Equality, Diversity & Inclusion Policy

The Company is fully committed to the elimination of unlawful and unfair discrimination, and values the differences that a diverse workforce brings to the Company.

Employees are the key to the success of the Company. Each person is unique, whether in terms of their background, personal characteristics, experience, skills or motivations, and the Company values employees for the differences they bring to the table.

Fostering an inclusive culture helps each of us to benefit from a wider range of different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

To support this inclusive culture, this policy:

- outlines the Company's commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours the company expects of employees in support of this commitment;
- eliminates unlawful discrimination and harassment; and
- sets out the key steps we take to make the Companies culture as inclusive as possible, including the diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

This policy applies to conduct both in the workplace and outside of the workplace that is related to work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on the Company's reputation (e.g. the expression of views on social media).

Within **evo** companies (VOW Europe, Banner Group, Complete, Premier Vanguard, Truline) the Group People Director holds ultimate responsibility for ensuring the requirements of equality and diversity are met. This person takes ownership of any issues that arise and ensure they are appropriately resolved. This policy will be reviewed annually, to ensure it remains relevant and compliant with national and international legislation and standards.

This policy will be made available to view by all employees, subcontractors, suppliers, stakeholders and shareholders, visitors and members of the wider public by way of publication on internal and external websites, inclusion in Company processes such as induction and training and printed physical copies available on the Company sites.

Any reference to 'the Company' is a reference to the relevant employing Company within the Company. This policy applies to all employees, including contractors, agency workers and the self-employed across the UK and ROI. This Policy is not contractual and may be amended from time to time at the Company's sole discretion.

1. evo's Commitment To One and Other

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation. Equality and diversity considerations will be incorporated in all activities so that it becomes common practice.

We expect all employees take personal responsibility for observing, upholding, promoting and applying this policy. In addition to promoting equality by challenging misconceptions, stereotypes and prejudice by highlighting and working to eliminate any practices that are potentially discriminatory. The Company's culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility that we all share.

The Company will ensure that recruitment, promotion and retention procedures do not treat people less favorably because of their:

- age;
- disability;
- gender identity or gender reassignment status;
- marital or civil partnership status;
- pregnancy or maternity status;
- race, racial group, ethnic or national origin, or nationality;
- religion or belief;
- sex; or
- sexual orientation.

Behaviour, actions or words that transgress the policy will not be tolerated. If any employees are found to have committed, authorised or condoned an act of discrimination, harassment, bullying or victimisation we will take action in line with The Company's Disciplinary Policy and procedures.

Every Manager has a responsibility to:

- Foster a climate that discourages the occurrence of harassment;
- Ensure that staff are treated with dignity and respect;
- Act upon potential breaches of this policy and unacceptable behaviour even in the absence of a formal complaint; and
- Ensure that employees have an understanding of this policy and know where to seek help.

Every Employee has a responsibility to:

- Not unlawfully discriminate in any employment practice/process;
- Draw to the attention of Senior Managers suspected discriminatory acts or practices;
- Co-operate with measures introduced to ensure equality of opportunity and non-discrimination;
- Refrain from harassment or intimidation of other employees;
- Refrain from victimising employees who have made allegations or complaints of discrimination or who have provided information about such discrimination; and
- For employees to read and familiarise themselves with this policy as part of the employees' induction.

Employees should be aware that they can be personally liable for discrimination and harassment.

2 Inclusive Culture

The Company values all differences; and that creating an environment where individuals feel celebrated for those differences is paramount to fostering a culture of acceptance, diversity, respect, and collaboration. The Company firmly believe that every individual, regardless of their background, identity, or abilities, deserves equal opportunities for growth, contribution, and recognition.

We strive to create an inclusive environment where all employees feel valued, respected, and empowered to bring their authentic selves to work, without the need to conform to any perceived 'norms'. This means actively embracing diversity in all its forms, including but not limited to race, ethnicity, gender, sexual orientation, age, disability, and religion. We are committed to providing equitable access to resources, support networks, and career advancement opportunities for all members within the Company.

