

# Equality, diversity and inclusion policy

This policy sets out HR Wallingford Limited's (the "Company") commitment to equality of opportunity and the avoidance of discrimination at work. The Company is an equal opportunities employer and opposes all forms of unlawful discrimination.

The Company believes that individuals should be treated on their merits and that employment-related decisions should be based on objective criteria. All Staff ("Staff" meaning employees, consultants, contractors, directors, officers, casual and agency workers and volunteers), and particularly those with responsibility for management of others or employment-related decisions, must comply with this policy and should request training if there is any doubt as to its application.

The policy applies to all aspects of employment, including the advertising and appointment to jobs and any other aspects of recruitment, pay and benefits, training, appraisals, promotion, conduct at work, disciplinary, grievance and performance procedures and termination of employment.

You must not unlawfully discriminate against or harass other people including current and former Staff members, 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 or, if relevant, when wearing a work uniform), and on work-related trips or events including social events.

This policy is non-contractual and does not form part of the terms of your contract with the Company, which are provided to you separately. In the event that the terms of your contract and this policy differ the terms of your contract shall apply. The Company will review this policy and may amend it from time to time. All Staff will be informed of any amendments to this policy in writing, either by letter or by email.

## Responsibility for this policy

To ensure this policy is fully effective, we have appointed a sponsor at the same level as the Company's board of directors (as constituted from time to time) (the "Board"), with responsibility for overseeing its implementation and reporting to the directors. They will ensure that the policy is implemented within their own areas of responsibility and will deal with any matters arising, taking advice from Personnel when appropriate.

We have set up a diversity working group who is responsible for proposing and implementing actions to support the effective implementation of this policy.

Specialist advice, training, guidelines on policy implementation, and the submission of any required reports on the policy, will be the responsibility of Personnel.

As a consequence of this we have agreed the following actions:

- to take appropriate action in accordance with the Company's Disciplinary Policy against employees who are found to infringe this policy;
- to provide guidance and training as and when required, particularly to line managers;
- to ensure that employees are aware of their responsibilities under the current Equality Act 2010; and
- to monitor the outcome of the policy and to regularly examine and review existing procedures and criteria in the implementation of the policy.

## The law

Current legislation outlaws discrimination on grounds of sex, marital status, civil partner status, gender reassignment, pregnancy, exercise of the right to take maternity leave, race, colour, ethnic or national origin, nationality, religion or belief, sexual orientation, disability or age ("Protected Characteristics").

Direct discrimination occurs where a person is treated less favourably because of an actual or perceived Protected Characteristic and, in the case of age only, such treatment is not justified. Examples are if someone is refused promotion on the grounds that he or she is black or white, disabled, a woman or a man, Christian or Muslim, heterosexual or homosexual. Direct discrimination may also occur where a person is treated less favourably due to an associated person's Protected Characteristic.

Indirect discrimination occurs where an individual with a particular Protected Characteristic is subject to a provision, criterion or practice which puts him/her at a disadvantage and it is not justified.

Harassment 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.

Victimisation is where someone is subjected to a detriment because he or she has raised an allegation of discrimination, taken action against the Company or has assisted another to take action against the Company and where such actions were taken in good faith.

Legislation makes it unlawful to treat someone who is disabled less favourably because of their disability or because of something arising as a consequence of their disability. The definition of 'disabled' within the legislation is wide; it includes people with mental impairments and less obvious physical impairments, including clinical depression and some forms of RSI. Some forms of less favourable treatment can be justified.

There is also a positive duty to make reasonable adjustments to provisions, criteria or practices to accommodate the needs of a disabled person. Examples include alterations to workstations, duties, hours or working practices.

If you are or become disabled while working for the Company, you are encouraged to discuss your condition with Personnel so that the Company is best placed to help and support you. If you consider that the Company could help you by making adjustments to your working hours, workplace or working conditions please make these suggestions to Personnel. In appropriate circumstances we will need to consult with medical advisers and you as to how to best accommodate your needs and those of the Company.

