



GROUP EQUAL OPPORTUNITIES & DIVERSITY POLICY

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

Basis

As an international employer, we have a diverse workforce and endeavour to create an inclusive and supportive working environment in all locations. Our aim is for our workplaces to provide equality of opportunity and be representative of the local labour markets and the communities in which we operate. All employees have a duty to act in accordance with this Policy, to treat colleagues with dignity and respect and to report any behaviour that breaches this Policy.

Principles

This Policy applies in all our operations throughout the Group, although it does not form part of any employee's contract of employment. This Policy covers all employees as well as directors, officers, consultants, contractors, casual workers, agency staff (collectively referred to as 'Employees' or the 'Workforce') and job applicants in addition to applying to all employment related activity.

Adoption

This Policy has been adopted by the Group and will be updated or modified as appropriate.

Implementation, Roles and Responsibilities

The Executive Committee of Hill & Smith PLC has overall responsibility for ensuring that the Group's operating companies comply with this Policy and that the Group's operating companies act ethically towards employees and the environment.

The senior leadership teams of each operating company are responsible for ensuring the employees of their business understand and comply with this Policy.

Directors and managers have a specific responsibility to set an appropriate standard of behaviour and to ensure 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 organisation and that the Policy is implemented and complied with.

Every individual in the Group has a personal responsibility to familiarise themselves with this Policy and to act in accordance with its provisions. Any employee can be held liable for inappropriate behaviour towards colleagues under this Policy, both individually and with the employer.

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 individual operating company's disciplinary policy and procedure.

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

Definitions

The organisation has a legal responsibility to prevent harassment and other unacceptable behaviours on the grounds of protected characteristics, which may vary from country to country or from state to state. The definitions of protected characteristics include, but are not limited to, age, sex/gender, disability, marital or civil partner status, pregnancy or maternity, colour, race, nationality, ethnic or national origin, religion or belief, sexual orientation, gender reassignment, and any other characteristic protected by applicable law in the relevant jurisdiction.

Discrimination is less favourable treatment of a person or persons that cannot be justified, and the following matters may represent potential breaches of this Policy: discrimination; victimisation; harassment and bullying. This includes, but is not limited to, unwelcome verbal, non-verbal, physical, or online conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.



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Recruitment & Selection

The Group and its operating companies will ensure equal opportunities to all 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, operating companies should refer to the Group's Inclusive Hiring Guide.

Employment decisions and succession plans are based on merit, qualifications, experience, performance, and business needs with consideration of each individual's unique set of skills and abilities.

Career Management

All 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 planning and leadership development decisions will be based on demonstrated performance, potential, readiness, qualifications, and business needs.

Monitoring

The Group may evaluate and monitor the make-up of the workforce in relation to protected characteristics in order to encourage equality and acceptance through the Group.

Violations

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. No individual will be subjected to any detriment or retaliation for raising a complaint in good faith under this Policy. If this is not possible, the following options also apply.

A grievance can be raised formally under the individual operating 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 to the full extent possible and investigated. Employees who make such allegations in good faith will not be treated less favourably as a result.

Employees are encouraged to use the 'Speak Up' hotline, a confidential mechanism hosted by Navex Global for raising concerns about the workplace. This is a confidential helpline at <https://hsgroup.ethicspoint.com>.

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 sexual harassment.

Associated Documents

- Code of Business Conduct
- Dignity at Work Policy
- Whistleblowing Policy
- Inclusive Hiring Guide

Other Contacts

- Your Managing Director/Local Finance Director
- Group Company Secretary
Tel: +44 (0)121 704 7430
Email: compliance@hsgroup.com