

SMITH'S (GLOUCESTER) LIMITED The "Employer"

***EQUALITY, DIVERSITY & INCLUSION (E.D.I.) POLICY***

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The Company is committed to promoting equality, diversity and inclusion in the workplace for all staff and job applicants. We aim to create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

We will recruit, train, develop and promote on the basis of merit, skills, qualifications and abilities alone. Where a decision needs to be made, whether it is regarding pay rises and bonuses, promotion or disciplinary action, this will only ever be based on an individual's performance and contribution to the organisation. This policy is in accordance with the Equality Act 2010 and any other associated legislation.

**Key Principles**

**Equality:** Every individual is treated fairly and without discrimination.

**Diversity:** We celebrate diversity in all its forms and welcome individuals from various backgrounds, perspectives, and abilities to enrich our workplace.

**Inclusion:** All employees feel respected, supported and empowered to contribute fully.

We do not discriminate against staff based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation (**protected characteristics**).

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

All staff have a duty to act in accordance with this policy and must always treat colleagues with dignity and respect and not discriminate against or harass any other members of staff, regardless of their status. Your attention is drawn to our separate Anti-harassment and Bullying Policy and our Sexual Harassment Prevention Policy.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

**Who is covered by the Policy?**

This policy covers all individuals working at all levels and grades, including employees, consultants, contractors, trainees, home-workers, part-time and fixed-term employees, casual workers and agency staff (collectively referred to as **staff** in this policy).

**Personnel Responsible for Implementation of the Policy**

The Company Secretary has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives regarding equal opportunities. Managers will be given appropriate training on

**Approved by The Board of Directors**

**Signature:**

A handwritten signature in blue ink, appearing to read "Alan Smith".

**Alan Smith, Managing Director**

**Dated: 5<sup>th</sup> January 2026**

equal opportunities awareness and equal opportunities recruitment and selection best practice. The Company Secretary has overall responsibility for equal opportunities training.

If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact the Company Secretary to request training or further information.

### **Scope and Purpose of the Policy**

This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

### **Forms of Discrimination**

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect, and it may occur intentionally or unintentionally.

Direct discrimination occurs when someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that 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 and our Sexual Harassment Prevention Policy.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

### **Recruitment and Selection**

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Short listing of applicants should be done by more than one person wherever possible.

Job advertisements should avoid stereotyping or using wording that may discourage

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groups with a particular protected characteristic from applying.

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, the Company Secretary may approve the use of lawful exemptions to recruit someone with a particular protected characteristic – The Company will ensure that any restriction is **proportionate** and that there is no other, less discriminatory way to achieve the same aim.

The advertisement should specify the exemption that applies.

Applicants should not be asked about health or disability before a job offer is made although there are limited exceptions which should only be used with the Company Secretary's approval.

**For example:**

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the decision-making process).

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the Company Secretary (who should first consider whether such matters are relevant and may lawfully be taken into account).

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should 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. The list of acceptable documents is available from the Company Secretary or the UK Border Agency.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before short-listing and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

**Staff Training, Promotion and Conditions of Service**

Staff training needs will be identified through regular staff appraisals and informal meetings. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made based on merit.

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**Alan Smith, Managing Director**

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Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

### **Termination of Employment**

The Company will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

### **Disability Discrimination**

If a member of staff is disabled, or becomes disabled, they are encouraged to tell the Company about your condition. This is to enable the Company to support you as appropriate.

If staff experience difficulties at work because of a disability, they may wish to contact their manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Company will consider the matter carefully and try to accommodate any needs, within reason. If it is considered that a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether disabled workers, job applicants or service users are at a substantial disadvantage compared to other staff. Where possible and proportionate, we will take steps to improve access for disabled staff and service users.

### **Fixed-Term Employees**

The Company monitors the use of fixed-term employees, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

### **Part-Time Workers**

The Company monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

### **Breaches of the Policy**

If a member of staff feels that they may have been discriminated against, they are encouraged to raise the matter through the Grievance Procedure. If they believe that they may have been subject to harassment, they are encouraged to raise the matter through the Anti-Harassment and Bullying Policy or the Sexual Harassment Prevention

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**Policy.** If staff are uncertain which applies or need advice on how to proceed, they should speak to their Line Manager.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff 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 our Disciplinary Procedure.

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

### **Review and Monitoring of the Policy**

The Company will continue to review the effectiveness of this policy to ensure it is achieving its objectives.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting their manager.

**Approved by The Board of Directors**

**Signature:**

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**Alan Smith, Managing Director**

**Dated: 5<sup>th</sup> January 2026**