## Recruitment and promotion

The Company will take steps to ensure that applications are attracted from all people regardless of their Protected Characteristics and that there is equality of opportunity in all stages of the recruitment process. Where appropriate, employees responsible for recruitment will receive training in equal opportunities and guidance will be available to all employees.

Job applicants will not normally be asked about health or disability before a job offer is made, unless it is required:

- to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
- to establish if any adjustments need to be made to the recruitment process;
- to assist positive action to recruit disabled persons; and/ or
- for equal opportunities monitoring (which will not form part of the selection or decision-making process).

We may make job offers conditional on a satisfactory medical check or ask you to complete a medical questionnaire before commencing employment.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

Promotion within the Company is based solely on merit and without regard to a person's Protected Characteristics.

## Objectives

In support of the Company's commitment to equality of opportunity and the avoidance of discrimination at work, it has set the following objectives.

The Company's equality objectives include, but are not limited to:

- avoiding unlawful discrimination in all aspects of employment (including recruitment, promotion, opportunities for training, pay and benefits);
- ensuring that person and job specifications are limited to those requirements that are necessary for the effective performance of the job;
- assessing both applicants for promotions and for roles with the Company on the basis of their suitability, capability and qualifications;

- striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect; and

The Company's diversity objectives include, but are not limited to:

- continuing to understand the current diversity of our organisation including the gender pay gap, the Company's engagement survey, and other relevant methods;
- communicating how diversity contributes to our organisational values and the links to our goals and objectives;
- taking positive action to increase the diversity of our internal and external recruitment and selection pools; and
- benchmarking, measuring, and reporting our diversity and inclusion metrics allowing us to set clear goals using our own metrics and benchmarks from our engagement survey.

The Company's inclusivity objectives include, but are not limited to:

- utilising the Company's diversity working group to create an inclusive workplace in which people are accepted as individuals regardless of their differences and where they feel their contribution is valued;
- supporting our people to recognise that some groups and individuals have particular and specific requirements that need to be met if they are to enjoy working with us;
- seeking to better understand staff feedback on inclusion and act upon the results; and
- reviewing our policies and procedures to ensure that they take appropriate account of the diverse needs of our employees, customers, and stakeholders.

## Responsibilities

Employees, including those working from home, whether on full-time, part-time, indefinite, fixed or temporary contracts, regardless of length of service, are responsible for playing their full part in adhering to the policy. This means becoming familiar with the policy and its requirements and carrying them out, as well as critically examining attitudes to ensure that discrimination is not allowed to affect judgement. The law and the existence of this policy cannot by themselves prevent unjustified discrimination. You can help to do this by:

- treating your colleagues with dignity and respect;
- valuing the differences that exist between people and cultures;
- being aware of how your own behaviour may affect others and changing it if necessary (you can still cause offence even if you are "only joking");
- being aware of the forms which discrimination can take, to guard against them and to avoid any action that might influence others to discriminate unfairly;
- taking a stand if you think inappropriate jokes or comments are being made;
- making it clear to others when you find their behaviour unacceptable,
- intervening, if possible, to stop bullying or harassment and giving support where appropriate;

- making it absolutely clear that you find bullying and harassment totally unacceptable; and
- reporting bullying or harassment to your manager or Personnel and supporting the Company in the investigation of complaints.

Line managers are responsible for the above along with:

- implementing this policy and related processes and for monitoring the implementation in the day-to-day activities of their business area or function;
- setting a good example by their own behaviour;
- ensuring that there is a supportive working environment;
- making sure that staff know what standards of behaviour are expected of them;
- intervening to stop bullying or harassment;
- reporting promptly to Personnel any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them;
- ensuring facts are established with regard to alleged bullying and harassment; and
- taking appropriate action, with support from Personnel, against employees found to have infringed this policy.

