* * * Group Anti-Discrimination and Belonging at Work Policy* * *

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DEFINITION

Sirius Group ("**We**" or "**Group**") - Sirius Real Estate Limited (parent company, Guernsey registered) and its subsidiaries from time to time.

Registered office: Plaza House, Fifth Floor, Admiral Park, St Peter Port, Guernsey GY1 2HU, Channel Islands
Telephone number: +44 1481 743 898

Registered number: 46442

Discover more online: sirius-real-estate.com Sirius Real Estate @SiriusRE

1. Policy Purpose

Sirius is an equal opportunities employer, aiming to ensure equal opportunity for all current and prospective employees and the creation of an entirely non-discriminatory working environment where all staff are treated with dignity and respect. Sirius's continued success as a business depends heavily on its ability to fully and effectively employ suitably qualified individuals, regardless of race, colour, nationality, ethnic or national origin, religion or belief, gender, sexual orientation, gender reassignment, age, disability, marital or civil partner status, pregnancy, maternity or any other protected characteristic.

Our aim is to recruit, train and promote the best people for the job and to create a working environment free from unlawful discrimination, victimisation and harassment and in which all staff are treated with dignity and respect.

In order that Sirius may maintain a positive work environment for all Staff, you are required not to engage in or permit any fellow member of staff to engage in, any forms of discrimination against any person, whether or not, a Sirius employee in the course of your or their employment or engagement with or by us. This applies in the workplace, outside the workplace, when wearing a Sirius uniform and on work related trips or events, including social events.

You are required to comply with this policy when dealing with other employees, staff, job applicants, clients, suppliers, customers and contacts of Sirius as well as anyone else with whom you come into contact during your employment or engagement by or with us.

This policy extends to recruitment, terms and conditions of employment, training, career development, promotion, grievance and disciplinary procedures and all other aspects of employment. Any discrimination or harassment will be treated as a serious disciplinary offence.

2. What is Belonging at Sirius and Why does it Matter?

At Sirius, we believe that when people feel they belong, they do their best work, collaborate openly and help each other grow. Belonging means:

- I feel safe to be myself
- I am respected
- I am part of something that matters

When people live our values of Integrity, Humility, Adaptability and Industriousness, we build trust,

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unlock creativity and drive real performance.

Our goal is to make belonging a lived, everyday reality at Sirius: in every office, every business park and every team. When belonging grows so does performance, loyalty and innovation.

Belonging is how we live our values and how we win together.

3. Types of Discrimination

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 of their sexual orientation.

- 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 caring 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.

The law makes it unlawful to discriminate against job applicants in recruitment arrangements and decisions, employees and other workers in relation to terms and conditions, opportunities for training and promotion, dismissal and other matters and to certain ex-employees e.g. in relation to references.

4. Disabilities

If you are disabled or become disabled, we would encourage you to tell us about your condition so

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that we can support you as appropriate.

The group of people protected as "disabled" within the legislation covers not just those with physical disabilities, such as people in wheelchairs, but also people with mental impairments and less obvious physical impairments such as, for example, some forms of RSI and clinical depression. Depending on the circumstances, lack of knowledge that someone is disabled may not be a defence. You should always consider that an individual might have an impairment that counts as a disability without you knowing this.

We will take responsible steps to ensure that the working environment, practice, terms, and conditions of employment do not prevent disabled people from taking up positions for which they are suitably qualified, and, in all other respects, the best person for the job.

When a disabled employee commences employment, we will, in consultation with the disabled employee, ensure that such reasonable adjustments are made, as required, to enable them to work safely, effectively and to secure equal access to the benefits of employment.

If you experience difficulties at work because of your disability, you may wish to contact your line manager or the People & Talent team to discuss any reasonable adjustments that could be made to help you overcome or minimise the difficulty. They may wish to consult with you and your medical adviser about possible adjustments.

We will consider the matter carefully and make such adjustments as are reasonable to enable you to carry out your duties. This may include, in some circumstances, things such as the provision of specialist equipment, job re-design, re-training, flexible hours, remote working and/or re-deployment.

Where we do not have the relevant expertise to resolve the problem, we may consider consulting an outside specialist.

5. Breach of this Policy

All managers are responsible for ensuring that this policy is applied within their own business area.

You have a personal responsibility to comply with this policy and do your best to ensure that it is adhered to in your day-to-day work.

You must not discriminate or help others to do so in contravention of this policy. Breaches of this policy will be taken seriously and are likely to result in disciplinary action, up to and including dismissal for employees and the termination of any engagement/agreement that we have or any person providing services to us for those that aren't employees.

You may also be personally liable towards anyone you unlawfully discriminate against and may

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have to pay compensation on top of any compensation we might be ordered to pay.

6. Complaints

Sirius encourages employees and other individuals covered by this Policy to raise any concerns, complaints, or suspected breaches of this Policy as early as possible.

Concerns may be raised with a line manager, a member of the People & Talent team, or through any other appropriate internal reporting channel. All concerns will be treated as confidentially as reasonably possible and will be reviewed and investigated fairly, promptly and in accordance with applicable laws, internal procedures and the circumstances of the matter.

Individuals who raise concerns or participate in an investigation in good faith will not be subject to retaliation, victimisation or any other detriment. Sirius does not tolerate retaliation against any person who reports a concern, seeks advice, provides information, or supports another individual in raising a concern.

Where an individual wishes to report a concern relating to misconduct, unethical behaviour, legal or regulatory breaches, financial wrongdoing, or other serious matters, they may also use the reporting channels described in the Whistleblowing Policy. The Whistleblowing Policy sets out the procedures available for making protected disclosures and explains how such reports will be handled.

Any person who knowingly makes a false allegation or provides deliberately misleading information may be subject to appropriate disciplinary or other corrective action.

7. Status of this Policy

This policy does not form part of any contract of employment and does not create any contractual rights or obligations. Sirius reserves the right to amend, replace or withdraw this Policy at any time.

Aspects of this policy may need to be applied in different ways to cater for those who are not employees.

8. Review

This policy shall be reviewed and updated at least once a year and more frequently where:

- there are significant changes to applicable laws or regulations;
- incidents or audits indicate that changes are necessary.

Updates will be communicated to staff, and the latest version will be available on the intranet.

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Internal Use	
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Approved	Sirius Board, 28 September 2026
Circulation to	Sirius Board, all staff.
Publication	Workvivo, staff handbooks, site notice boards

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