



**Group Human Resources / All Divisions /
Department**

Equal Opportunities, Anti-Discrimination and Anti-Harassment Policy

**The DS Smith Group is committed to promoting
equal opportunities in employment and
preventing discrimination and harassment.**



Table of Contents

Topic	Page Number
Equal Opportunities, Anti-Discrimination and Anti-Harassment Policy Statement	3
<u>About this Policy</u>	4
<u>Who is responsible for this Policy?</u>	4
<u>Diversity, Equity and Inclusion within Now & Next Sustainability Strategy</u>	4-5
<u>Discrimination</u>	5
<u>Disabilities</u>	5-6
<u>Harassment</u>	6
<u>Other Equal Opportunity Commitments</u>	7
<u>Recruitment and Selection</u>	7
<u>Equal Opportunity during Employment</u>	7
<u>Equal Opportunity Monitoring</u>	7-8
<u>Breaches of this Policy</u>	8
<u>Victimisation</u>	8
<u>Questions and Information</u>	8-9
<u>Key Related Documents</u>	9
<u>Document Change Record</u>	9



Equal Opportunities, Anti-Discrimination and Anti-Harassment Policy Statement

The DS Smith Group is committed to promoting equal opportunities in employment. Job applicants, employees and contingent workers will not be discriminated against on any grounds including age, disability, race, religion or belief, sex, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity or any other characteristic protected by local law ("Protected Characteristics").

The DS Smith Group is also committed to providing an inclusive work environment where all individuals feel welcomed, respected, and valued. We have a zero-tolerance approach to discrimination, as well as harassment.

All DS Smith Group employees and contingent workers should actively promote an inclusive workplace environment through their conduct. The cumulative behaviours and daily workplace interactions among all individuals create and uphold the DS Smith Group's culture of inclusion.

This document sets out the approach to equal opportunities and the avoidance of discrimination at work within the DS Smith Group, and the processes in place to be followed in the event of an actual or suspected breach. The policy can be found on Plexus or via hard copy on site.

If you find conduct in the workplace to be unwelcome or offensive or a violation of this policy, you should inform the person engaging in the conduct that you want the conduct to stop. However, if you are uncomfortable taking this action (or even if you have taken this action), you should report it to your manager or to Human Resources or use the "Speak Up!" process so the Group can investigate and take appropriate remedial measures to end any conduct that violates this policy.

The DS Smith Group takes a strict approach to discrimination; you are required to comply with this policy at all times and without exception.



1. About this Policy

- 1.1** This policy covers all job applicants, employees and contingent workers within the DS Smith Group. For the purposes of this policy, 'contingent workers' is a collective term for all individuals who are providing services to the company that are not DS Smith employees and includes the self-employed, contractors, agency workers, volunteers and trainees.
- 1.2** This policy is intended to comply with all applicable local law requirements in the jurisdictions in which DS Smith operates. Local law will prevail in case of any conflict with the terms of this policy. To the extent that there are any policies in your local jurisdiction that provide additional rights, obligations, and/or responsibilities, you must follow those policies as well.
- 1.3** This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.4** The DS Smith Group is committed to reviewing this policy at regular intervals, monitoring its effectiveness and implementing any changes that may be required.
- 1.5** If you have any questions or are unsure whether any decisions or circumstances could be a breach of this policy, you should contact the Human Resources Team.

2. Who is responsible for this Policy?

- 2.1** The Group Operational Committee (GOC) has overall responsibility for the effective and equitable operation of this policy and for ensuring compliance with discrimination laws.
- 2.2** The Human Resources Team has responsibility for the implementation and management of this policy and ensuring compliance with discrimination laws.
- 2.3** All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage understand and adhere to the policy and promote our aims and objectives with regard to equal opportunities and the prevention of discrimination.
- 2.4** All employees and contingent workers are responsible for adhering to this policy.
- 2.5** Appropriate and regular training will be provided to equip employees and managers in fulfilling and exceeding this expectation.
 - a)** To reinforce comprehension of the requirements outlined in this policy, all employees and contingent workers with access to the DS Smith Group's Learning Management System should complete a training course.
 - b)** For employees without access to digital learning platforms, equivalent training materials will be made available through their respective Human Resources Team.

3. Diversity, Equity and Inclusion within Now & Next Sustainability Strategy

- 3.1** Adherence to this policy supports the DS Smith Group's Diversity, Equity and Inclusion ambitions outlined in the People & Communities pillar of the Now & Next Sustainability Strategy.
- 3.2** The DS Smith Group's Sustainability Strategy establishes the organisation's commitment to fostering a safe, diverse, and inclusive workplace, as well as actively engaging with local communities. As part of this strategy, the DS Smith Group provides inclusive leadership training

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and actively supports the employee-led active networks.

