

Equality, Inclusion & Diversity Statement

The scope of this policy statement extends to all Group activities. It covers all Group sites and offices, in the Isle of Man, Brazil, Malaysia and Singapore, as well as all its subsidiaries, which include:

- Valeberg Ltd
- Valeberg Capital Ltd
- Valeberg Commodities Ltd
- Valeberg Ecosolutions Ltd
- Valeberg Engineering Ltd
- Valeberg Property Management Ltd
- Valeberg Telecom Ltd
- Valevox Ltd

The Valeberg Group is committed to equal opportunity in recruitment and employment and to eliminating unlawful discrimination. Equality, diversity, and inclusion are at the heart of this policy.

Equality means ensuring everyone has the same opportunities to fulfil their potential, free from discrimination.

Diversity refers to the celebration of individual differences within the workforce.

Inclusion means ensuring everyone feels comfortable being themselves at work and valued for their contributions.

We will actively support diversity and inclusion and ensure that all our employees are valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential. We value people as individuals with diverse opinions, cultures, lifestyles and circumstances.

This policy covers all job applicants, employees, and workers, including agency workers and subcontractors. It applies to all areas of employment, including recruitment, selection, training, career development, promotion, and termination.

These areas are monitored, and policies and practices are reviewed if necessary to ensure that no unfair or unlawful discrimination, intentional or unintentional, direct or indirect, overt or latent, exists. Equality of opportunity, valuing diversity, and compliance with the law benefit all individuals in our company as it seeks to develop its people's skills and abilities.

While managers and supervisors have specific responsibilities for eliminating discrimination and providing equality of opportunity, individuals at all levels have a responsibility to treat others with dignity and respect. Every employee's personal commitment to this policy and application of its principles is essential to eliminating discrimination and providing equality throughout the company.

Management will ensure that recruitment, selection, training, development, promotion and termination procedures result in no job applicant, employee or worker receiving less favourable treatment because of a protected characteristic within the Isle of Man Equality Act 2017 which are race, including colour, nationality, ethnic or national origin and caste; religion or belief; disability; sex; sexual orientation; pregnancy or maternity; gender reassignment; marriage or civil partnership; and age.

In accordance with our overarching equal treatment ethos, we will also ensure that no one is treated less favourably on account of their trade union membership or non-membership or on the basis of being a part-time worker or fixed-term employee. The company's objective is to ensure that individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.

The company is committed to providing Managers and all other employees listed above with training on their rights and responsibilities under this policy. The company will take seriously and investigate thoroughly any complaints of bullying, harassment, victimisation, and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public, and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the company's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. We will ensure that the policy is circulated to any agencies responsible for our recruitment, and a copy will be made available for all employees and made known to all applicants for employment.

On an ongoing basis, we will monitor the make-up of our employees regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability for the purpose of encouraging equality, diversity and inclusion and in meeting the aims and commitments set out in this policy. Monitoring will also include assessing how this policy, and any supporting actions, are working in practice, reviewing them annually, and considering and taking reasonable steps to address any issues.

This policy will be communicated to all sub-contractors, reminding them of their responsibilities towards equal opportunity. The policy will be implemented in accordance with the appropriate statutory requirements, and full account will be taken of all available guidance and, in particular, any relevant Codes of Practice.

Management has the primary responsibility for successfully meeting these objectives by:

- not discriminating during engagement against employees, workers or job applicants.

- not inducing or attempting to induce others to practice unlawful discrimination.

- bringing to the attention of our workforce that they may be subject to action under the disciplinary procedures, or other appropriate action for illegal discrimination of any kind.

- creating an inclusive working environment by promoting dignity and respect for all; recognising and valuing individual differences and the contributions of all staff.

You can contribute by:

- not discriminating against fellow employees, workers, customers, clients, suppliers or members of the public with whom you come into contact during the course of your duties.

- familiarising yourself with this policy and all other policies and procedures related to grievance, discrimination and harassment.

Not inducing or attempting to cause others to practice unlawful discrimination; reporting any discriminatory action to your Line Manager.

The achievement of these objectives necessitates a contribution from everyone, and you must report any act of discrimination known to you.

If you consider that you are a victim of unlawful discrimination, you may raise the issue through the grievance procedure.

The Employee Handbook, located in the HR section of the intranet, details the company's grievance and disciplinary procedures.

Valeberg's Management Board approved this statement on behalf of the Group.

Darren J Harris

Founder / Managing Director

For and on behalf of the Valeberg Group of Companies

1st August 2025