

1 INTRODUCTION

- 1.1 The purpose of this Equality, Diversity & Inclusion Policy (the "**Policy**") is to set out the commitment of Trojan Energy Limited ("**Trojan**"), the rights of those employed by Trojan ("**Trojan Employees**") and applicants to vacant roles advertised by Trojan, in respect of equal opportunities, diversity and inclusion in the workplace.
- 1.2 We pride ourselves in attracting great people. We value people for the differences they bring, and we believe that this diversity is key to ensuring everyone benefits from the energy transition.
- 1.3 Fostering an inclusive culture helps our company to benefit from a wider range of different perspectives, experiences, and skills. This creates a happier, more productive working environment for everyone.

2 POLICY STATEMENT

- 2.1 Trojan is committed to encouraging equality, diversity and inclusion among our workforce, and we promote a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying and victimisation.
- 2.2 Trojan, in providing goods, products, services and infrastructure, is also committed against unlawful discrimination of customers or the public.

3 APPLICATION OF THIS POLICY

- 3.1 This Policy applies to all aspects of employment with Trojan and engagement with our Employees and third parties. This policy is relevant to all stages of the employment relationship, including job applicants.

4 RESPONSIBILITY FOR THIS POLICY

- 4.1 The Head of HR is responsible for this policy and any necessary training on equal opportunities, diversity and inclusion.
- 4.2 We expect our people to take responsibility for ensuring that day-to-day working interactions create the right environment. Therefore, we expect everyone to observe, uphold, promote and apply this policy.

5 EQUALITY, DIVERSITY & INCLUSION

- 5.1 This Policy's purpose is to provide equality, fairness and respect for all Trojan Employees (whether engaged as permanent, temporary, part-time or full-time employees).
- 5.2 Trojan will take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible. Anyone making a decision about recruitment must not discriminate in any way. Every decision maker should challenge themselves and other members of the selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.
- 5.3 Trojan will not unlawfully discriminate because of the following (each a "**Protected Characteristic**" as set out in the Equalities Act 2010):
 - (i) age;
 - (ii) disability;
 - (iii) gender reassignment
 - (iv) marriage or civil partnership;
 - (v) pregnancy and maternity;
 - (vi) race (including colour, nationality, and ethnic or national origin);
 - (vii) religion or belief;
 - (viii) sex; and
 - (ix) sexual orientation.
- 5.4 Trojan will oppose and avoid all forms of unlawful discrimination. This includes in relation to:
 - (i) pay and benefits;
 - (ii) terms and conditions of employment;
 - (iii) dealing with grievances and discipline;
 - (iv) dismissal;
 - (v) redundancy;
 - (vi) leave for parents;
 - (vii) requests for flexible working; and
 - (viii) selection for employment, promotion, training or other development opportunities.
- 5.5 The following forms of discrimination are prohibited under this policy and are unlawful:
 - (a) **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.

- (b) **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.
- (c) **Harassment:** this includes sexual harassment and other unwanted conduct, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- (e) **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.

6 OUR COMMITMENTS

Trojan commits to:

- 6.1 Encourage equality, diversity, and inclusion in the workplace as they are good practice and make business sense. We expect you to treat your colleagues and third parties fairly and with dignity, trust, and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.
- 6.2 Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued. This commitment includes training managers and all other Trojan Employees about their rights and responsibilities under the equality, diversity, and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.
- 6.3 Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow Trojan Employees, customers, suppliers, visitors, the public and any others in the course of Trojan's work activities. Such acts will be dealt with as misconduct under Trojan's grievance or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Individuals can also be held personally liable for discrimination and harassment.
- 6.4 Make opportunities for training, development, and progress available to all Trojan Employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the company.
- 6.5 Make decisions concerning employees based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- 6.6 Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity, and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

7 DISABILITIES

- 7.1 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, including in relation to your mental wellbeing.

8 BREACHES OF THIS POLICY

- 8.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with Trojan's disciplinary procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 8.2 If you believe that you have suffered discrimination you can raise the matter by contacting the Head of HR / CEO. Complaints will be treated in confidence and investigated as appropriate.
- 8.3 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.