



Diversity Policy

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VGP Diversity Policy

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The VGP Group policy on preventing any forms of discrimination, sexual harassment and on promoting diversity and equal pay.

The VGP Code of Conduct describes the key principles of conduct for the business environment, in which the Group operates, including a **prohibition of discrimination and harassment** and a commitment to foster **diversity** in our organisation. This Policy sets out further details.

VGP is committed to providing a safe, flexible and respectful environment for its team members free from all forms of discrimination and harassment.

All team members are required to treat others with dignity, courtesy and respect.

By effectively implementing our Diversity Policy we will attract and retain talent and create a positive working environment.

WHO IS SUBJECT TO THIS POLICY?

All VGP team members and all VGP entities. Suppliers of services to VGP are subject to this policy to the extent that it is included in the respective contract.

DISCRIMINATION

Discrimination is treating, or proposing to treat, someone unfavourably because of a personal characteristic protected by the law, such as sex, age, race or disability.

Discrimination is prohibited mainly in employment context.

VGP management is required to ensure that

- recruitment decisions are based on merit and that no discriminatory requests for information are made in recruitment processes
- seriously consider requests for flexible work arrangements in order not to limit the ability of specific classes of workers to perform their jobs.

Discrimination can occur directly, but also indirectly. Also indirect discrimination is unlawful.

Direct discrimination occurs, when a person is treated less favourably than another person in a similar situation because of a personal characteristic protected by law. For example, a candidate is not accepted because of her race.

Indirect discrimination occurs, when a supposedly neutral, but unreasonable measure has the actual effect of disadvantaging people with a personal characteristic protected by law. For example, a requirement that employees work on certain days including religious holidays may in fact discriminate based on religion.

Even if the person does not in fact has the respective personal characteristic, but discrimination occurs on this basis, it may be unlawful.

Valuing the contribution that every individual can make to our enterprise, VGP strives to provide persons belonging to the protected groups (disability, women) reasonable adjustments to facilitate their recruitment and the performance of job for VGP.





EQUAL PAY

VGP ensures equal pay for equal work. That means that no distinction can be made in remuneration based on any of the personal characteristics listed above, including gender.

VGP makes reasonable effort to monitor the implementation of the equal pay policy across the group.

DIVERSITY

VGP values diversity in the workplace. For this purpose, VGP strives to enable recruitment of members of disadvantaged groups to the positions that are not usually occupied by these.

HARRASMENT AND BULLYING

All VGP team members are strictly required to avoid any instances of sexual harassment and/or bullying and to report any such instance.

Sexual harassment can take the form of unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature ... when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. It can include:

- comments about a person's private life or the way they look; unauthorized touching or hugging; sexually suggestive comments or jokes;
- displaying offensive screen savers, photos, calendars or objects;
- behaviour that may also be considered to be an offence under criminal law, such as physical assault, gender-based violence, indecent exposure, sexual assault, stalking or obscene communications.

Just because someone does not object to inappropriate behaviour in the workplace at the time, it does not mean that they are consenting to the behaviour.

Sexual harassment occurs in the workplace when it happens at work, at work-related events or between colleagues outside of work. A single incident is enough to constitute sexual harassment – it doesn't have to be repeated.

Bullying can take many forms, including inappropriate jokes, teasing, nicknames, emails, pictures, text messages, social isolation or ignoring people, or unfair work practices, in particular, if this is based on any of the protected classifications listed above.

Constant unconstructive criticism, deliberately withholding information or equipment that a person needs to do their job or access their entitlements or unreasonable refusal of requests for leave, training or other workplace benefits can represent instances of bullying.

Any form of sexual harassment, gender-based violence or bullying is unacceptable, in the workplace, in work-related context or on business trips. All VGP team members are responsible for their behavior. VGP shall respond to all incidents of such behavior – no matter how large or small or who is involved – quickly and appropriately.

REPORTING A CONCERN

VGP strongly encourages any team member who believes they have been discriminated against, bullied or sexually harassed to make appropriate complaint in accordance with the reporting a concern section of the **Code of Conduct**.

Any team member who has witnessed any discrimination, bullying or sexual harassment should report this to their manager or other responsible person in the Company, or can report his concern to the **VGP Compliance Hotline***.

FINAL PROVISIONS

In so far as this policy imposes any obligations on VGP entities, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

VGP may unilaterally introduce, vary, remove or replace this policy at any time.

FURTHER RESOURCES

This policy is based on various local and international legislation and enactments. This policy does not supersede any of such binding laws and, where stricter or otherwise differing rules apply by virtue of such legislation, those shall be followed.

The following policies are applicable. Through the link, resources can be further reviewed:

→ local anti-discrimination, equal pay and equal opportunity as well as anti-harassment and work-place safety legislation

→ [Directive 2000/43/EC](#)
against discrimination on grounds of race and ethnic origin

→ [Directive 2000/78/EC](#)
against discrimination at work on grounds of religion or belief, disability, age or sexual orientation

→ [Directive 2006/54/EC](#)
equal treatment for men and women in matters of employment and occupation.

→ [Directive 2004/113/EC](#)
equal treatment for men and women in the access to and supply of goods

→ [the 1998 International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)

→ [the ILO Discrimination \(in Employment and Occupation\) Convention, 1958 \(No. 111\)](#)

→ [the ILO Equal Remuneration Convention, 1951 \(No. 100\)](#)



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* VGP Compliance Hotline:
<https://vgp.speakup.report/en-GB/compliance/home>

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