



RESPECT AND TRUST
EACH OTHER



KEEP THE CUSTOMER AT THE
HEART OF WHAT WE DO



BE PROUD OF
WHAT WE DO



GET IT RIGHT,
KEEP IT RIGHT



BAKKAVOR

Inclusion and Diversity Policy

All Bakkavor UK contracted colleagues

Description:

Policy Applicable to: All Bakkavor UK Contracted Colleagues

Policy Owner: Donna-Maria Lee, Chief People Officer

Last Updated: 10/09/2025

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Statement of Intent

Purpose of this Policy

To lead the way through flawless execution, delighting customers and consumers with fresh, convenient and great-tasting food that we create every day.

We understand that achieving this vision is made possible by the skills, experience, and dedication of our diverse and talented workforce. Their contributions are the foundation of our continued success.

Scope of this Policy

This policy applies to all individuals working for Bakkavor including job applicants, as well as third parties acting on our behalf. This includes secondees, advisors, agency workers, contractors, and partner organisations.

To support and uphold our commitment to Inclusion and Diversity, we have a range of associated policies and procedures in place. These include, but are not limited to, our policies on Flexible Working, Disciplinary and Grievance, Bullying and Harassment, Sexual Harassment, Whistleblowing, Code of Conduct and Resourcing policy. This Inclusion and Diversity Policy, along with the actions we take to support it, will be reviewed regularly to ensure we are meeting our commitments and continuously improving.

Our commitments

At Bakkavor, our values are the foundation of who we are and how we work. They shape the way we interact with each other, our customers, suppliers, investors, and the communities in which we operate.

Our values promote collaboration, openness, honesty, and fairness. They guide our behaviours and decisions, helping us to create a culture where everyone feels respected, valued, and part of a team.

Our values are:

- Respect and trust each other
- Keep the customer at the heart of what we do
- Get it right, keep it right
- Be proud of what we do

Inclusion and Diversity In the workplace

What is your role as a colleague?

Each of us plays a vital role in upholding Inclusion and Diversity in the workplace. The way we treat one another directly shapes our culture, so it's important that you:

- **Familiarise yourself with this policy** and act in line with its principles to demonstrate your commitment to inclusion and diversity.

- **Collaborate with leaders** to help build an inclusive environment where differences are respected, valued and celebrated.
- **Treat everyone with respect**, ensuring your language, behaviour and actions reflect both this policy and our core values.
- **Be mindful of how your actions may be perceived** and remain aware of the diverse perspectives and sensitivities of others.
- **Speak up if you witness behaviour** that breaches this policy or goes against our core values

What is your role as a manager?

One of the Bakkavor Values is 'Respect and trust each other'.

As leaders in this business, you play a crucial role in setting the tone for an inclusive and respectful workplace. You are expected to lead by example and act as ambassador for our values and the principles of this policy by:

- **Working collaboratively with** colleagues to foster and maintain an inclusive environment where individual differences are respected and valued.
- **Ensuring that all employment-related decisions** including those related to recruitment, training, promotion and career development are fair, objective and free from discrimination.
- **Addressing inappropriate behaviour** promptly and effectively, whether you witness it directly or it is reported to you by others.

Ultimate responsibility for the operation and implementation of this policy rests with Donna-Maria Lee, Chief People Officer

What are Protected Characteristics?

Protected Characteristics' is a term used in the Equality Act 2010 (the "Act") to describe aspects of a person's identity that are legally protected from direct or indirect discrimination. There are nine Protected Characteristics under the Act are as follows:

- Age
- Sex
- Race
- Disability
- Religion or Belief
- Sexual Orientation
- Gender Re-Assignment
- Marriage or Civil Partnerships
- Pregnancy or Maternity

At Bakkavor we take a zero-tolerance approach to any form of unlawful discrimination (direct or indirect), bullying, harassment or victimisation in any form whatsoever. This applies in the workplace, outside the workplace (when dealing with colleagues, customers, suppliers or other work-related contacts or when wearing a work uniform), and on work related trips or events including social events as well as social media.

We believe our leaders must lead by example, embodying our values and actively addressing any behaviour that falls short of our standards. Every colleague shares the responsibility respect and trusts each other. Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including dismissal. We encourage all colleagues to speak up if they witness or experience anything that may be contradictory to this policy or Bakkavor's values.

What is Discrimination?

The following forms of discrimination are prohibited under this policy and are unlawful:

Direct discrimination is treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because of their sexual orientation.