- 3.3** The DS Smith Group’s Sustainability Strategy also delineates the organisation's commitment to increasing diversity across its workforce. Strict compliance to the Equal Opportunities, Anti-Discrimination and Anti-Harassment Policy is therefore critical to realising these diversity objectives.

4. Discrimination

- 4.1** Discrimination can occur when making hiring, promotion, termination, compensation and any other employment decisions not on individual merit but based on a “Protected Characteristic” (as described in the Policy Statement).
- 4.2** You must not unlawfully discriminate against or harass current or former employees, contingent workers or others, including, but not limited to job applicants, clients, customers, suppliers and visitors. Discrimination, whether between peers of equal standing or involving power disparities such as manager-to-subordinate relationships, is strictly forbidden and will not be tolerated. This is applicable in the workplace, outside the workplace, when dealing with customers, suppliers or other work-related contacts, when wearing a uniform and on work-related trips or events including social events. You should not engage in any form of discrimination when using internet-based technologies, applications, and digital communication channels.
- 4.3** There are a number of different forms of discrimination that you should be familiar with. While terminology for different forms of discrimination may vary across geographic regions and legal jurisdictions, the following constitutes a broad set of categories and examples of each:
- a) Direct discrimination:** this is the most obvious form of discrimination, where someone is treated less favourably because of a Protected Characteristic.
 - b) Indirect discrimination:** this form of discrimination is less obvious, involving a provision, criterion or practice that applies to everyone but adversely affects people with particular Protected Characteristics more than others, and is not justified and proportionate to achieving the legitimate aim at stake.
 - c) Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments or accommodations to alleviate disadvantages caused by a disability.
 - d) Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
 - e) Victimization:** retaliation against someone who has complained or has supported someone else’s complaint about discrimination or harassment.

5. Disabilities

- 5.1** This policy recognises that disabilities can encompass both visible and non-visible conditions. If you are disabled or become disabled, we encourage you to communicate this with us so that we can support you as appropriate. This information will, of course, be treated confidentially and in line with data protection legislation and the Group Data Protection Policy.



- 5.2** If you experience difficulties at work because of your disability, you should contact your line manager or the Human Resources Team to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We will consider the matter carefully and try to accommodate your needs in compliance with applicable laws.
- 5.3** We will, in accordance with applicable laws, ensure that our premises are suitable for use by individuals with disabilities. We will also regularly monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

6. Harassment

- 6.1** Harassment can take different forms and may be of a verbal, written, visual, or physical nature. Some examples of what might be considered harassment, depending on the facts and circumstances, include but are not limited to, the following:
- a) Verbal, Written, or Visual Harassment:** Unwelcome or derogatory comments regarding Protected Characteristics, threats of physical harm, inappropriate gestures, or the distribution, including by e-mail or other electronic media, or display in any work area, of written or graphic material negatively portraying such Protected Characteristics.
 - b) Physical Harassment:** Hitting, pushing, or other aggressive physical contact, touching or threats to take such action or impeding or blocking movements.
 - c) Sexual Harassment:** Unwelcome sexual conduct, whether verbal, visual, or physical, including, among other things, sexual advances; demands or unwelcome pressure for sexual favours; making or threatening reprisals after a negative response to sexual advances; making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an individual's body or style of dress; leering; making sexual gestures; displaying sexually suggestive objects; physical touching; or other unwelcome verbal, visual, or physical conduct of a sexual nature, whether or not it was designed or intended to promote an intimate relationship. Sexual harassment is unlawful and will not be tolerated. We take steps to prevent sexual harassment in the workplace, including but not limited to monitoring of reported incidents and providing training. We also take breaches of this policy very seriously. Further information on breaches of this policy can be found in section 11.
 - d) Bullying:** Bullying conduct, which in some jurisdictions is also referred to as mobbing, is an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone. Examples of bullying include but are not limited to spreading malicious rumours about someone, constantly putting someone down in meetings, or unfairly excluding someone from team social events. Bullying undermines the inclusive workplace culture that the DS Smith Group aims to uphold and will not be tolerated. You should refrain from any intimidating, degrading, or hostile actions.
 - e) Third-party harassment:** Third-party harassment occurs where the perpetrator is from outside the organisation. This includes, for example, harassment by suppliers, contractors or customers. We will not tolerate sexual harassment of our employees by third parties or any other form of third-party harassment and will take steps to protect our employees. We encourage employees to report third-party harassment and provide training on how to do this. If third-party harassment occurs, we may take steps such as banning individuals from our premises, reporting any criminal acts to the police and/or sharing relevant information with other parts of the business.



