

Equality, Diversity and Anti-Harassment Policy

MORE.COM
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Policy Statement

1. Taking into account the applicable legal and regulatory framework, as well as its structure, size and business model, More.com adopts and implements the present Policy, which shall be subject to any local law requirements applicable in the different countries where the Company operates.
2. As an equal opportunities' employer, More.com is committed to eliminating unjustified discrimination, promoting equality of opportunity, ensuring good relations exist between employees, and encouraging diversity throughout our workforce. Furthermore, More.com commits to undertaking any measures necessary to prevent, correct and discipline any behavior constituting violence, harassment, unlawful or unfair discrimination.
3. More.com aims to be truly representative of society and for all employees to feel respected. The purpose of this policy is to promote equality and fairness for all employees, applicants and other stakeholders, and not to discriminate in any form on the grounds of protected characteristics such as (but not limited to) age, disability, marriage and civil partnerships, pregnancy, maternity, race or ethnicity, religion or belief, gender identity or expression, or sexual orientation. Furthermore, through the present policy, More.com aims to ensure a 'zero tolerance' environment for any behavior constituting violence or harassment in the workplace, in accordance with applicable laws and regulations.
4. More.com opposes ALL forms of unlawful or unfair discrimination, as well as any harassment or violence that occur in the working environment or are related to work. All employees, whatever the form of their working relationship with More.com, whether part-time, full-time or temporary, as well as external service providers and consultants will be treated fairly and with respect. Selection for employment, promotion or any other benefit will be based on skill, aptitude and ability. As such, all other policies must be considered in unison with this policy and no policy, process or procedure should be followed in a manner that may in any way breach this policy or be discriminatory.
5. More.com is fully committed to ensuring that it fully complies with the requirements of any local relevant legislation relating to equality, diversity, harassment, and discrimination.

Responsibility

1. ALL employees of More.com have a responsibility for ensuring that they adhere to the Equality, Diversity & Anti-Harassment Policy of the company and apply its principles in their day-to-day dealings with fellow employees, applicants, clients, contractors and any other relevant stakeholders. The rules stipulated within this policy also apply to comments and behavior that take place outside of the workplace that may bring the company into disrepute with regards to equality and diversity practices, as well as behavior which may constitute violence or harassment. For example, discriminatory remarks made on social media, that may be accessed by other employees may be considered a breach of this policy. Also, violence and harassment may take place in the workplace, including public and private spaces and places where the employee provides work or takes a break, as well as commuting to and from work and work-related events and social activities. Behavior

constituting violence or harassment may also take place in work-related communications, including those carried out through information and communication technologies.

2. All employees must accept that any breaches to this policy are wholly unacceptable and may be dealt in line with the disciplinary policy of the Company. Any form of discrimination or harassment, whether intentional or not, may be treated as either misconduct or gross misconduct, and may, dependent upon the specific circumstances lead to disciplinary action (up to and including dismissal) or immediate suspension while the appropriate disciplinary investigation is being carried out.
3. If any breaches of the present Policy regarding behavior constituting harassment or violence give rise to investigations by police or judicial authorities, More.com undertakes to provide any assistance required in such proceedings.
4. All employees have a responsibility for reporting any breaches of this policy to their Line Management, a member of the Senior Management team or the HR Department as soon as practicably possible. This includes instances where another individual has been subjected to any form of discrimination from another employee or stakeholder.

Apart from the above, all employees may report breaches of the present policy anonymously in accordance with More.com's Whistleblowing Policy. Whatever the reporting channel (in accordance with either the process of Disciplinary Policy or the process of Whistleblowing Policy), More.com undertakes to protect the confidentiality of the informant, as well as the personal data of the victim and the respondent.

