

**Benevolent<sup>AI</sup>**

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**EQUALITY, DIVERSITY AND INCLUSION POLICY**

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**1. INTRODUCTION**

- 1.1 BenevolentAI (the “**Company**”) and its subsidiaries (together, the “**Group**”, “**we**” or “**our**”) are committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.
- 1.2 The aim is for our workforce, including the Company’s board of directors (the “**Board**”) and our executive and senior leadership teams, to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.
- 1.3 The Company recognises the benefits that diversity brings within its Board and within the executive and senior leadership teams across the Group and believes that this diversity is critical to our ability to be open to different ways of thinking and acting.
- 1.4 The Group, in researching and developing drugs, is also committed against unlawful discrimination of potential patients or the public.
- 1.5 This equality, diversity and inclusion policy (this “**Policy**”) is fully supported by our executive and senior leadership teams.
- 1.6 We may vary or amend this Policy at our discretion and may apply it as far as practicable in the circumstances.

**2. PURPOSE**

- 2.1 This Policy’s purpose is to:
  - (a) provide equality, fairness and respect for all who are employed by a Group company, whether temporary, part-time or full-time;
  - (b) not unlawfully discriminate under the Equality Act 2010, and any other applicable laws and regulations, including but not limited to the following protected characteristics of: age, disability, gender identity or reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation, political views, trade union membership, nature and duration of employment (employment for definite or indefinite period of time, full-time or part-time), health condition and disability; and
  - (c) oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working and selection for employment, promotion, training or other developmental opportunities.

**3. PRINCIPLES**

- 3.1 We commit to the following principles:
  - (a) Encouraging equality, diversity and inclusion in the workplace.

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- (b) Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
    - (i) This commitment includes training directors, managers and all other employees about their rights and responsibilities under this Policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.
  - (c) Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of work activities.
    - (i) All staff should understand they, as well as a Group company, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
    - (ii) Such acts will be dealt with as misconduct under the Group'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.
    - (iii) Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the 15 December 2009 agreement about harassment and violence in the workplace (declared of general application) and the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
  - (d) Making opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
  - (e) Taking decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under articles L.2411 *et seq.* and applicable Luxembourg laws).
  - (f) Reviewing employment practices and procedures when necessary to ensure fairness, and also update them and the Policy to take account of changes in the law.
  - (g) Monitoring the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this Policy.
    - (i) Monitoring will also include assessing how this Policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

**4. GRIEVANCE AND DISCIPLINARY POLICIES**

- 4.1 Details of our grievance and disciplinary policies and procedures can be found on the Company's intranet, Confluence. This includes with whom an employee should raise a grievance – usually their line manager.
- 4.2 Use of our grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within the applicable statutory limitation periods, following the alleged discrimination.
- 4.3 Breach of this Policy may result in disciplinary action, up to and including termination of employment. Members of the workforce may be required to remove any social media content that we consider to constitute a breach of this Policy. Failure to comply with such a request may in itself result in disciplinary action. You may also be personally liable towards anyone you unlawfully discriminate against.

**5. QUESTIONS AND FURTHER INFORMATION**

In case of any questions in relation to this Policy, please contact the Director of People.

**Approved by the Board on 12 March 2024.**