We truly believe that by celebrating employees differences and leveraging the unique perspectives and talents of each and every individual, we not only enrich workplace culture but also drive innovation, creativity, and success as a unified team.

We expect all employees to work together to create and maintain an inclusive environment through their everyday actions, processes and practices, with the support and guidance of the Company. We encourage all employees to speak up if they have any ideas regarding inclusion initiatives the Company can adopt to support employees, regardless of their background or circumstance, to thrive at work.

2.1 Definitions

The Company, in following the Equality Act 2010, will adhere to the following legal definitions regarding breaches of the Equality Act, to protect those people with the characteristics set out in Section 1. Breaches of the Equality Act 2010 occur on the following grounds:

- Discrimination by or against an individual unless there is a specific legal exemption. Discrimination can be intentional or unintentional and may occur directly, indirectly, by association or by perception.
    - **Direct discrimination** occurs where someone is treated less favourably because of one or more of the protected characteristics, when compared to someone who does not have that characteristic.
    - **Indirect discrimination** occurs where a policy, procedure or way of working that applies to all colleagues, puts people with one or more protected characteristics at a disadvantage, compared with people who do not have that characteristic.
    - **Associative discrimination** refers to treating someone less favourably because they are associated with someone who has a protected characteristic.
    - **Discrimination by perception** occurs when someone is treated less favourably because individuals perceive them to have a protected characteristic, even if they do not.
- There are also two specific types of discrimination that apply only to the disability characteristic:
    - **Discrimination arising from disability** refers to treating someone unfavourably because of something connected with that person's disability and this treatment is not justified.
    - **Failure to make reasonable adjustments** in line with the Company's legal obligations takes place when we fail to ensure that aspects of an employee's employment, or Company premises, does not put a disabled person at a substantial disadvantage.
- **Harassment** is unwanted conduct related to a protected characteristic which has the purpose or effect of violating someone's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment.

- **Sexual harassment** is conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment. In addition, sexual harassment refers to less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.
- **Bullying** refers to behaviour that is offensive, intimidating, malicious, insulting or an abuse or misuse of power, which is usually persistent and has the effect of undermining, humiliating or injuring the recipient.
- **Victimisation** is treating someone detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint.

In addition, the Company prohibits **instructions to discriminate**. This practice refers to the action of singling out an individual for unjust treatment by way of a senior member of staff ordering an individual is treated less favourably.

3 Commitment Through Company Policies and Practices

The below are some specific areas of application, however this list is not exhaustive, and the Company commits to continuous reviews of this policy and any relevant practices, to ensure it remains effective and achieves the Company's objectives:

3.1 Recruitment and Selection

The Company recognises the benefits of having a diverse workforce and will take steps to ensure that:

- We endeavour to recruit from the widest pool of qualified candidates possible;
- The Companies employment opportunities are open, transparent and accessible to all on the basis of their individual qualities and personal merits;
- The Company's selection criteria and processes do not discriminate due to any of the protected characteristics (listed in section 1);
- All recruitment agencies acting for the Company are aware of the requirement not to discriminate and to act accordingly;
- Applicants will not be asked about health or disability before a job offer is made. There are limited exceptions, for example:
    - Where questions are necessary to establish if an applicant can perform an intrinsic part of the job (subject to reasonable adjustments) or to establish if an applicant is fit to attend an assessment or needs adjustments to be made during the interview process.
    - To complete equal opportunities monitoring (which will not form part of the decision-making process).

3.2 Terms and Conditions of employment

All terms and conditions will comply with anti-discrimination legislation. The provision of benefits, such as flexible working hours, maternity, paternity and other family leave arrangements, performance appraisal systems, bonus schemes and any other conditions of employment, will not discriminate against any employee based on any of the protected characteristics.

3.3 Gender Pay Gap

The Company commits to annually analysing and publishing its Gender Pay Gap reporting for all companies within the group that have 250 or above colleagues. The report will be published on each Company's website and viewable to external parties. Any Gender Pay Gap will be analysed in detail and commitment will be made to taking action where appropriate.

3.4 Promotion and Career Development

Selection criteria for both promotion and career development opportunities will be monitored and will be based solely on merit.