Indirect discrimination occurs when a provision, criterion, or practice is applied 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. Such a requirement would be discriminatory unless it can be justified.

Bullying is intimidating, offensive, or insulting behaviour making a person feel vulnerable, upset, or threatened. It is not constructive criticism.

Anti-Bullying and Harassment policy

Harassment is any unwanted physical, verbal, or non-verbal conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them. A single incident can amount to harassment. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, examples include, but are not limited to:

- Mocking or belittling a person's disability
- Unwelcome sexual advances,
- Sending or displaying material that is pornographic or that some people may find offensive
- Racist, sexist, homophobic, or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender.

Sexual Harassment policy link [Sexual Harassment Policy](#)

Victimisation is retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

Disability discrimination includes direct and indirect discrimination, harassment, victimisation, any unjustified unfavourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Our Commitment to Inclusion and Accessibility

We are committed to fostering an inclusive workplace by removing unnecessary barriers so that individuals of all abilities can thrive, succeed, and reach their full potential.

A disability is defined as “a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.” We believe it is essential that individuals with disabilities are treated fairly and are not subjected to any form of unlawful discrimination.

If you have a disability or become disabled, we encourage you to share this with us so we can provide the appropriate support. Our goal is to ensure equal opportunities for all, and we are committed to supporting colleagues with disabilities in the following ways where possible:

- Making reasonable adjustments to the workplace
- Providing accessible tools and resources
- Offering flexible working arrangements
- Ensuring inclusive recruitment and development practices,
- Creating an environment where everyone has the opportunity to develop.

Where necessary, Bakkavor may arrange via an appointed Occupational Health Consultant or an individual's GP/Consultant for a colleague's capabilities to be assessed with a view to identifying what reasonable adjustments may be made or, should this not be appropriate, what suitable alternative work may be available for that individual.

Access to Work

This is a government body (UK only) which offers advice, support, and workplace assessments for any colleague who has a disability or long-term health condition which requires workplace adjustments. Grants may be available to help cover the costs of workplace adaptations to enable you to carry on your role without being at a disadvantage.

Building an Inclusive and Diverse Workforce

We are committed to ensuring that our recruitment processes are inclusive and accessible to all. This includes offering reasonable adjustments and tailored support throughout every stage of the recruitment and selection process, from submitting applications to attending interviews and starting employment.

Our approach is rooted in fairness: we select candidates based on their relevant skills, experience, and potential. To uphold this standard, we regularly review our recruitment practices to ensure they remain free from bias and discrimination.

We also place strong emphasis on internal recruitment and promotion, providing all colleagues with equal access to meaningful career development opportunities and the chance to grow and progress within the business.

Policies Procedures Resourcing and Recruitment

Part-time and fixed-term work

Part-time and fixed-term colleagues should be treated the same as comparable full-time or permanent colleagues and enjoy no less favourable terms and conditions (on a pro rata basis where appropriate), unless different treatment is justified.

Providing equal opportunities to succeed

At Bakkavor, we are committed to creating an environment where everyone has the tools, support, and opportunities they need to thrive in their role.

Training

Training needs are identified through regular performance appraisals, based solely on objective assessments. All colleagues will have fair and appropriate access to training opportunities that support their development and progression within the company. Promotion decisions are made strictly on merit.

We believe in empowering our people by offering learning and development programmes that are relevant, accessible, and timely.

Our approach supports the diverse career needs and aspirations of our colleagues, helping each individual to grow, succeed, and reach their full potential.

Termination of employment

We are committed to ensuring that all employment termination processes are fair, transparent, and free from discrimination. Redundancy criteria and procedures will be applied objectively and consistently, without directly or indirectly disadvantaging any individual.

Similarly, disciplinary and other formal procedures, including warnings, dismissals, or other actions, will be conducted in a fair and impartial manner, in line with our policies and without discrimination of any kind.

Our investment in you

At Bakkavor, we believe actions speak louder than words, which is why we invest in meaningful training and development. In today's diverse and ever-evolving world, staying informed and aware is essential.

Managers will receive dedicated training to help them recognise and prevent discrimination, harassment, and victimisation, while actively promoting equality, diversity, and inclusion, particularly in recruitment, development, and promotion decisions.

All colleagues will be provided with regular training to ensure a clear understanding of this policy and its principles. This learning is an integral part of the onboarding process and continues throughout your journey with us. Ongoing participation in this training helps ensure we all remain informed, inclusive, and aligned with our values.

