



VANTAGE
INFRASTRUCTURE



DIVERSITY & INCLUSION (EQUAL OPPORTUNITIES) POLICY

December 2021

Contents

1.	PURPOSE	3
2.	SCOPE	3
3.	REVIEW AND COMPLIANCE	3
4.	PRINCIPLES	3
5.	BREACHES	3
6.	COMMITMENTS	4
	APPENDIX 1: DEFINITIONS	5

1. PURPOSE

The purpose of the Vantage Diversity & Inclusion (Equal Opportunities) Policy (the “Policy”) is to set out Vantage’s approach to diversity, inclusion and equal opportunities.

As set out in the Vantage ESG and Sustainable Investment Policy, one of Vantage’s non-negotiable values is that it will not tolerate discrimination and will promote diversity by race, gender, sexual orientation, religion or age.

Vantage is committed to fostering a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way Vantage operates.

Vantage aims to be an inclusive organisation, committed to providing equal opportunities including in the recruitment, training and development of employees, and to proactively tackling and eliminating discrimination.

2. SCOPE

This Policy applies to everyone who works for Vantage in all positions and at all levels, including managers, officers, directors, partners, employees, consultants, contractors, interns and casual and agency staff (collectively referred to as “staff” in this Policy).

The Policy applies to all aspects of Vantage’s working practices, including: recruitment and selection; development, training and promotion; pay, benefits and terms and conditions of employment; health and safety; conduct at work, discipline and grievances; and termination of employment, including redundancy selection.

The principles of non-discrimination and equality of opportunity apply equally to the treatment of prospective and former members of staff, visitors, clients, business partners and suppliers by members of Vantage’s current workforce.

3. REVIEW AND COMPLIANCE

The Policy is subject to the approval of the Vantage Infrastructure Holdings Limited (“VIHL”) Board.

This Policy is subject to review on a biennial basis or as required to ensure that it remains relevant, current and compliant with applicable laws.

Compliance with and oversight of the Policy are the responsibility of the Partner responsible for championing ESG and sustainable investment philosophy, policies and practices.

4. PRINCIPLES

Vantage’s commitment to diversity, inclusion and equal opportunities and, therefore, this Policy are founded on the following core beliefs or principles:

- Promoting diversity, creating an inclusive work environment and eliminating discrimination in all forms is not only the right thing to do from a societal viewpoint but also contributes to the success of Vantage’s business;
- Everyone should be entitled to equal opportunities during recruitment and employment;
- Without an inclusive and non-discriminatory environment, a diverse workforce on its own would constitute a wasted opportunity. An equal opportunities environment is an enabler for both diversity and inclusion; and
- It is the responsibility of *all staff* to promote these principles and ensure that equality and fairness is promoted in the workplace.

5. BREACHES

Any breach of this Policy will be regarded as misconduct and could lead to disciplinary action or, in the case of unlawful behaviour, legal proceedings.

6. COMMITMENTS

Vantage's diversity, inclusion and equal opportunities ethos is designed to attract, develop, and advance the most talented workforce regardless of their race, sexual orientation, religion, age, gender, disability status, background or any other protected characteristic or dimension of diversity, including cognitive.

To promote this ethos, Vantage has identified a series of business commitments:

- To provide equal facilities or treatment on grounds of those characteristics protected by equality law ("protected characteristics") or other dimensions of diversity: age, disability, gender reassignment, marriage or civil partnership (or status thereof), pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion, religious belief or similar philosophical belief, gender, sexual orientation and social background;
- To promote equality and equal opportunities in the workplace;
- To recognise that equality does not mean treating everyone the same but to achieve a 'level playing field' in order to provide an equal opportunity for all staff to succeed;
- To create an environment which allows individuals to bring their "whole self" to work, and in which individual differences (including cognitive) and the contributions of all team members are recognised and valued;
- To help all employees develop their full potential and talents;
- To create a work environment that promotes dignity and respect for all staff;
- To have zero tolerance for any form of discrimination, intimidation, bullying, harassment or victimisation, and to discipline those that breach this Policy;
- To be mindful of, and to eliminate, behaviour which may result in indirect discrimination when applying provision, criterion or practice that appears to affect everyone in the same way, but in fact has an adverse effect on a group of persons;
- To encourage anyone who feels they have been subject to discrimination or harassment to raise their concerns and any such complaint to be taken seriously and dealt with in a confidential and sensitive manner;
- To make training, development and progression opportunities available to all staff; and
- To measure and report to the Vantage Infrastructure Holdings Limited Board our diversity performance on an annual basis.

APPENDIX 1: DEFINITIONS

1. Direct discrimination
 - 1.1. Direct discrimination means treating someone less favourably than an individual/organisation would treat others because of one of the protected characteristics set out above. This includes any less favourable treatment because an individual/organisation perceives a person to have a protected characteristic (even though they do not in fact have it), or because they associate with a person, who has a protected characteristic.
2. Indirect discrimination
 - 2.1. Indirect discrimination means placing someone at a disadvantage by applying provision, criterion or practice that appears to affect everyone in the same way, but in fact has an adverse effect on a group of persons, who share one of the protected characteristics set out above. If a person, who has that characteristic, can show that the provision, criterion or practice puts or would put them at a disadvantage compared to others, the provision, criterion or practice will be indirectly discriminatory unless it is shown to be a proportionate means of achieving a legitimate aim.
3. Harassment
 - 3.1. Harassment related to one of the protected characteristics set out above will be unlawful if it consists of unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, offensive, degrading or humiliating environment for that person. Unwanted conduct of a sexual nature is also unlawful harassment.
4. Victimisation
 - 4.1. Unlawful victimisation is unfavourable treatment of a person because they have taken action to assert their legal rights under equality law or to assist someone else to do so. A false complaint of victimisation will not be protected unless it is made in good faith.
5. Disabled persons
 - 5.1. Disabled persons have additional rights. It is unlawful to subject a disabled person to unfavourable treatment because of something arising from a disability, unless the unfavourable treatment is a proportionate means of achieving a legitimate aim.
 - 5.2. Disabled staff are also entitled to have reasonable adjustments made to any provisions, criteria or practices or physical features of the workplace that put them at a substantial disadvantage compared to staffs who are not disabled, with a view to avoiding that disadvantage.
 - 5.3. If person is or becomes disabled in the course of the employment with a company, such person is requested to tell the company about such condition to enable the company to support the person as much as possible and to discuss with the individual any adjustments that might be of help.