5. Even though the discriminatory behavior may not be aimed at the employee, all employees have a responsibility for ensuring that the company as a whole are compliant with their legal, moral and ethical obligations as detailed in this policy.
6. Line Managers are responsible for using their best endeavors to ensure that their respective teams behave in a manner that is fully compliant with this policy. If a Line Manager is aware of discriminatory remarks or behavior breaching or potentially in breach of the present Policy but fails to take appropriate corrective action, they may be deemed guilty of indirect discrimination or harassment even if they are not the ones behaving in a directly discriminatory manner. Line Managers must not ask or induce other members of staff to behave in a manner that is potentially discriminatory or in breach of this policy. If an employee believes that their Line Manager has encouraged them to behave in a manner that is discriminatory or in breach of this policy, they should raise this with either their Line Manager's Superior, a member of Senior Management, the HR Department of the company, or in line with the Company's Whistleblowing Policy as soon as practicably possible.
7. The HR Department is responsible for ensuring that training on this policy is delivered to Line Managers (if applicable) and that any changes made to this policy are communicated to all employees in a timely manner. The HR Department of the company is also responsible for reporting any allegations of discrimination, harassment, or violence as soon as is practicably possible to the Functional Head or Manager/Country Manager and the CEO.
8. All competent personnel who, in the course of their duties, receive relevant information, or obtain knowledge of complaints, reports or other information regarding possible breaches of the present Policy or of relevant investigations following any such reports are bound by a

duty of confidentiality. The irregular disclosure of any such information shall be considered in itself as grounds for disciplinary action or dismissal by More.com.

9. For the purposes of the present Policy, the HR Manager is designated as liaison, responsible to provide guidance and information on the prevention and correction of violence and harassment at work.

Definitions

The following terms are utilized throughout this (and other) policy documents:

Equality	The creation of a fairer society where everyone can participate and has the opportunity to fulfil their potential. Equality concerns fairness and compliance with legislation designed to address unlawful discrimination against those who share a protected characteristic.
Diversity	Recognizing and valuing difference in its broadest sense. Diversity concerns creating a culture that recognizes, respects, values and harnesses difference for the benefit of staff, clients and other relevant stakeholders.
Protected Characteristic	Protected characteristics are the grounds on which discrimination is unlawful, including (but not limited to); age, disability, gender identity or expression, marriage and civil partnership, pregnancy and maternity, race or ethnicity, religion or belief, sexual orientation.
Direct Discrimination	The less favorable treatment of a person because of a protected characteristic.
Indirect Discrimination	The use of apparently neutral provision, criterion or practice which puts people with a particular characteristic at a disadvantage compared with others who do not share that characteristic, and applying that practice, provision or criterion where it cannot be objectively justified.
Discrimination by Association	Discrimination against an individual who does not have a protected characteristic but because of their association with someone who does.
Discrimination by Perception	Discrimination against an individual because of a perception that they have a protected characteristic.
Violence and Harassment	Any stand-alone or repeated behavior, actions, practices or threats thereof, which aim at, lead, result in or may result in physical, psychological, sexual or financial harm.
Harassment	Unwanted behavior that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

<p>Gender-based Harassment</p>	<p>Any behavior related to a person’s gender, which aim at or result in the violation of that person’s dignity and the creation of an intimidating, hostile, offensive, humiliating, or hostile environment. Such behavior may also include sexual harassment, as defined in accordance with the applicable legal framework, as well as other forms of behavior related to the sexual orientation or the expression, identity or characteristics of a person’s gender.</p>
<p>Victimisation</p>	<p>Where a person is subjected to a detriment because they have a previously made or supported a complaint under the Equality Act 2010, or because they are suspected of doing so. Protection against victimization is not provided if the complaint is made maliciously or those supporting the complaint know it to be untrue or malicious.</p>

Expectations

More.com are committed to the following:

1. Creating an environment in which individual differences and contributions of all employees are recognized and valued;
2. Providing a working environment that promotes dignity and respect for all. No form of intimidation, bullying, harassment or violence will be tolerated;
3. Making training, development and progression opportunities equally available to all employees;
4. Regularly reviewing all employment practices and procedures to ensure fairness;
5. Treating any proven breaches of this policy as misconduct or gross misconduct (dependent upon the severity), which will be subject to the appropriate disciplinary action up to and including dismissal;
6. To endeavor to take positive action where necessary to make sure opportunities are offered on a fair and equal basis;
7. To endeavor to take positive action where necessary to redress any imbalances in the makeup of the workforce where these are considered to be potentially damaging for the organization;
8. To adopting reasonable measures for the protection of the employment of members of staff who are victims of domestic violence.

