**PRIVATE CAPITAL BELGIUM ESG TEMPLATE**

**DISCLAIMER:**

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**INSTRUCTION MANUAL**

* **There is a set of ESG templates for portfolio companies in a private equity context and a venture capital context. This set covers these for private equity portfolio companies.**
* **Each template covers a specific ESG topic indicated in the title of the template. The full set of templates includes the following documents:**
  + **Employee Code of Conduct**
  + **Suppliers Code of Conduct**
  + **Anti-corruption & anti-bribery policy**
  + **Anti-discrimination policy**
  + **Whistleblowing policy**
  + **Privacy policy**
  + **Health & safety policy**
  + **Environmental policy**
* **Fields marked in yellow are cross-references to templates with other topics in the BVA ESG template set.**
* **Fields marked in green require policy discretion from the portfolio company.**

**Anti-Discrimination, Diversity and Inclusion policy**

[*Portfolio company*] (the **Company**) is committed to fostering a culture of inclusivity, equal opportunity, and continuous growth for all staff members.

**Discrimination based on protected characteristics, such as race, gender, age, religion, sexual orientation, disability, and any other distinguishing factor, is strictly prohibited within the Company’s operations.** **Every member of staff, regardless of background, must have equal access to opportunities for career growth and advancement.**

All guiding principles and potential actions that can be taken to ensure an effective implementation of this commitment are set out in this Anti-Discrimination, Diversity and Inclusion Policy (this **Policy**).

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| To which aspects of the Company’s business and for which persons within the Company is this Policy intended? | See section 1 (Scope). |
| What purpose does the Company want to achieve with this Policy? | See section 2 (Purpose and commitment) |
| What actions are forbidden and how should they be reported? | See section 3 (Prohibition of discrimination) |
| What actions are expected and encouraged? | See section 4 (Diversity and inclusion initiatives) |

1. **Scope**

This Policy applies to all aspects of employment by or through the Company, including recruitment, hiring, training, promotion, and termination. It extends to all employees, contractors, and stakeholders involved with the Company.

1. **Purpose and commitment**

The Company is committed to fostering a sound, inclusive and welcoming workplace where everyone feels included and is treated with respect, free of discrimination and harassment. The goal is to create a professional environment which values diversity in background and experiences, and where individuals are recognised and rewarded for their skills, dedication, and contributions, as such fostering a workplace where everyone can thrive.

Executive management, as well as all other members of staff and collaborators with the Company are expected to take into account and fully integrate this purpose in all of their actions and decisions for the Company.

1. **Prohibition of discrimination**

Discrimination based on protected characteristics, such as race, gender, age, religion, sexual orientation, disability, and any other distinguishing factor, is strictly prohibited within the Company.

Concerns or (suspected) instances of discrimination must be reported to the responsible manager, human resources, or through the procedure set out in the [Whistleblowing Policy].

Reports will be treated with the utmost seriousness, and a thorough investigation will be initiated promptly. Individuals making reports will be kept informed of the progress and outcome of the investigation to the extent allowed by law.

To ensure the protection of whistleblowers, the Company guarantees confidentiality, anonymity, and immunity from retaliation. Any form of retaliation against individuals reporting in good faith will be met with appropriate consequences, including disciplinary action and, if warranted, legal recourse.

1. **Diversity and inclusion initiatives**

In the pursuit of equal opportunities, the Company is committed to implementing fair and inclusive recruitment and promotion processes. Accordingly, the Company’s executive management will take decisions based on merit, skills, and qualifications, free from biases related to protected characteristics.

Furthermore, to create a welcoming and respectful work environment, the Company’s executive management is expected to engage in diversity and inclusion initiatives. These initiatives will not only raise awareness about the importance of diversity but also address unconscious biases, providing staff with the tools needed to create an environment that is respectful and free from discrimination.

[Optional*: a few examples of such initiatives are listed below. Please tailor this list to the specific situation of your portfolio company and/or add more initiatives.* Among others, the Company’s executive management expects to take the following initiatives on an as needed basis:]

* [Diversity training programmes: the Company implements workshops and training sessions that focus on diversity and inclusion, helping employees understand unconscious biases and cultural awareness, and fostering inclusivity.]
* [Flexible work arrangements: the Company offers flexible work schedules or remote work options to accommodate various needs, promoting work-life balance and inclusivity for employees with diverse personal situations.]
* [Inclusive leadership development: the Company develops leadership programmes that emphasise inclusive leadership skills, promoting diverse perspectives and ensuring that leaders actively champion a culture of equality.]
* [Accessibility initiatives: the Company ensures that the workplace is physically and digitally accessible for employees with disabilities. This includes accessible facilities, technologies, and accommodation policies.]
* [Regular diversity and inclusion assessments: the Company conducts regular assessments to measure diversity and inclusion within the organisation. Use employee feedback to identify areas for improvement and track progress over time.]
* […]

1. **Approval, amendments and entry into force**

This Policy has been issued and approved by [the Board of Directors/Management/other governing or supervisory body] who is responsible for the adequacy and appropriate overall implementation of the Policy.

Additions, revisions, amendments and abolishment of this Policy are to be approved by [the Board of Directors/Management/other governing or supervisory body]. This Policy will enter into force upon its adoption by [the Board of Directors/Management/other governing or supervisory b