

RESTITUTION POLICY AND CODE OF CONDUCT ON DIVERSITY, EQUITY AND INCLUSION AND PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE

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| Date updated: | 28 March 2024 |
| Person responsible: | Legal Director |

Introduction

Background

Our objective is to create an environment which embraces difference and fosters inclusion. We believe that doing so is a competitive differentiator which enables us to achieve our vision to create unmatched value for our [investors and partners].

Our commitment to diversity, equity, and inclusion includes recruiting and retaining employees from diverse backgrounds and experiences, creating awareness of diversity issues and benefits, and fostering a supportive environment where inclusivity is expected and prioritized. We seek to promote a culture that empowers our employees and that fosters values of respect, inclusion, and belonging across the organisation.

This policy sets out how we do so and our expectations in this regard.

We recognize that sexual exploitation and abuse (SEA) violates universally recognized international legal norms and standards and we are committed to preventing SEA and promoting protection from SEA in all our activities and engagements.

Scope

This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

Responsibility

The boards of directors of Restitution Impact and Restitution Capital (the **Boards**) have overall responsibility for the effective operation of this policy and code of Conduct but has delegated responsibility for overseeing its implementation to the Legal Director.

Amendments

Any suggested changes to this policy should be reported to the Head of Compliance.

Effect

The policy does not form part of any contract of employment or other contract to provide services and Restitution Impact may amend it at any time.

Section One: Diversity, Equity and Inclusion

Diversity, equity, and inclusion are among Restitution Impact's core values. Our goal is to provide a working environment where all employees are included and valued for their contributions [and to reflect the diversity of the stakeholders for whom we work]. This document sets out our policy in relation to diversity, equity, and inclusion and guides the Boards, management, employees, and partners in developing an inclusive culture.

Creating an inclusive and equitable organization is vital to ensuring that the diverse perspectives of our employees are valued, respected, and considered. To that end, we embrace and support our employees' differences in age, ethnicity, gender, gender identity or expression, language, nationality or national origin, family or marital status, physical, mental and development abilities, race, religion or belief, sexual orientation, social or economic class, education, political affiliation, and other characteristics that make our employees unique. Doing so also allows us to better serve the interests of our investors, and partners.

Our commitment to diversity, equity and inclusion extends to all areas of our business including recruitment, job assignment, compensation and benefits, talent development, skills enhancement, promotions, employee retention, flexible work arrangements, forms of leave available to employees, policies and procedures, Board appointments, and succession planning.

We recognise that diversity, equity, and inclusion are not mutually exclusive, and that the success of one is dependent on the others:

- **Diversity:** Diversity encompasses the varying experiences, strengths, skills, perspectives, personal characteristics, cultures, and backgrounds represented by and within Restitution Impact.
- **Equity:** A commitment to equity means that we strive to create an environment where everyone has the opportunity and access to realize their full potential, and that no-one is disadvantaged because of their group identity or other socially determined circumstance.
- **Inclusion:** The act of inclusion embraces and celebrates the perspectives, voices, values, and needs of each individual with the goal of embracing a culture where all feel heard, respected, valued, and included.

Our commitment to diversity and inclusion ensures that:

- Diversity is recognised as a key business interest, for every part of the organisation is responsible.
- Communication is respectful between all employees regardless of title or level.
- Insights of diverse groups are sought and welcomed; employees are not alienated or excluded because they don't fit into a set of cultural norms.
- An environment where employees feel that their background and lifestyle do not affect perceptions of them as a professional, or affect their opportunities for development and promotion.
- Flexible working practices are available where appropriate, as there is an appreciation that not everyone can and will work the same hours or in the same way. This removes disadvantage and discrimination to participation in work.

- The diversity of our workforce is visible at every part of the organization.
- Employees are aware of their own unconscious and conscious bias and know how to ensure this does not manifest itself at work.

Our Anti-harassment and Bullying Policy exists to ensure equitable access to grievance procedures in cases of harassment or behaviours that undermine the objectives and scope outlined earlier in this policy.

Section Two: Equal Opportunities

Restitution Impact is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

Candidacy for employment or advancement is based solely on the relevant qualities the candidate would bring to the job position. Equal opportunity extends to all aspects of the employment relationship, including but not limited to hiring, promotions, training and development, working conditions, compensation and benefits. All such decisions are made by using objective standards based on the individual's qualifications as they relate to the particular job.

This section sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** Treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- **Indirect discrimination:** A provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- **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. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

- **Victimisation:** Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- **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 to alleviate disadvantages caused by a disability.

Recruitment and selection

Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

Sexual Misconduct

We recognise that sexual exploitation and abuse (SEA) violate universally recognized international legal norms and standards. We maintain and regularly review:

- a) **Accountability processes** integrated throughout the Organization, including roles and responsibilities to ensure monitoring of, and compliance with, the CoC;
- b) **A mechanism** for anonymous and confidential reporting and, fair and confidential investigative procedures to respond to all allegations of SEA;
- c) **Training** on prevention of SEA and remedial measures when misconduct is found;
- d) **Measures** including disciplinary action in cases of serious misconduct.

We share this code with all Personnel, and third parties we work with, and promote protection from SEA and, where appropriate we require that third parties either: sign an attestation stating they shall respect this policy, or adopt their own policies and procedures to prevent SEA that are in keeping with the goals and objectives of this policy.

For these purpose, the following definitions apply:

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse.

Protection from sexual exploitation and abuse (PSEA): The term used by the United Nations and non-governmental community to refer to measures taken to protect vulnerable people from SEA by their own staff and associated personnel.

Part-time and fixed-term work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.