

## Diversity & Inclusion Policy

### 1. Introduction

We believe that people are at their happiest and most motivated when they can bring their whole selves to work. We want SEGRO to be a place where everyone can feel free to be themselves by creating a working environment which is inclusive, free from bias and has equal opportunities for all.

At SEGRO we define diversity, inclusiveness and equal opportunity in the following way:

**Diversity is about individual differences.** Everyone one of us is different and in SEGRO we value and respect individual differences.

**Inclusiveness is about leveraging these differences to achieve great business results.** We believe in creating an environment where our teams feel they are valued; where they are able to bring their differences to work each day and where they feel able to make their own unique contribution.

**Equality of opportunity is exactly what is says.** It means we believe everyone deserves the right to be treated equally throughout their employment with us and should not be discriminated against because of their differences, such as age, gender, disability, ethnicity, gender identity and expression, religion or sexual orientation.

### 2. Policy Statement

This policy reflects our intention to promote diversity and inclusion in SEGRO and to safeguard the right of all our employees to be treated fairly and respectfully within the workplace.

In accordance with the above aims, the Group is committed to treating all of its employees and potential employees equally on the basis of merit and ability to do the job without being improperly influenced by factors such as race, religion or belief, sex, marital status, sexual orientation, gender reassignment, disability, age or any other grounds which are unjustifiable in terms of equality of opportunities.

The Group is committed to equal opportunity in the areas of recruitment, selection, promotion, transfer, training, access to benefits and services, options for flexible working, redundancy, discipline and dismissal.

It is also our policy that all employees should be allowed to work in an environment free from harassment, bullying and unsolicited or unwelcome comments or approaches on discriminatory grounds.

### 3. What is Discrimination?

Discrimination is where someone is disadvantaged or not treated the same as everyone else because of their age, disability, gender, sexual orientation, religion, ethnicity, gender reassignment or marital status.

### 4. What is Harassment?

Harassment can take many form, but generally it is seen as unwanted behavior that's intended to be or has the effect of being intimidating, embarrassing, humiliating or offensive.

### 5. What is Sexual Harassment?

*Sexual harassment includes any unwelcome verbal or physical behavior that creates a hostile work environment. The victim of the harassment may not be just the target of the offense, but anyone who is affected by the inappropriate behavior.*

**Examples:**

- Sharing sexually inappropriate images or videos, such as pornography, with co-workers
- Sending suggestive letters, notes, or e-mails
- Displaying inappropriate sexual images or posters in the workplace
- Telling lewd jokes, or sharing sexual anecdotes
- Making inappropriate sexual gestures
- Staring in a sexually suggestive or offensive manner, or whistling
- Making sexual comments about appearance, clothing, or body parts
- Inappropriate touching, including pinching, patting, rubbing, kissing or purposefully brushing up against another person
- Asking sexual questions, such as questions about someone's sexual history or their sexual orientation
- Making offensive comments about someone's sexual orientation or gender identity

**6. What is Bullying?**

Bullying is a repeated aggressive behaviour where one person (or group of people) in a position of power deliberately intimidates, abuses, or coerces an individual with the intention to hurt that person physically or emotionally. Acts of bullying can be physical or verbal.

**7. What is Victimisation?**

Victimisation occurs when someone is treated badly because they have made or supported a complaint or because they are suspected of doing this.

**8. Implementation**

The Executive Committee has the ultimate responsibility for this policy and the Group HR Director coordinates the policy's implementation and can deal with any queries relating to it.

**9. Laws**

We believe government laws, regulations and business practices should uphold the principles of diversity, inclusion and equality. While laws may vary in the countries where we operate, we remain committed to an inclusive and diverse workplace.

**10. Responsibility of All Employees**

We recognise that being an equal opportunity employer requires a commitment from all employees and that is an ongoing and evolving process.

All managers and employees have an individual responsibility to (i) adhere to this policy, (ii) ensure that all individuals under their supervision adhere to this policy and (iii) ensure that fellow employees and any third parties with whom they or fellow employees deal on behalf of SEGRO are treated at all times with dignity, courtesy and respect (iiii) Report any harassment or anything witnessed from any third party (e.g. a customer or contractor).

Employees are expected, by their behaviour, to demonstrate commitment to this policy and its aims.

Managers also have an individual responsibility to (i) maintain a working environment which promotes the dignity and respect of all employees and (ii) provide appropriate support and protection (including from victimization for an employee who is involved in a possible or actual complaint under this policy

(whether formal or informal). The employee could be a possible or actual complainant, the person being complained about or any witnesses who has given evidence in connection with the complaint.

The Group will make diversity training available to all employees to raise their awareness of issues concerning their conduct and behaviour at work. This will ensure that they are aware of their individual responsibilities within the fields of equal opportunities and dignity at work and that they know how to support and comply with this policy.

## 11. Grievance Procedure

If an employee believes that their rights under this policy may have been breached, then initially, it may be appropriate to attempt to resolve the issue informally by approaching the person in breach and outlining what they are unhappy with. If an employee would find this too difficult or embarrassing, then they should seek support from an HR Business Partner.

If an employee feels that an attempt at informal resolution is inappropriate given the seriousness of their complaint or if informal attempts have failed or been unsatisfactory, then a formal complaint may be made to an HR Business Partner. This should be in writing and set out the complaint in depth. An investigation will be carried out as quickly as possible (depending upon the individual nature of the complaint and the availability of those allegedly involved to be interviewed). The complainant, the person that the complaint is about and any relevant witnesses will be interviewed formally. Following the investigation, the complainant and the person that the complaint is about will be told of the findings and formal summary letters issued.

If the complainant is dissatisfied with the outcome or the way in which their complaint was handled, they should submit an appeal to the Group HR Director within ten working days of receipt of the written findings. The Group HR Director will hear the appeal and their decision on it will be final and binding within the Group.

If the findings disclose evidence of a possible disciplinary offence, then disciplinary proceedings will be commenced in accordance with our dismissal and disciplinary policy. A breach of this policy may constitute an act of gross misconduct which may, for example, lead to summary dismissal (without notice or pay in lieu) or disciplinary transfer (whether temporarily or permanently) to different duties or a different location. It will also be considered a disciplinary offence under this policy to bring a complaint in bad faith, or maliciously, or to victimise an employee for bringing a complaint in good faith. These incidents will typically constitute acts of gross misconduct which could lead to summary dismissal. Where a complaint is not upheld because, for example, the evidence is inconclusive, it may nonetheless be appropriate for us to consider informal ways of addressing the issues raised.

At all meetings under this procedure, attendees may be accompanied by a fellow employee. All members of the HR department have received appropriate training in resolving equal opportunities and dignity at work issues. They will deal with any grievances raised with them under this policy in the strictest confidence save to the extent that anyone else involved in the grievances reasonably needs to be made aware of them.

**In situations where an individual doesn't feel that they can report the incident(s) to their Manager, another Senior Manager or a member of the HR team, they can report the incident to an independent and confidential line by calling +44 (0)800 915 1571 or by emailing [segro@safecall.co.uk](mailto:segro@safecall.co.uk)**

## 12. Monitoring, Review and Record Keeping

The Group may monitor conditions for all employees and its selection procedures in order to ensure that the introduction of this policy is having the desired effect of ensuring equal opportunities for all at work, eliminating unlawful discrimination of all forms and protecting employees' dignity at work.