

Schedule 3 Equal opportunities policy

1. EQUAL OPPORTUNITIES STATEMENT

The Company is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

2. ABOUT THIS POLICY

- 2.1 This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 2.2 The HR Department is responsible for this policy and any necessary training on equal opportunities.
- 2.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. DISCRIMINATION

- 3.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with clients, suppliers or other work-related contacts), and on work-related trips or events including social events.
- 3.2 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. For example, requiring a job to be done full-time rather than part-time would adversely affect

women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- (c) **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.
- (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.

4. RECRUITMENT AND SELECTION

- 4.1 Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.
- 4.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- 4.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 4.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

5. DISABILITIES

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.

6. PART-TIME AND FIXED-TERM WORK

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

7. BREACHES OF THIS POLICY

- 7.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 7.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.
- 7.3 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.

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Zhou
Date: 08/10/2024 17:20:57



NOVOGENE (UK) COMPANY LIMITED

GENDER EQUALITY POLICY

(February 2022)

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1. Gender equality statement

- 1.1 We, Novogene (UK) Company Limited (“the Company”, or “We”), are committed to promoting and implementing the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions in employment. You and any job applicants will receive equal treatment regardless of your sex.

2. About this policy

- 2.1 The purpose of this policy is to set out our approach to gender equal opportunities and the avoidance of discrimination relating to gender at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 2.2 For the avoidance of doubt, the terms “sex” and “gender” as referred to in this policy are interchangeable; “woman” or “man” shall include a person who has the Protected Characteristics of gender reassignment; “sex” of a person, where applicable, means the sex of an individual who has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex.
- 2.3 This policy is intended for use as an integral part and a supplement of the Company’s Staff Handbook (“Staff Handbook”). Unless otherwise stated, the definitions in Staff Handbook shall apply in this policy.
- 2.4 Every employee will have access to a copy of the policy and you are expected to become familiar with its contents. If there is any matter in this policy that you do not understand you should ask the HR Department for clarification.
- 2.5 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3. Who does this policy apply to?

- 3.1 This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

4. Who is responsible for this policy?

- 4.1 The board of directors has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the Head of the HR Department. Suggestions for change should be reported to the Head of the HR Department.
- 4.2 The HR Department has day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
- 4.3 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to gender equal opportunities. Managers will be given appropriate training on gender equal opportunities awareness and gender equal opportunities recruitment and selection best practice. The Head of the HR Department has overall responsibility for gender equal opportunities training.
- 4.4 This policy is reviewed annually by the Head of the HR Department.

5. Discrimination

- 5.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.
- 5.2 The following forms of discrimination related to sex are prohibited under this policy and are unlawful:
 - 5.2.1 **Direct discrimination:** treating someone less favourably because of sex. For example, rejecting a job applicant because of the job applicant is a woman or a man.
 - 5.2.2 **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular sex, 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 childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
 - 5.2.3 **Harassment:** this includes:
 - (a) Harassment related to sex. For example, where an employee is constantly telling derogatory or demeaning jokes about women generally and a particular individual (male or female) finds this unwelcome and offensive.
 - (b) Sexual harassment, a behaviour that has sexual content or sexual connotation. Examples include unwelcome physical touching, making sexual remarks to or

about a person, telling jokes with a sexual content or displaying sexually explicit images on a computer screen.

- (c) Less favourable treatment because the employee rejects or submits to harassment.

Harassment is dealt with further in our Anti-harassment and Bullying Policy.

5.2.4 **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about sex discrimination or harassment.

6. Recruitment and selection

- 6.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid sex discrimination. Shortlisting should be done with the involvement of the HR Department, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.
- 6.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular gender from applying.
- 6.3 We take steps to ensure that our vacancies are advertised to a diverse labour market.
- 6.4 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of sex. For example, female applicants should not be asked whether they are pregnant or planning to have children.
- 6.5 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' gender, along with other information including age, nationality, disability, and marital status as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve gender equality and diversity.

7. Training and promotion and conditions of service

- 7.1 Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

7.2 Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of gender disadvantaged or underrepresented groups.

7.3 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

8. Termination of employment

8.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly sex discriminatory.