More.com will take all reasonable steps to ensure that:

1. No employee is treated less favorably than another in relation to their employment/appointment/engagement because of their membership of any protected characteristic group;
2. No job requirement, criterion or practice that has a disproportionate and detrimental effect on one section of the workforce shall be applied unless it can be justified in relation to the specific job;
3. If an applicant or employee has a physical or mental impairment that has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities, then More.com will endeavor to make any reasonable adjustment to prevent the individual being put at a significant disadvantage;

4. Harassment of any type is not tolerated, and where it occurs will be stopped as soon as possible and appropriate disciplinary action may be taken;
5. All allegations of discrimination, harassment or violence shall be duly investigated with fairness and confidentiality;
6. More.com will take all reasonable action to ensure that terms and conditions of employment are not offered on discriminatory grounds and are in accordance with this policy.

Specific Employee Accountabilities

ALL employees have a responsibility to:

1. Treat others with dignity and respect at all times;
2. Ensure that they do not make comments, statements, or behave in a manner that could be discriminatory or in breach of this policy, either inside or outside of the workplace, irrelevant of whether such comments or behavior are deliberately intended to be discriminatory or to harass or exert violence, as defined under the present Policy;
3. Co-operate with measures introduced by More.com that promote equality and diversity and prohibit discrimination, harassment or violence;
4. Not commit any acts or behave in a manner that would contravene the Equality, Diversity & Anti-Harassment policy;
5. Not instruct, induce or attempt to induce or pressurize other employees to act in breach of the Equality, Diversity & Anti-Harassment policy.
6. Advise their Line Management, or if appropriate their Line Managers superior, the Senior Management team or the HR Department, if they become aware of any conduct, either against themselves or against another employee or any third party in a way that contravenes any part of this policy;
7. Be truthful and pro-active when undertaking any actions in the context of the present Policy.

Recruitment

1. No vacancy will be advertised or publicized (internally or externally) in a way that discourages applications from any specific sector of the population, or from any individual with a protected characteristic. In order to ensure that this requirement is met, the advertisement or publication of all vacancies will be administered by the HR Department in accordance with the relevant Recruitment & Selection Policies of the company.
2. All applications will be considered on merit and in accordance with the relevant recruitment & selection policies of the company. Each individual will be assessed so far as practicably possible against a set of objectives, transparent and non-discriminatory criteria which will be directly related to the demands of the particular vacancy. All interviews will be conducted in accordance with the relevant recruitment & selection Policies of the company. Questions asked of a candidate will be related to the selection criteria and will be asked in order to elicit information designed to give a fair assessment of that particular applicants' ability (technical or non-technical) to perform the tasks required by the role.
3. When aware of the need to do so, More.com will endeavor to make reasonable adjustments to its arrangements for interviews and to conditions of employment for disabled applicants

to ensure as far as practicably possible that existing arrangements do not place such applicants at unjustified and significant disadvantage to other applicants.

Offers of Employment

No one sector or group of the population will be deliberately disadvantaged or discriminated against in relation to the terms of employment offered or applied to them.

Training

1. More.com expects all Line Managers to attend relevant training designed to ensure that they are fully aware of their responsibilities regarding this policy and have the requisite knowledge and skills required to enforce the requirements of this policy and incorporate it into their day to day activities and those of their departments.
2. General training for employees will be offered and delivered in a manner that is not in breach of any aspect of this policy. Training courses provided to employees will be provided in order to enhance their skills and capabilities to carry out their current role or to develop their skills and capabilities for future promotion, and will not be withheld from employees sharing particular protected characteristics.

Equal Pay

1. The company will take steps to ensure that levels of pay do not differ significantly between groups with protected characteristics and those without such characteristics. Where there are significant differences between employees with protected characteristics and those without, such differences must be justifiable in relation to the individual employee's ability to carry out their work, their skill set or experience, or factors pertaining to the local labor market.
2. More.com may from time to time monitor and review the pay levels of employees with protected characteristics in comparison to those without such characteristics. Any significant discrepancies will be reported to the Senior Management of the Company by the HR Department, appropriate investigation may be necessary, and corrective actions may be taken to ensure that pay levels have no specific relation to protected characteristics.

