# **Tritax EuroBox plc**

(the "Company")

# **Board Diversity and Inclusion Policy**

(the "Policy")

(Adopted by the Board on 2 September 2019 and updated on 3 October 2023)

## 1.1 Introduction

The Company is committed to providing a Board environment that is inclusive, respectful and free from discrimination.

## 1.2 Scope

The Company does not have any employees and therefore this Policy relates only to the Board of Directors and applies to all aspects of service, including the advertisement of a position, recruitment, appointments, conduct, training, pay, disciplinary and grievance procedures and termination of service.

#### 1.3 Statement

In keeping with the Company's strategy, the Company supports the principle of equal opportunities in respect of appointments to the Board and opposes all forms of unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic or national origin, sex, age, disability, religion, belief, marital status, socio-economic background or sexual orientation. It is in the Company's best interest to ensure that the human resources, talents and skills available throughout the community are considered when appointment opportunities to the Board arise.

The Company considers that each candidate should be appointed on merit to ensure that the best candidate for the role is appointed every time. What is important to us is professional achievement and the ability to be a successful Director based on an individual's skill set and experience.

Every possible step will be taken to ensure that individuals are treated fairly and that decisions on recruitment, selection and training are based solely on job related criteria. The Board and Nomination Committee will ensure that all recruitment is taken in line with this Policy and best market practice.

The Board places great emphasis on ensuring that its own membership reflects diversity in its broadest sense. The Board intends to use all reasonable endeavours to comply with the Diversity Targets. The Company will include a statement in its annual report confirming whether such Diversity Targets are achieved and, if not, will provide an explanation as to why such Diversity Targets have not been achieved.

Furthermore, the Board supports the recommendations set out in the FTSE Women Leaders Review (which follows the Hampton-Alexander Review) in respect of gender diversity and the Parker Review in respect of ethnic diversity. The Board and the Nomination Committee intend to use all reasonable endeavours to comply with the voluntary targets as set out in the FTSE Women Leaders Review and the Parker Review.

#### 1.4 Definitions

#### **Protected Characteristics**

Grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, colour, ethnic or national origin, religion or belief, gender, sexual orientation.

#### Religion or Belief

Any religion, religious belief or similar philosophical belief.

#### **Equality**

Is about creating a fairer society where everyone has the opportunity to fulfil their potential.

#### **Diversity**

Is about recognising and valuing difference in its broadest sense. Inclusion is about an individual's experience within the workplace, wider society and the extent to which they feel valued and included.

## **Diversity Targets**

- At least 40% of individuals on the Board to be women
- At least one of the Senior Positions on the Board to be held by a woman
- At least one individual on the Board to be from a minority ethnic background (as
  defined by the Office for National Statistics ("ONS") excluding those listed by the
  ONS as coming from a white ethnic background)

#### Senior Positions on the Board

Any of the Chair or Senior Independent Director. Due to the Company being externally managed and governed by the AIC Code, it does not have a Chief Executive Officer or Chief Financial Officer role on the Board and therefore these positions are not relevant to the Company.

## 1.5 Roles and responsibilities

## The Investment Manager ("Tritax Management LLP")

The Investment Manager maintains its own Diversity and Inclusion Policy as part of the Staff Employee Handbook, which is available upon request and which employees of the Investment Manager are required to adhere to.

In summary, employees of the Investment Manager will:

- treat people with dignity and respect
- be aware of their responsibilities, report inappropriate behaviour(s), and raise any incident(s) that breach this Policy
- familiarise themselves with this Policy and procedure, ensuring that their practices are consistent with its contents and relevant legislation
- champion equality, diversity and inclusion in the workplace
- be aware of their personal liability under the Equality Act 2010

### Board of Directors

The Company's Board of Directors has overall responsibility for the operation of this Policy and for ensuring and promoting compliance with current discrimination law. Day to day operational responsibility has been delegated to the Investment Manager.

The Company and its Directors place great emphasis on maintaining procedures which are free from all forms of discrimination. Policies, procedures and practices will be regularly

monitored in light of this Policy and any necessary amendments made to ensure its aims are achieved.

## 1.6 Equal Opportunities

All Directors shall receive equal treatment regardless of any Protected Characteristics (defined above).

#### **Discrimination**

An individual must not unlawfully discriminate against or harass others, including other Directors, 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).

Discrimination can be generally defined as less favourable treatment because of a Protected Characteristic (defined above) - this also covers less favourable treatment because of an association with someone with a Protected Characteristic or an incorrect belief that someone has a Protected Characteristic.

Discrimination can take many forms and it may occur intentionally or unintentionally:

## <u>Direct discrimination:</u>

Occurs when someone is treated less favourably than others because of a Protected Characteristic that is protected by law. An example would be to refuse to appoint someone to a particular role simply because of his or her nationality.

## <u>Indirect Discrimination:</u>

Occurs when applying a provision, criterion or practice which although applies to everyone adversely affects people with a particular Protected Characteristic more than others and is not justified. An example would be making a rule about uniform which would disadvantage those from a certain racial or ethnic group and for which there was no justification.

## Harassment and Bullying:

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.

### Victimisation:

Occurs when an individual is treated less favourably because he/she has complained or given information relating to discrimination or harassment, taken action to assert their legal rights under discrimination legislation or has assisted a colleague to do so.

#### Disability discrimination:

In addition to the usual forms of discrimination, this includes any unjustified less favourable treatment because of the effects of a disability (for example poor attendance), and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

## Associative Discrimination:

Where a person is treated less favourably because of their association with a person who has a Protected Characteristic. An example includes an individual being subjected to harassment on the basis that his/her partner is undergoing gender reassignment surgery.

## Perceptive Discrimination:

Where a person is treated less favourably because they are perceived as having a Protected Characteristic. An example is where a person has a Spanish accent and another person taunts them because of this. Even though the person may have in fact been born in England this may be race discrimination as the person has been harassed because of their nationality.

It is possible to discriminate against a person because of more than one Protected Characteristic. For example, discrimination can take place in relation to the same person because of their race, sex and religion.

## 1.7 Customers / Clients

This Policy applies equally to the treatment of the Company's customers/clients. In promoting equality of opportunity, the Company fulfils its social responsibilities towards the communities in which it operates.

#### 1.8 Recruitment and selection

All reasonable endeavours will be made to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection and training are based on merit against reasonable and objective criteria.

#### 1.9 Disability

In the event that an individual is or becomes disabled during their service and/ or unable to perform their role, they are encouraged to tell the Company about their condition so that the Company can support them as appropriate.

## 1.10 Breaches of this Policy

Any individual who wishes to complain about discriminatory conduct should in the first instance contact the Chairman; the SID; or the Company Secretary, as appropriate. Individuals should feel able to raise such complaints and seek support.

Complaints will be treated in confidence where possible and investigated as appropriate. No individual will be penalised or face disciplinary action for raising concerns in good faith. There must be no victimisation or retaliation against individuals who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Disciplinary Procedure.

Individuals should also be aware that they can be held personally liable for any act of unlawful discrimination or harassment.

A person found to have breached this Policy may be subject to disciplinary action, which could include summary dismissal.