3.5 Training

All employees have equal access to training and other career development opportunities appropriate to their experience and abilities.

3.6 Support for those with disabilities

We are a Disability Confident Employer and are committed to the Sunflower Hidden Disability Scheme. Throughout the employee lifecycle we provide opportunities for employee disclosure of and support for physical and/or psychological disabilities via pre-employment health questionnaires, Occupational Health referrals, reasonable adjustments and Employee Assistance Programme supporting including funded counselling services.

3.7 Carer responsibilities

Colleagues with caring responsibilities for others who are unwell, elderly or disabled, have the full support of the Company. For further information, please see the Special Leave Policy.

3.8 Part-time workers

The Company considers all employees that work less than the full-time equivalent hours within that role as a part-time worker. All part-time workers receive the same treatment and opportunities as full time workers, including but not limited to:

- pay rates (including sick pay, maternity, paternity and adoption leave and pay);
- pension opportunities and benefits;
- holidays;
- training and career development;
- selection for promotion and transfer, or for redundancy;
- opportunities for career breaks.

However, it is important to note that some benefits are applied 'pro rata', in proportion to the hours worked. This applies to but is not limited to pay rates, allowances and holidays.

3.9 Nationality

The Company is proud to employ people across many nationalities and commits that employees from all nationalities will not be subject to detrimental treatment due to their nationality. All colleagues will be treated fairly and consistently.

3.10 Political opinions

The Company acknowledges 'beliefs' as a protected characteristic under the Equality Act 2010 and recognises the right of all employees to have freedom of thought and the freedom to upload ideas and opinions. However, all employees are expected to be respectful and understanding when discussing political subjects among themselves, with customers, clients or any other third party. Employees are expected to be understanding of one and others beliefs and ideals.

When an employee publicised a personal political opinion on social media, please do so on the appropriate platforms and not in a capacity where employees are connected to or representing the Company. Please refer to the Social Media Policy for guidance on sensible social media use.

3.11 Socioeconomic status

The Company commits to providing equal treatment and opportunity to employees, no matter their socioeconomic status. It is the belief of the Company that all employees are unique and offer differing skills, knowledge and experience through their differing experiences and backgrounds. All individuals deserve fair and equal access to any opportunities available.

3.12 Diversity across the Company Board and Senior Leadership Team

The company recognises the importance of diversity across the Company's Senior Leadership team and commits to annually reviewing and analysing the membership of this group to ensure equality of opportunity and diversity.

4 Complaints of discrimination

The Company commits to taking appropriate action concerning all complaints of breaches of this policy made by employees, consultants, agency staff, customers, clients, suppliers and third parties. Complaints will be managed as per the Company's procedures, detailed in the Grievance Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the Disciplinary Policy. Individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under the Company's Disciplinary Policy.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Company takes a strict approach to serious breaches of this policy.

The Company takes a strict approach to serious breaches of this policy and commits to maintaining an inclusive culture where there is zero opportunity for discrimination and harassment year on year.

4.1 Training on equality, diversity and inclusion

The Company has management training in place regarding equality, diversity and inclusion and commits to ensuring all managers have completed this training module. In addition, a further mandatory equality, diversity and inclusion training module will be created and implemented for employees who are not management, to spread awareness and contribute to an inclusive culture.

This training module will be an annual mandatory activity for permanent and temporary employees including senior management. Where appropriate, the Company will make this training available for completion by suppliers, sub-contractors, shareholders & stakeholders and visitors.

4.2 Monitoring equality and diversity

The Company is committed to reviewing the workforce in relation to the Company's equality and diversity practices and to reporting on key metrics on an annual basis.

4.3 Penalties for Violations of Equality and Diversity Practices

Should any employees fail to meet the required standards detailed within this policy, the Company reserves the right to impose penalties upon them. Such penalties will reflect the severity of the breach and can extend to employee sanction, demotion or dismissal.

5 Data Protection

Data collected as part of the Companies equality and diversity monitoring is held securely, accessed by and disclosed to individuals only when required for the improvement of equality, diversity and inclusion processes. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the Company's Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with by way of the procedure detailed in the Company Disciplinary Policy.

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