

INCLUSIVITY, DIVERSITY AND EQUALITY POLICY

The Company believes that inclusivity, diversity and equality are key to a successful and sustainable business and is committed to creating a culture where all team members can be themselves, feel respected and are able to work to the very best of their ability.

Bringing people together from diverse backgrounds ensures that the Company has a truly inclusive culture where employees are able to share unique skills and perspectives to drive innovation and deliver a customer experience that is second to none.

The Company is committed to having a workforce that is truly representative of all sections of society and its customers and will not tolerate any unlawful discrimination towards its employees, customers or members of the public.

General Principles

The Company is committed to:

- Recognising and valuing the individual differences and contributions of all employees and the benefits that these can bring to the business as a whole
- Providing a working environment that promotes equality, fairness and respect for all employees, irrespective of their employment status
- Creating a working environment that is free from bullying, harassment, victimisation and discrimination, that promotes dignity for all
- Providing opportunities to highlight and celebrate diversity, e.g through our internal blog
- Complying with all relevant equality legislation, (including the Equality Act 2010, relevant Codes of Practice and best practice guidance) so as not to discriminate against any individual on grounds of age, disability (physical or mental) family or marital status, pregnancy and maternity, race (including colour, nationality, and ethnic, national or social origin), religion or belief, sex (including pregnancy, childbirth, or related medical conditions and breast feeding needs) gender, sexual orientation, gender identity or expression, transgender status, medical condition, genetic information, veteran's status or military service
- Opposing and avoiding all forms of discrimination which is reflected in the Company's policies and practices on recruitment and selection, compensation and benefits, terms and conditions of employment, training and development, promotions and transfers, leave for parents, flexible working, problem solving, discipline, dismissal and redundancy
- Ensuring that all decisions in relation to recruitment, training and promotional opportunities are objective and based on individual merit

- Training all employees about their rights and responsibilities under the Inclusivity, Diversity and Equality Policy
- Making opportunities for training, development and progression available to all employees and helping and encouraging them to develop to their full potential, so that their talents and resources can be fully utilised to maximise the efficiency of the organisation
- Developing and overseeing its inclusivity, diversity and equality strategy through its Inclusivity and Diversity Committee which meets on a quarterly basis to review and identify opportunities to increase inclusivity, diversity and equality across the organisation
- Monitoring the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation and disability in order to encourage inclusivity, diversity and equality and meet the aims and commitments set out in its Inclusivity, Diversity and Equality Policy
- Reviewing employment practices and procedures as appropriate, to ensure that they are both consistent and fair and reflect any changes to employment law
- Reviewing the effectiveness of the Inclusivity, Diversity and Equality Policy and relevant working practices on an annual basis and amending them as appropriate
- Taking seriously complaints of bullying, harassment, victimisation and discrimination by any Company employee towards their colleagues, 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 organisation's Problem Solving and / or Disciplinary Policies, with serious complaints potentially amounting to gross misconduct, which may result in dismissal
- Not tolerating any bullying, harassment, victimisation and discrimination towards Company employees from customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. In such circumstances the Company will support the employee to try to resolve the situation however, if this is not possible, more formal action will be taken.

Employee Responsibilities

All employees should understand that both they and the Company, can be held liable for acts of bullying, harassment, victimisation and discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public. They should therefore ensure that they are fully responsible for:

- Respecting the dignity and diversity of their colleagues, customers, suppliers and the public

- Promoting an inclusive environment that is free from discrimination, bullying and harassment
- Enhancing their awareness of potential unconscious bias and how this may affect the ability of themselves and their colleagues to be fully collaborative with one another
- Focusing on conscious inclusion to be more intentional with their actions to drive diversity, equality and belonging
- Always acting in a professional and non-discriminatory way when interacting with customers, suppliers and the public, to include social and other events that take place outside of the workplace
- Completing mandatory inclusivity, diversity and equality training, as required by the Company
- Contacting the People Department, their Line Manager or one of the Inclusivity and Diversity Experts if they become aware of an employee who may be subject to bullying, harassment, victimisation or discrimination either from hearing a complaint or by receiving information relating to such conduct
- Supporting the Company to meet its inclusivity, diversity and equality responsibilities in all aspects of their employment

Manager Responsibilities

In addition to their responsibilities as an employee, Managers are also responsible for:

- Creating a culture that inspires respect for all employees, customers, suppliers and contractors within the working environment
- Drawing from the widest pool of talent available to create a diverse team that reflects the communities that the organisation serves
- Ensuring that all employee related decisions are free from discrimination
- Mitigating potential unconscious bias in employment decisions and talent practices, including recruitment and selection, pay and benefits and learning and development
- Role modelling inclusive and respectful behaviour in the working environment and all work-related activities
- Consistently displaying inclusive leadership behaviours, valuing all perspectives and listening to diverse points of view to promote a fully inclusive working environment

- Encouraging employees to collaborate, make suggestions and to respect and listen to diverse opinions
- Engaging in conscious inclusion and other behaviours (e.g. acting as an active bystander and calling people out) to promote workplace equality
- Providing reasonable accommodations for example for individuals with a disability or those with needs related to religious observances
- Appropriately addressing any behaviour not consistent with this, other policies and / or applicable laws relating to inclusivity, diversity or equality

Inclusivity and Diversity Experts

The Company has appointed a number of trained Inclusivity and Diversity Experts, whose roles are to act as advocates and support inclusivity and diversity initiatives across the business. This includes supporting individuals from diverse backgrounds and being a point of contact for employees to discuss inclusivity and diversity issues in confidence, knowing that they will receive the most appropriate advice and support.

Dealing with Inappropriate Conduct

The Company will not condone behaviour that is likely to undermine the dignity, self-esteem or productivity of an employee, and will seek to prevent any such behaviour. Any instances or allegations of bullying, harassment, victimisation or discrimination of which it is aware, or ought reasonably to be aware, will be dealt with both expeditiously and fairly.

If an employee believes that they have been subjected to bullying, harassment, victimisation or discrimination they should wherever possible, make their unease and / or disapproval known to the offending party immediately. A written record of the date, time and nature of the incident(s) and the names of any witnesses should be kept.

Where a problem cannot be resolved informally, or an employee does not feel comfortable making their unease / and or disapproval known to the offending party, they may make a formal complaint involving bullying, harassment, victimisation or discrimination in accordance with the Company's Problem Solving and / or Disciplinary Policies.

The Company will not tolerate threats or acts of retaliation of any kind against any employee because they report conduct reasonably believed to violate this policy or in good faith provide information in connection with a report or investigation of any such conduct.

Employees who do not comply with this policy and / or are found to have engaged in bullying, harassment, victimisation or unlawful discrimination will be subject to disciplinary action which may lead to the termination of their employment.