

## Fair employment practices at Assura

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### Overview and principles

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Assura is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment.

We strive to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity, respect and fairness.

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### Obligations

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#### Responsibilities of Senior Managers:

- To ensure that Assura bases employment decisions on attitude and merit.
- To ensure that employment decisions are also made without considering a person's race, colour, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability or any other characteristic protected by law.
- To take positive action such as targeted marketing to increase opportunities in employment for women, minorities, people with disabilities.
- To respect employees' privacy rights and will use, maintain and transfer personal data in accordance with GDPR.
- To ensure Assura adopts fair and transparent policies and procedures in relation to all aspects of an employee's prospective and contractual employment with Assura, up to and including post-employment activities such as reference provision.
- To avoid discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- To consider any possible indirectly discriminatory effect of its standard working practices and make reasonable adjustments when possible.

#### Responsibilities of Managers:

- To promote fairness and equality of approach at all stages of an employee's or prospective employee's relationship with Assura.
- Lead periodic compliance reviews and take prompt corrective action where non-compliance is identified.
- Ensure all employees are trained in all aspects of policy compliance and understand how to apply all relevant policies and procedures to their role.

#### Responsibilities of Employees:

- You may not refuse to work or cooperate with others because of characteristics covered by this policy such as race, religion, sex, age, or other characteristic protected by law.
- Assura seeks to create a work environment free from harassment based on any protected characteristic, and free from bullying.
- Never to disclose employment data to a person who does not have a business need, the authority, or, where required, the subject's consent.

To consult with your manager and Head of HR where adherence to this policy may conflict with your personal customs or beliefs.

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### Policy scope

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This document sets out the overarching principles of conduct and standards of work. It should be read in conjunction with the employee handbook and Assura's policies and procedures.

Compliance with this policy is a condition of employment at Assura. Failure can result in disciplinary action which may result in the termination of your employment.

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Concerns should be escalated immediately. It is not necessary to know that a breach of our code or policies has occurred and concerns can be raised anonymously through any of the following channels:

- Head of Human Resources or Head of Legal
- Whistle Blowing hotline Expolink
- Next level of management
- Assura Board of Directors

Assura will fairly examine every concern through a robust and documented investigation process.

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### Other related matters

All records relating to this policy kept by HR in accordance with GDPR regulations and will be confidentially destroyed thereafter. This policy will be reviewed regularly to ensure that it continues to meet legislative requirements.

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