Breaches of this policy

We take any breach of this policy seriously. All concerns will be addressed in line with our Disciplinary Policy. Serious incidents of unlawful discrimination, harassment, or victimisation may constitute gross misconduct and could result in dismissal.

If you believe you have experienced or witnessed harassment, bullying, or discrimination in the workplace, you are encouraged to raise your concerns through our Grievance Policy and, where applicable, our Anti-Harassment and Bullying Policy. All complaints will be handled confidentially and investigated appropriately.

We are committed to protecting colleagues who speak up. There must be no victimisation or retaliation against anyone who raises a concern or reports discrimination.

How do I report a concern?

If you are concerned about any form of wrongdoing or suspected wrongdoing covered by this policy, and it is appropriate to do so, you should first raise these issues either verbally or in writing to your line manager.

If you feel that you cannot tell your line manager, for whatever reason, or it is not appropriate to do so, you should raise the issue with a senior manager or with your Local HR team, or via our Whistleblowing Policy.

If you have raised concerns and are still concerned, or the matter is so serious that you feel you cannot discuss it with your managers, you should raise the matter immediately with the Managing Director or General Manager for the business unit concerned, or the Chief People Officer or General Counsel.

Speak Up Hotline & Online Service

If you are not comfortable reporting your concern to any of these individuals, or it is not appropriate to raise the concern internally, you can contact Bakkavor's independent "Speak Up" hotline.

“Speak Up” is operated by an independent company, Navex Global that provides a confidential reporting service. The service is available by Freephone or online 24 hours per day / 365 days per year and is available in 15 languages.

United Kingdom & Northern Ireland 0800-086-9965

Alternatively, concerns can also be reported anonymously and confidentially using the secure online web service which can be accessed by going to the following website URL: www.bakkavor.ethicspoint.com

Once a report is made either by calling the Speak Up hotline or via the online service, you will receive a reference case number that can be used to track the progress of your case, along with any comments that the HR colleague investigating the claim has made.

We encourage the reporting of all forms of potential discrimination, as this helps us uphold our commitment to inclusion and diversity. However, knowingly making a false allegation in bad faith is a serious matter and will be treated as misconduct under our Disciplinary Policy.

How are records kept?

All associated documentation will be treated as confidential and kept in accordance with the principles of the Data Protection Act 2018, which state that any personal data kept should be necessary, fairly and lawfully processed, relevant, accurate and secure.

Additional Information

Inclusion and Diversity is at the heart of our business strategy and the core values we live by. We are proud of our diverse colleague base and the enrichment this brings. This enables us to provide a great environment to work, an amazing service to our communities and create a culture where everyone can reach their fullest potential and be the best version of themselves.

We believe that by embracing our differences, we unlock shared understanding and discover how much we truly have in common.

Our commitment to inclusion is reflected in the creation of four employee network groups, each designed to celebrate and support diversity in action. These groups focus on:

- **Disability**
- **Ethnicity**
- **LGBTQ+**
- **Gender**

To learn more about these networks and how to get involved, please visit our company intranet.

Wellbeing Champions

We have a number of wellbeing champions you can also contact for more information, please visit our company intranet.

If you have any questions or ideas about inclusion and diversity, please speak to your manager or your HR contact. If you are a manager and need advice, please contact your HR team.

Policy Do's & Don'ts



DO

1

Treat everyone with respect

Use inclusive language and behaviour that reflects company values

2

Speak up

Report any behaviour that breaches the policy or goes against Bakkavor's values

3

Collaborate to build inclusivity

Work with others to create an environment where differences are respected and celebrated

4

Make fair decisions

Ensure recruitment, promotion, and development decisions are free from bias and discrimination

5

Support accessibility

Make reasonable adjustments for colleagues with disabilities and promote equal opportunities

DON'T

1

Don't discriminate

Avoid any form of direct or indirect discrimination based on protected characteristics

2

Don't tolerate bullying or harassment

This includes offensive jokes, unwanted advances, or hostile behaviour

3

Don't retaliate

Never victimise someone for raising a concern or supporting a complaint

4

Don't ignore inappropriate behaviour

Employees should speak up when they witness inappropriate behaviour, even if not directed at them. Managers must act promptly and effectively when issues arise

5

Don't make biased decisions

Avoid assumptions or stereotypes in any employment-related actions