

DIVERSITY, EQUITY AND INCLUSION POLICY

POLICY STATEMENT

1. Archer Daniels Asset Management recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics**).
2. Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.
3. We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.
4. All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.
5. Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.
6. This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies. Archer Daniels Asset Management and all its allied companies have underwritten or shall underwrite the ILPA Diversity in Action initiative as a means of demonstrating our commitment to advancing diversity, equity and inclusion (DEI).

OUR COMMITMENT

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development and progression opportunities are available to all staff.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.

- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management.
- The policy will be monitored and reviewed regularly.

RESPONSIBILITIES OF MANAGEMENT

7. Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that:
 - all their staff are aware of the policy and the arrangements, and the reasons for the policy;
 - grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
 - proper records are maintained.
8. Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

RESPONSIBILITIES OF STAFF

9. Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:
 - comply with the policy and arrangements;
 - not discriminate in their day to day activities or induce others to do so;
 - not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
 - ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
 - inform their manager if they become aware of any discriminatory practice.

THIRD PARTIES

10. Third-party harassment occurs where a Archer Daniels Asset Management employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. Archer Daniels Asset Management will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once that this has occurred. The Company will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

RELATED POLICIES AND ARRANGEMENTS

11. All employment policies and arrangements have a bearing on equality of opportunity. The Company policies will be reviewed regularly and any identified discriminatory elements removed.

RIGHTS OF DISABLED PEOPLE

12. The Company attaches particular importance to the needs of disabled people.
13. Under the terms of this policy, managers are required to:
 - make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice and guidance from external agencies where appropriate to maintain disabled people in employment);
 - include disabled people in training/development programmes;
 - give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

EQUALITY TRAINING

14. A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programmes.
15. Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive training.

MONITORING

16. The Company deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.
17. The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs, grade and length of service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained.
18. There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

19. We will maintain information on staff who have been involved in certain key policies: Disciplinary, Grievance and Bullying & Harassment.
20. Where appropriate **equality impact assessments** will be carried out on the results of monitoring to ascertain the effect of the Company policies and our services / products may have on those who experience them.
21. The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.
22. If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action.

GRIEVANCES/DISCIPLINE

23. Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance or Harassment Procedures.
24. Discrimination and victimisation will be treated as disciplinary offences and they will be dealt with under the Company Disciplinary Procedure.

REVIEW

25. The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of either of the co-managing directors.

