

EQUALITY AND DIVERSITY POLICY

Bunzl plc and its subsidiaries ('Bunzl' or 'the Group')

Policy statement

We believe that the Group's employees are a particularly key part of our success. We are therefore committed to focusing our employment procedures and practices around maximising the potential of each individual. We believe this is best achieved by developing our employees' talents, while recognising their different cultures, perspectives and experiences.

The creation of equity goes beyond simply treating people fairly. By accepting and embracing their diversity, and removing any perceived or real barriers to engagement, we will create an inclusive and positive working environment for all employees, and grow the skills and capabilities we need. We acknowledge that diversity, equity and inclusion are not interchangeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

Bunzl supports the principle of equal opportunity and is opposed to all forms of discrimination on the grounds of sex, race, nationality, ethnic origin, religion and belief, marriage and civil partnership, sexual orientation, gender re-assignment, disability, colour, pregnancy and maternity, citizenship or any other characteristic protected by local regulation. Discrimination on the basis of work pattern (part-time working, fixed term contract, flexible working) which is unjustifiable will also not be tolerated. We encourage our employees to call out discriminatory behaviour whenever they observe it, using the confidential "Speak Up" process if necessary.

These principles apply to our recruitment, development, promotion, reward management and communication processes, in addition to all terms and conditions of employment. We seek to develop a work environment where we treat all employees as individuals, fairly and in a consistent way. We will endeavour to remove unnecessary real or perceived barriers for our employees seeking opportunities through training and development, role moves and career planning.

We believe that the creation of an inclusive working environment is a leadership accountability. We will continue to support our directors and managers in demonstrating the principles of diversity, equity and inclusion in their everyday activities, roles and functions, providing whatever training is necessary.

We are guided by our aim to deliver a competitive and fair employment environment and the opportunity to develop and advance subject to personal performance and business opportunity. To this end all Bunzl companies have developed and implemented policies and procedures in line with the UN Universal Declaration of Human Rights and local legislative requirements.

Beyond the adherence with legislative requirements, we recognise that a truly inclusive culture is critical to the attraction, retention and development of those skills and capabilities required to deliver future success for the Group. Therefore, we have set clear objectives around

listening to our employees, building networks, educating our leaders, providing mentoring to under-represented groups, and celebrating diversity through an effective programme of global and local communications.

Recruitment

We aim to appoint the best person for the job. All appointments should be based on merit, individual capability and job based objective criteria. This requires the implementation of fair and effective recruitment practices that comply with the principle of equal opportunity and deliver a workforce with the necessary skills, expertise and qualifications to achieve the Group's objectives and make a positive contribution to the values and aims of Bunzl.

Development

We encourage employees to develop and manage their own careers. We facilitate this by providing appropriate job training and aiming to fill vacancies with existing staff where employees are suitably qualified and experienced. Employees may also be required to participate in training and development activities from time to time in order to encourage the promotion of the principles of this policy.

Promotion

We seek to recruit the right people who are passionate about our business and provide opportunities for people to progress within the organisation on the basis of their skills, experience and aptitude. Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

Reward management

We aim to attract, motivate, retain and develop high calibre staff by rewarding them with competitive salary and benefit packages which are linked both to individual and business performance as well as the external employment market.

Communication

We believe in communicating with employees to ensure they have an understanding of the Group's aims, to understand fully the impact business decisions have on employees and to obtain feedback and ideas from employees for improving the operation of the business.

During employment

Outstanding business performance is dependent on individuals and teams having a clear understanding of what is expected of them and the skills and abilities required to achieve their goals. It is essential that employees are treated in an equitable, consistent and respectful manner at all stages of their career with Bunzl including when they leave. Our approach to managing any organisational restructuring is characterised by detailed planning, involvement of those affected as appropriate and, where job losses are unavoidable, seeking alternative opportunities to minimise the personal impact as far as possible.

The benefits, terms and conditions of employment and facilities available to our employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or underrepresented groups.

This policy is for guidance only and does not form part of an employee's contract of employment.

Employees' expectations and responsibilities

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in Bunzl. Selection for employment, promotion, training or any other benefit will be on the basis of skills, experience and aptitude.

No form of intimidation, bullying or harassment will be tolerated. If employees consider that they, or their colleagues, have been the subject of unlawful discrimination or are subject to harassment in the workplace, they should raise the issue either informally with their manager3 or in more serious cases through any existing grievance procedures.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. Bunzl will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably by Bunzl as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under the relevant disciplinary procedure.

Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning that they can be sued by the victim.

Employees have personal responsibility for the application of this policy. As part of their induction, employees are expected to read and familiarise themselves with this policy, ensure that this policy is properly observed and fully complied with. We expect all employees to respect the right to work in an environment free from prejudice and discrimination, exhibiting the correct behaviours and challenging colleagues who fall short of these expectations.

Application of the policy

Businesses should develop and implement local HR policies and procedures that support and demonstrate the principles of the global equality and diversity policy. In particular, they should ensure that:

- All recruitment documentation (advertisements, interview templates, job descriptions, assessment tests etc.) reflect the equality and diversity policy and are non-discriminatory. As far as possible, all hiring managers are trained in avoiding unconscious bias.
- The HR policies on harassment, discrimination and physical or verbal abuse are visible and accessible to all employees.
- All employees have access to confidential means of reporting any form of unfair treatment, and the "Speak Up" process shall be clearly signposted in all locations.
- Regular reviews (including equal pay audits, analysis of performance ratings, promotion decisions) are conducted to ensure that no discrimination is taking place, whether conscious or unconscious.
- All staff complete the corporate responsibility training modules on employee matters at least once every three years and maintain records of completion of such training.

Businesses should report specified HR data (such as age and gender mix) in the Group reporting system (BRMS).

Policy ownership and monitoring

This policy is owned by the Director of Group HR. The Group HR function will review this and all related policies, which may be amended from time to time, on an ongoing basis, as well as monitor employment practices, to ensure their continued effectiveness. Examples of actions to be undertaken include the regular review and analysis of:

- HR data such as age or gender mix;
- · formal grievances to identify any trends in issues which might be discriminatory; and
- the relativities of roles within the organisation to ensure that base salaries are equitable, that any differences can be explained and no unconscious biases have developed within the organisation.
- Measuring progress against the broader Diversity, Equity and Inclusion objectives

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