Dress Code

1. All employees are expected to adhere to the Dress Code of the company. However, the company recognizes the diversity of cultures, religions, disabilities, and other protected characteristics of its employees and will take a sensitive approach when such matters affect an employee's ability to adhere to the relevant Dress standards and requirements. Employees should address any such concerns with their Line Management as soon as possible.

2. Although headwear is normally prohibited an exception to this rule may be envisaged where specific headwear is required for religious or cultural reasons, provided it does not contradict the applicable laws of the concerned country.
3. Similarly, dress code requirements may be reviewed and reasonably adjusted for employees with disabilities or employees who are pregnant. Any decisions will be at the discretion of management and may necessitate professional occupational health advice. Line Managers should remember that in such circumstances the company may have a legal duty to consider reasonable adjustments for such employees and should seek advice from the HR Department of the company if there is any uncertainty.

Post-Employment/References

1. More.com will not unlawfully discriminate against any individual after their employment has ceased (for whatever reason). All employees are reminded that they are expected to treat former employees in accordance with the spirit of this policy.
2. Requests for references or opinions about former employees must not be made or given to third parties on behalf of More.com under any circumstances, unless made or given by the HR Department of the company. All requests from third parties for information about former employees MUST therefore be forwarded to the respective HR Business Partner. No employee, other than a member of the HR Department is authorized to respond on behalf of the company to any request for information from a third party regarding a former employee or any employee who is working their notice period (i.e. employment reference requests). For clarification, it is More.com company policy to only provide confirmation of dates of employment on ALL reference requests.

Breaches to the Equality, Diversity & Anti-Harassment Policy

1. More.com will not tolerate any form of discrimination, harassment or violence by or of any of its employees. Discrimination and instances of harassment or violence by or of an employee because of a protected characteristic will be treated as a disciplinary offence in accordance with the Disciplinary Policy of the company. Any employee who has breached the Equality, Diversity & Anti-Harassment Policy may be subject to the appropriate disciplinary action up to and including dismissal. Other disciplinary measures may include addressing a recommendation to the employee, change of position of work, the imposition of different working schedule, change of location of work or type of employment.
2. Any employee who receives or witnesses' treatment that they believe to be in breach of this policy must raise such matters as soon as is practicably possible with their Line Manager, a member of Senior Management or the HR Department of the company. This can also be done either as a formal or informal complaint to their Line Manager (or next in Line Manager) or as a formal complaint to the HR Department of the company. Regarding violence or harassment at the workplace, all employees may also submit their complaint or report (anonymously or not) in accordance with More.com's Whistleblowing Policy and the Disciplinary Policy.

3. More.com will take steps to ensure that any employee who has in good faith complained or lodged a grievance according to the above process will not receive less favorable treatment than any other employee. Please also refer to the Whistleblowing Policy of the Company.
4. Any acts or omissions by way of retaliation or intimidation against any employee making a complaint or assisting in a subsequent investigation will result in the alleged perpetrator(s) being subject to the appropriate disciplinary action up to and including dismissal. Similarly, any employee who makes or assists in a complaint or allegation that later can be proven to be wholly unfounded or malicious may be subject to the appropriate disciplinary action.
5. The company may contact the police if they believe that a criminal offense has occurred with regards to discriminatory actions or behavior, harassment and/or violence.
6. For clarification, the HR Department of the company does not require a formal complaint to instigate a disciplinary investigation against an employee (or employees) who is/are suspected (for whatever reason) of breaching this policy. The company has a duty of care to all of its employees and if it is believed that a breach of this policy has taken place, a full investigation will be undertaken. This may involve the suspected perpetrator(s) being suspended with immediate effect pending the outcome of the investigation and subsequent disciplinary process. As part of any such investigation, the HR Department of the company reserve the right to monitor an employee's professional emails, correspondence, work telephone calls, publicly made social media posts or endorsements etc. if they have reason to believe that any form of discrimination has or is taken place.
7. All victims of violent behavior or harassment may seek legal redress against the perpetrator of such acts in accordance with the applicable legal framework. More.com shall endeavour to cooperate with all competent authorities in relevant investigations.