

EQUALITY, DIVERSITY & INCLUSION POLICY

*This document is owned by the Environmental & Social Committee
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1. INTRODUCTION

- 1.1 ECOM Agroindustrial Corp. Limited and the companies within its group (together "ECOM", "we", "our" or "us") commits fully to implementing equality, diversity and inclusion in respect of our entire business and associated responsibilities.
- 1.1 ECOM is committed to the elimination of unlawful and unfair discrimination and we value the differences that a diverse workforce brings.
- 1.2 Our aim is to ensure equality of opportunity for all, unlocking the talents of people from all backgrounds, through our policies and practices.
- 1.3 We continuously develop our practices to identify and address the barriers and opportunities relating to equality and diversity throughout our business so that all individuals feel respected and able to give their best.
- 1.4 This policy is updated from time to time to reflect changes in the law, demographics and internal business requirements.

2. BASIC PRINCIPLES

- 2.1 ECOM does not discriminate on the grounds of any of: age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.
- 2.2 We strive to build a culture that values meritocracy, openness, fairness and transparency. ECOM is working continually to promote equal treatment and embrace diversity in employment.
- 2.3 We recognise the problem of discrimination and we are committed to play our part.
- 2.4 ECOM values people as individuals with diverse opinions, cultures, lifestyles and circumstances and this policy applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. Our policies and practices are reviewed and amended as necessary, to ensure that they protect against discrimination - unfair or unlawful, intentional or unintentional, direct or indirect.
- 2.5 Specifically but not exclusively, ECOM seeks to support all individuals reaching their full potential in the workplace, regardless of their gender. ECOM recognises the breadth of experiences and perspectives that gender diversity brings to the workplace through creativity, innovation, problem solving, decision-making, employee morale and retention.

3. OUR RESPONSIBILITY

- 3.1 ECOM has a legal obligation to ensure that the organisation and its employees do not discriminate on the grounds of gender, marital status, sexual orientation, age, race, colour, nationality, disability or religious belief. Although the primary responsibility for this rests with senior management, it is essential to ensure the policy is clearly known, understood, and adhered to by all employees.

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- 3.2 ECOM will in particular:
- 3.2.1 Create an environment in which individual differences and the contributions of all employees are recognised and valued;
 - 3.2.2 Not tolerate any form of intimidation, bullying or harassment - every employee, worker or contractor is entitled to a working environment that promotes dignity and respect;
 - 3.2.3 Provide training, development and progression opportunities to employees;
 - 3.2.4 Regularly review ECOM employment practices and procedures to ensure fairness;
 - 3.2.5 Ensure that employees are aware of our policies, procedures and practices on equality, diversity and anti-discriminatory practices and kept informed of any changes or developments;
 - 3.2.6 Provide support to any employee who is subjected to unlawful or unacceptable discrimination in the course of their employment;
 - 3.2.7 Take appropriate action if employees have acted in breach of this policy.

4. RESPONSIBILITY OF OUR EMPLOYEES

Employees of ECOM are responsible to embed and nurture this policy. Whilst primary responsibility for eliminating discrimination and promoting equality rests with senior management, individual employees have the duty to ensure that they do not discriminate unfairly or knowingly cause ECOM to do so.

5. CONCERNS & ENFORCEMENT

- 5.1 ECOM has a Group Human Resources Policy which includes a grievance mechanism should any employees wish to express their concerns relating to this policy. External stakeholders who wish to raise a concern relating to this policy can do so by reference to the Ethics Concerns policy available here: <https://www.ecomtrading.com/social-environmental-responsibility/#ethics-policy>.
- 5.2 ECOM enforces this policy and monitors compliance with its terms.
- 5.3 Any ECOM employee who fails to comply, either in letter or spirit, with this policy may be subject to disciplinary action, up to and including termination of employment. ECOM may pursue appropriate legal action against present or former employees to enforce ECOM policies.