not discriminate against anyone who has a spent conviction in line with applicable legislation.

4.6. Equal Pay

Men and women are entitled to be paid equally without any bias on the grounds of sex. All reasonable steps will be taken to ensure that male, female, and non-binary workforce members receive equal pay for the same work and for work rated as equivalent and for work of equal value.

5. Discrimination and Harassment

5.1. Harassment at work

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by gender, sex or sexual orientation, marital status, race, colour, national or ethnic origin, nationality, religion or belief, pregnancy or maternity, age or disability it also amounts to infringement of equal employment opportunity.

We are committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned. Harassment takes many forms and employees may not always realise that their behaviour constitutes harassment. Such behaviour can range from extreme forms such as violence or bullying, actual physical abuse to less obvious actions like practical jokes and pranks and ridiculing colleagues or subordinates.



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Conduct becomes harassment if it persists after the recipient has made clear that it is regarded as offensive, although a single offensive act can amount to harassment if it is so serious as to be obviously offensive towards the recipient.

We commit ourselves to ensuring and maintaining a workplace environment that encourages and supports the right to dignity at work. The aim is to ensure that all employees are treated with the highest level of dignity and respect whilst at work, and are able, and encouraged to meet their full potential by working in a non-threatening environment free of harassment and/or bullying. Whatever form it takes, personal harassment and/or bullying is always taken seriously and is totally unacceptable. We will endeavour to take steps to ensure that such behaviour is treated as a disciplinary offence which will be subject to action in line with our procedures up to dismissal. All employees, management and associates have the responsibility to uphold this dignity at work charter.

5.2. Harassment at work by third Parties

Third party harassment can occur if an employee complains of harassment by a person who is not an employee, or when an employee harasses a client or a customer.

If you are subjected to harassment by anyone that you encounter in the course of your work, it is of utmost importance that you bring this to the attention of your manager or superior as soon as possible because we cannot take action to prevent this occurring unless we are made aware of it. We will take all reasonable steps to prevent this behaviour.

5.3. Sexual harassment at work

Sexual harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of a sexual nature, or which is based on a person's sex, and which is regarded as unwelcome or offensive to the recipient.

The following examples illustrate the types of conduct that may be treated as sexual harassment:

- unwanted physical contact or touching, or conduct which is intimidating, or physically or verbally abusive. Harassment can also be non-verbal, for example, staring or gestures;
- lewd or abusive comments about appearance;
- suggestions that sexual favours may further a person's career, or that refusal may hinder it;



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- sexual advances, propositions, suggestions or pressure for sexual activity at or outside work;
- derogatory or demeaning remarks based on gender, or the display of sexually explicit material in the workplace.

Sexual harassment is a denial of equal employment opportunity and has the effect of insulting and demeaning the employee who is harassed.

5.4. Racial Discrimination

Racial harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of a racial nature, or which is based on a person's race, skin colour or ethnic origins, and which is regarded as unwelcome or offensive to the recipient.

The following examples illustrate the sort of conduct that may be treated as racial harassment:

- Jokes about race, skin colour or ethnic origin;
- Offensive names used;
- References to people by offensive racist descriptions;
- Verbal or physical abuse because of a person's race, skin colour or ethnic origin;
- Detrimental behaviour because of a person's race, skin colour or ethnic origin;
- Denial of opportunity because of race, skin colour or ethnic origin.

This Policy applies to verbal and physical actions as well as any other form of communication including electronic communication such as text messages, emails, and faxes as well as written communications.

5.5. Age Discrimination

Discrimination or harassment on grounds of age by employers is prohibited in the areas of recruitment, promotion and training. There can be direct and indirect age discrimination.

It is unlawful for an employer to discriminate against a person in the arrangements made for the purpose of determining to whom employment should be offered, the terms on which that person is offered employment and by refusing to offer, or deliberately not offering, employment.

Similarly, it is unlawful for an employer to discriminate against that person in the terms of employment, in the opportunities for promotion, a transfer, training, or receiving any other benefit, by refusing or deliberately not affording that person



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any such opportunity or by dismissing or subjecting that person to any other detriment.

There are certain circumstances when some of the regulations may not apply in relation to genuine occupational requirements of employment.

6. Complaining about discrimination/harassment

If you believe you are the subject of discrimination/harassment you should make a formal complaint. Depending on the seriousness of the allegation, the alleged employee may be suspended, while the matter is being investigated.

The aim throughout is to resolve the complaint of harassment sensitively, impartially, effectively and quickly.

6.1. Informal complaint

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the HR Manager who will be responsible for investigating the matter if it becomes a formal complaint.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

6.2. Formal complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of the HR Manager as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- the name of the alleged harasser;
- the nature of the alleged harassment;
- the dates and times when the alleged harassment occurred;
- the names of any witnesses; and
- any action already taken by you to stop the alleged harassment.



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On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation, which will normally be within ten working days of the meeting with you, the decision of the investigator, detailing the findings, will be sent in writing to you.

If the decision is that the allegation is well founded, the harasser will be liable to disciplinary action in accordance with our disciplinary procedure. An employee who receives a formal warning or who is dismissed for harassment may appeal by using our capability/disciplinary appeal procedure.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the grievance procedure.

There will be no victimisation of any employee for making or supporting or assisting a complaint of harassment – even if the complaint is not upheld – provided the action was taken in good faith. However, if it is concluded that the complaint is both untrue and has been brought with malicious intent, disciplinary action can be taken against you.

7. Governance - Roles - Responsibilities

The General Manager is responsible for implementing and monitoring this Policy at the relevant subsidiary under its supervision. This includes ensuring that all operations/activities align with the Policy's objectives and that employees comply with its guidelines. Severe violations of the Policy should be reported to Group Management, and if necessary, to the Board of Directors.

8. General

This Policy takes effect on September 1st, 2024 and replaces all previous Anti-Discrimination, Anti-Harassment and Equal Opportunities policies at group level.



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Where a local Anti-Discrimination, Anti-Harassment and Equal Opportunities policy is implemented at the relevant subsidiary, or local standards, law and regulations differ from this Policy, the most stringent rules shall apply.

United Petfood reserves the right to amend this Policy at any time.