7. Other Equal Opportunity Commitments

- 7.1** The DS Smith Group is committed to cultivating an inclusive environment embracing all forms of diversity. This policy promotes respect and belonging for all, including those with qualities beyond legally protected characteristics. The commitment extends beyond legal mandates to create a culture of acceptance for all people.
- 7.2** The DS Smith Group encourages employee-led active networks (see 3.2) to identify opportunities to reinforce its commitment to an inclusive workplace. These may include updating people processes, developing external partnerships with community organisations, or supporting social causes aligned with the Group's diversity, equity, and inclusion values.
- 7.3** Employees should notify Human Resources of any potential commitments, initiatives, or partnerships that could further cultivate an environment of belonging and respect. Human Resources will evaluate these proposals and determine appropriate avenues for participating in efforts that substantiate the Group's commitment to inclusion.

8. Recruitment and Selection

- 8.1** The DS Smith Group will take all reasonable steps to eliminate discrimination from internal and external recruitment and selection. For more detail, please refer to the DS Smith Group Recruitment Policy.
- 8.2** Job specifications should be designed to avoid directly or indirectly discriminating positively or negatively and will be proactively advertised to encourage as diverse an applicant pool as possible. Every stage of the selection process should be designed and conducted to eliminate potential discrimination.
- 8.3** Job applicants should not be asked about anything that may suggest an intention to discriminate on the grounds of a Protected Characteristic.
- 8.4** When checking whether employees are entitled to work in their relevant jurisdiction, assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce documents to demonstrate the right to work (e.g. passport) to satisfy immigration requirements. The Human Resources Team can provide a list of acceptable documents.

9. Equal Opportunity during Employment

- 9.1** This policy applies to all aspects of employment as well as recruitment, including remuneration, working pattern, training, appraisals, career development and progression opportunity, conduct at work, disciplinary and grievance procedures, and termination of employment.

10. Equal Opportunity Monitoring

- 10.1** To ensure that this policy is operating effectively, to identify groups that may be underrepresented or disadvantaged in the DS Smith workplace, we may monitor Protected Characteristics of applicants and existing staff, in accordance with local law and the Group Data Protection Policy.
- 10.2** Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment.



10.3 Analysing this data helps us take appropriate steps to actively progress equality and inclusion in the organisation.

11. Breaches of this Policy

11.1 If you experience or observe or are made aware of behaviour in the workplace that is in violation of the minimum expectations of conduct detailed in this policy, we recommend the following:

11.1.1 Inform the person engaging in the conduct in a clear, concise, and unambiguous manner that the conduct is unwelcome or offensive and that you want it to stop.

11.1.2 However, if you are uncomfortable taking this action (or even if you have taken this action), speak to your manager or the Human Resources Team (select the person with whom you feel most comfortable discussing the situation) or report it via the channels outlined in our "Speak Up!" Policy.

11.2 We expect anyone who is aware of conduct inconsistent with, or in violation of, this policy to speak immediately to their line manager, Human Resources, or via our "Speak Up!" channels.

11.3 The DS Smith Group takes a strict approach to breaches of this policy, which will be investigated thoroughly and dealt with in accordance with the relevant disciplinary procedures and applicable law. This may include disciplinary action up to and including termination of employment. Aggravating factors, such as abuse of power over a more junior colleague, will be taken into account when deciding what disciplinary action to take.

11.4 No action will be taken against any employee, contingent worker or any supporting colleague or relative for making an allegation under this policy in good faith, with reasonable grounds to believe the information on breaches reported was true at the time of reporting, even if the allegations are not validated by the subsequent investigation. However, malicious or unfounded allegations may result in disciplinary action.

11.5 We may discipline an employee for any inappropriate conduct discovered while investigating reports of alleged violations of this policy, even if the conduct does not amount to a violation of the law, subject to all local law requirements.

11.6 If the person who engaged in the unwelcome or offensive conduct is not employed by the DS Smith Group, we will take whatever corrective action is reasonable and appropriate under the circumstances. This may include discontinuing the relationship with a third party.

12. Victimisation

12.1 The DS Smith Group will not tolerate any retaliation against anyone for cooperating in an investigation, for making a truthful and good faith complaint of a violation of this policy, for opposing perceived violations of this policy, for filing an administrative or legal claim, or for participating in any investigation, proceeding, or hearing conducted by the DS Smith Group or a government authority, even if the allegations are not substantiated by the DS Smith Group's or the authority's investigation (unless such allegations are found to be untrue and clearly unjustified). Anyone who believes that they have experienced or witnessed any conduct which they believe to be retaliatory in nature should follow the reporting procedures described above and in accordance with local law requirements.

13. Questions and Information

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13.1 If you have any questions concerning this policy, please contact the Human Resources Team.

14. Key Related Documents

Ref Number	Title
	DS Smith Group Recruitment Policy
	DS Smith "Speak Up!" Policy
	DS Smith Modern Slavery Policy
	DS Smith Social Media Policy

15. Document Change Record

Version:	Date:	Change Description:	Author:	Approver:
2	2024	Review and update		