

*Hill & Smith Holdings PLC (“the Group”) values every employee as an individual and is committed to equality, diversity, and inclusion among our workforce, which means recognizing and respecting individual differences and eliminating unlawful discrimination. In particular, the Group is committed to promoting equality of opportunity for all employees and the right of employees and prospective employees to fair and equal treatment.*

#### Introduction

This Policy covers equality, diversity, and inclusion in employment, and extends to third parties such as suppliers, customers, or visitors to our premises. As an employer working across a range of cultures and countries globally, we endeavor to have a diverse workforce and an inclusive and supportive working environment in all locations. Our aim is for our workplace to be representative of the relevant labour market, and for every employee to be respected and able to contribute effectively.

#### Scope

This Policy applies in every country, subsidiary company, and location within the Group, although it does not form part of any employee’s contract of employment. This Policy covers all the Group’s employees as well as directors, officers, consultants, contractors, casual workers, agency staff (collectively referred to as employees or the workforce in this Policy) and job applicants.

This Policy applies to all employment related activity. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, the application of disciplinary and grievance procedures and termination of employment.

At subsidiary company level, there may be a similar policy that applies which is more suitable for that jurisdiction, and additional or different principles and standards to observe. However, subsidiaries are required to reflect the spirit and principles of this Policy in their local policy document.

#### Our Commitment

The Group will not tolerate any breach of this Policy, which means that any related concerns raised will be investigated and where there is a case to answer, the matter will be handled under the Disciplinary Policy and procedure.

The principles of non-discrimination and equality of opportunity also apply to the way in which the Group treats visitors, clients, customers, suppliers, and where relevant, former staff members.

#### Policy Review

This Policy will be reviewed annually and when relevant developments in the regulatory landscape require. This Policy should be read in conjunction with the Dignity at Work Policy which sets out the Group’s policy on dignity and respect, and ensuring a working environment free of discrimination, bullying and harassment.



## Roles and responsibilities

Every individual in the Group has a personal responsibility to familiarize themselves with this Policy and to act in accordance with its provisions. This means treating colleagues and third parties in a respectful, inclusive, and non-discriminatory way. Any employee can be held liable for inappropriate behaviour towards colleagues under this Policy, both individually and with the employer.

Directors and managers have a specific responsibility to set an appropriate standard of behaviour, to lead by example, and to ensure that those they manage adhere to this Policy.

Managers and supervisors have specific responsibility for ensuring that decisions affecting employees or potential employees in their teams are made in a non-discriminatory manner and that the objectives of this Policy are cascaded throughout the organization.

All employees have a duty to act in accordance with this Policy, to treat colleagues with dignity, and not to discriminate against another employee.

Appropriate training will be provided as necessary to ensure individuals behave in a manner which shows a clear understanding of, and commitment to, diversity and equality.

## Definitions

The organization has a legal responsibility to prevent harassment and other unacceptable behaviours on the grounds of protected characteristics, which may vary from country to country. The definitions of protected characteristics that follow, reflect the meanings set out in the UK's Equality Act 2010, and include age, sex/gender, disability, marital or civil partner status, pregnancy or maternity, colour, race, nationality, ethnic or national origin, region or belief, sexual orientation or gender reassignment.

Discrimination is less favourable treatment of a person or persons that cannot be justified, and the following definitions may represent potential breaches of this Policy:

- Direct discrimination, where a person is treated less favourably because of a protected characteristic.
- Associative discrimination, where a person is treated less favourably because of their association with someone with a protected characteristic.
- Discrimination by perception, where a person is treated less favourably because they are perceived to have a protected characteristic.
- Indirect discrimination, where a requirement or condition which is applied equally to all employees has a disproportionately adverse effect on one person or group of individuals and cannot be objectively justified.
- Victimization, where a person is afforded less favourable treatment for example because of action they take to assert their statutory rights against a form of discrimination, or to assist a colleague in that regard.



## Recruitment & Selection

- Harassment, which is any unwanted conduct related to a protected characteristic that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- Bullying, which is offensive, intimidating, malicious, or insulting behaviour, perhaps the apparent misuse of power that undermines, humiliates, denigrates, or harms the recipient on the grounds of a protective characteristic. This is normally a persistent pattern of mistreatment from others in the workplace that causes either physical or emotional harm and it can be in the form of verbal, psychological or physical abuse.

The Group and its subsidiaries will ensure that there is access to a wide labour market and that the most suitable candidates are appointed to match the role's requirements.

The Group aims to ensure that no job applicant suffers discrimination because of a protected characteristic and strives to ensure that applicants are assessed fairly and on merit.

The Company's recruitment processes aim to ensure that individuals are treated fairly based on merit and abilities in relation to the role. In particular:

- Job selection criteria should be relevant to the job and not disproportionate.
- Shortlisting of applicants should be done by more than one person wherever possible.
- Job advertisements should avoid stereotyping or using wording that may discourage groups with a protected characteristic from applying.
- The Group takes steps to ensure that its vacancies are advertised to a diverse labour market.
- The Group will monitor its practices to ensure that it is non-discriminatory or unbiased.

## Career Management

All relevant employees will be given appropriate access to training as required and all promotion decisions will be based on merit (apart from any necessary and limited exceptions and exceptions allowed under the Equality Act). Succession plans are reviewed to ensure that ambitious individuals with the potential to develop their careers are identified and supported.

## Remuneration

The mechanisms through which pay, and benefits are set, either on appointment or subsequently will be applied fairly and consistently. In particular, the Group reviews the way in which base pay and bonuses are managed in relation to the gender pay gap.

## Policies & Procedures

The Group will also ensure that employment policies and procedures are applied without differentiation to all employee groups. Employment practices and procedures will be reviewed regularly to take account of relevant statutory changes.



### Monitoring

Evaluate and monitor the make-up of the workforce in relation to protected characteristics in encouraging equality, diversity, and inclusion, and in meeting the commitments set out in this Policy.

### Processes for resolving concerns

Individuals who believe they have been discriminated against are encouraged to raise the matter informally with their line manager in the first instance, or alternatively by speaking to a member of the HR team.

It is sometimes the case that an individual is not aware that their behaviour is unwelcome and upsetting, and most people who are advised that this is the case, would appreciate an informal approach to resolving the issue. If this is not possible, the following options also apply.

A grievance can be raised formally under the Company's grievance procedure where an informal approach has not proved satisfactory or practical.

Allegations regarding potential breaches of this Policy will be treated in confidence and investigated. Employees who make such allegations in good faith will not be treated less favourably as a result.

### Reporting Process

Employees are encouraged to use the Speaking Up or 'Don't Walk, Talk' service which is a confidential mechanism hosted by Navex Global for raising concerns about the workplace which need to be raised for the public good.

This service is independent of the Group and it can be accessed via [www.hsholdings.ethicspoint.com](http://www.hsholdings.ethicspoint.com). Where employment related concerns are raised via this mechanism, they will be reviewed by Navex Global and referred on appropriately within the Group for resolution under existing employment policies and procedures.

Any situation where an individual, may be in breach of this Policy will be investigated under the Disciplinary Procedure. In some circumstances, a breach of this Policy, may result in a range of disciplinary sanctions including summary dismissal.

In some cases, harassment can amount to both an employment and a criminal matter, for example in the case of sexual harassment.

Approved by the Board of Directors of Hill & Smith Holdings PLC – 24 September 2020