Personnel is responsible for the above, along with supporting the line managers and:

- ensuring that employees are aware of their responsibilities under this policy;
- providing guidance as and when required, particularly to the relevant decision makers;
- ensuring training is made available to line managers to support the management of staff in an effective, fair and respectful manner;
- supporting line managers to take appropriate action against employees found to have infringed the policy in accordance with the Company's procedures; and
- monitoring the effectiveness of this policy through anonymous surveys and other means, and to keep under review procedures and criteria in the implementation of the policy, in discussion with employee representatives.

## Terms and conditions of employment

All of the Company's employees are treated fairly and non-discriminately. Terms and conditions of employment, including pay and benefits, are offered by reference to the role fulfilled by the employee. No regard is paid to Protected Characteristics when decisions regarding terms and conditions of employment are made, except where the law and/or matters of good practice permit and/or encourage the Company to provide additional assistance to employees on any of these grounds.

Fixed term and part-time employees will usually enjoy the same terms and conditions of employment and be treated the same as comparable full-time or permanent employees, except in circumstances where different treatment is justifiable.

## Formal action and termination of employment

Formal action in respect of misconduct and/or performance, including any decision to dismiss or terminate your contract, will be taken on the basis of alleged misconduct or poor performance and any such action will be non-discriminatory.

If the Company has to consider redundancies, it will ensure that any selection criteria are fair and objective and not directly or indirectly discriminatory.

## Monitoring and review

In order to ensure that the Company is providing equal opportunities to its employee, the Company may ask job applicants and current employees to complete a monitoring form. Provision of any such information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment.

The Company will review this policy periodically and in light of any monitoring results to make sure that the policy is effective and up to date.

The Company may review periodically the salaries paid to all its employees to ensure that there is no inadvertent discrimination. If changes are required, the Company will implement them.

## Training

All employees will be provided with equal opportunities training as part of their induction process.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equal opportunities.

## Complaints

If you believe that you are suffering or have suffered from discrimination you can, if you wish, raise the matter informally with the person you believe is responsible. Alternatively, you may raise the matter in accordance with the Company's Grievance Procedure.

If you believe that you have been harassed then you may also bring a grievance or raise the matter in accordance with the Company's Anti-Harassment and Bullying Policy.

Anyone raising an allegation of discrimination in good faith will not be victimised or subject to any form of detriment. However, false allegations or those made in bad faith will be treated as a disciplinary matter under the Disciplinary Procedure and may result in disciplinary action up to and including summary dismissal.

## Breaches of this policy

All Staff must comply with this policy and any breaches will be taken very seriously.

Any breaches by an employee are likely to be treated as gross misconduct and result in action being taken under the Company's Disciplinary Procedure up to and including summary dismissal.

If any other (non-employee) member of Staff fails to comply with this policy the Company may decide to stop providing that member of Staff with work or terminate their contract with the Company immediately and without notice or compensation.

You may also be personally liable for the payment of compensation as a result of unlawfully discriminating against another person.

If you consider that this policy has been breached, you are encouraged to raise your concerns with your manager as soon as possible.

## Customers and service providers

The Company is generally free to decide whether to accept instructions from any particular customer. However, no customer will be refused our assistance because of a Protected Characteristic. The Company will assist customers and potential customers as required under the Equality Act 2010 and take any further lawful positive action to assist them where it seems such action is appropriate.

All Staff, suppliers, agents and other third parties engaged by the Company are chosen on merit and suitability for the relevant task. Such decisions are untarnished by discrimination.

If you feel you have been bullied or harassed by a customer, supplier, visitor or other third party in the course of your work, you should report the matter to your line manager immediately who will take appropriate action and not attempt to resolve it yourself.

## Territory

This policy has been prepared principally with reference to the laws of England and Wales, but the Company is committed to compliance with the laws and regulations of all jurisdictions in which it operates. This policy shall accordingly be read and interpreted, as far as is possible, so that it is line with the applicable legal jurisdiction and the Company reserves the right to depart from the terms of this policy as may be necessary to comply with legal requirements.

**Ridha Bentiba**

Chief Executive Officer (Joint), HR Wallingford Ltd

**Signed:**



**Date:** 09 July 2026

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