8.2 We will also ensure that disciplinary procedures and penalties are applied without sex discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

9. Part-time and fixed-term work

9.1 Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

10. Gender Reassignment

10.1 Gender reassignment is the process where under medical supervision, the purpose of reassigning a person's sex by changing physiological or other characteristics of sex is undertaken. This may include counselling, hormone treatment or surgery.

10.2 A gender recognition certificate allows someone to legally change their gender assigned to them at birth. Applicants must be 18 or over, be diagnosed with gender dysphoria, have lived in new gender for two years and intend to continue living in their new gender.

10.3 It will not normally be necessary for the Company to be made aware of the gender history of an employee who has undergone gender reassignment. If we become aware of information relating to an employee's gender history, we will keep this information confidential. We will not disclose information about an employee's gender history to a third party without the employee's consent. Any records that we need to keep that relate to an employee's previous

gender, for example relevant qualifications in a previous name, will be kept confidential. When we no longer need to keep these records, we will destroy them.

- 10.4 The gender history of an employee with a gender recognition certificate will never be relevant to employment decisions. An employee with a gender recognition certificate will be treated in accordance with their acquired gender for all employment benefits including pensions and insurance.
- 10.5 An employee who has undergone gender reassignment but does not have a gender recognition certificate may be required to disclose their gender history for insurance or pension purposes. This information will be passed only to those people who require it for these purposes, with the consent of the employee and will be kept confidential.
- 10.6 An employee who discriminates against another employee on grounds of gender reassignment will be dealt with under the Disciplinary and Capability Procedure. Unacceptable behaviour such as intrusive questions, trying to 'out' an employee, name calling or derogatory jokes will not be tolerated.
- 10.7 We will be supportive of any employee who expresses an intention to undergo gender reassignment and will work with them to try to ensure as smooth a transition at work as possible.
- 10.8 The employee may require time off for medical or other treatment. Time off for these purposes will be treated no less favourably than time off for illness or other medical appointments.

11. Breaches of this policy

- 11.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary and Capability Procedure. Serious cases of deliberate sex discrimination may amount to gross misconduct resulting in dismissal.
- 11.2 If you believe that you have suffered sex discrimination you can raise the matter through our Grievance Procedure or through our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 11.3 There must be no victimisation or retaliation against staff who complain about sex discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary and Capability Procedure.

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Zhou
Date: 08/10/2024 17:20:57

TO WHOM THIS MAY CONCERN

Novogene (UK) Company Limited
Bio-Innovation, 25 Science Park,
Cambridge, United Kingdom
CB4 0FW

9th April 2024

Dear Sir or Madam

RE: Statistics On Novogene UK WorkforceGender distribution

As of 31 March 2024, Novogene UK Company Limited has employed 117 staff across the Europe among which 55.56% are female workers and 44.44% are male. The total figure of staff also includes 3.42% female employees who are on maternity or parental leave.

The types of employment and its respective proportion are:

- Full time permanent employee, 98.3%
- Part time contractor, 0.85%
- Full time fixed term employee 0.85%

Within the Company, females make up the largest proportion of the workforce. Gender distribution in accordance to seniority is as follows.

Managerial position	Female	Male
Executive Management	1	1
Sr. Director and Director	2	1
Manager	2	3
Supervisor	2	2

Gender pay gap

We look at the mean and median difference for pay gap. Mean difference indicates the difference in average salary, regardless of the nature or job grade of their positions. The calculation is by adding up the salary of all relevant staff and dividing the total number of staff. Median difference shows the difference in salary between the persons whose pay falls at the mid-point (from smallest to largest) of the banding.

As of 31 March 2024, the mean and median gender pay gap represents:

March 2024	Median	Mean
Gender pay gap	8.42%	7.1%

Equality

In line with Equality Act 2010, the following characteristics are protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

At Novogene UK Company Limited, we have released relevant policies and procedures, see other attachments, ensuring equality of opportunity is achieved across the organisation. The Company has Zero tolerance on any discriminative behaviours on any employee under any circumstances.

Yours Sincerely

HR Department

On behalf of Novogene UK Company Limited

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Date: 08/10/2024 17:20:57