



Corporate Governance

Group Diversity and Inclusion Policy



INTRODUCTION

We are committed to developing a working environment that is fair and inclusive, enabling all employees to make individual and valuable contributions to the business. We are also determined to ensure that we extend this same openness to all our customers, suppliers, business partners and the communities in which we operate.

All of our employees throughout the Group are expected to help to create a positive working environment by supporting colleagues and treating others with respect, dignity and courtesy. We expect our managers to exercise leadership in this field by discouraging prejudice, and to lead by example through their own behaviour.

This policy outlines our approach to Diversity and Inclusion within the Group and what we expect of all employees to support and uphold our principles.

It applies to all employees across the Group. Where there are local legal or regulatory requirements, local requirements will take precedence. However, the policy must be applied across the Group in all other circumstances.

The policy also applies to contractors, agents, consultants or any others working for or on behalf of SIG plc.

In this document 'SIG' refers to SIG plc and its affiliate companies. 'Our' and 'we' refers to SIG plc.

PRINCIPLES

Diversity and Inclusion is about recognising and harnessing the value that individual differences bring to the organisation. As an international employer, we celebrate our diverse workforce and the benefits that this brings in achieving our goals.

The key principles of our approach are to:

- encourage, promote and maintain an inclusive and supportive work environment, which reflects the rights of individuals to be treated fairly and with respect and enables them to fulfil their potential
- recruit, develop and retain talent based on skills, qualifications, experience, performance, behaviours and achievements, using clearly defined, fair and inclusive criteria
- invest in employee development, treat employees fairly and equally and encourage an honest and open culture, which values differences
- support employees to work in a way that suits their circumstances by supporting flexible working, offering part-time roles and encouraging job-sharing opportunities and shift swapping where this is possible
- develop policies and practices to direct and guide the way in which we conduct ourselves both within the organisation and with our external stakeholders, which make our principles and expectations clear, deliver fairness and consistency of approach, and value individuality
- understand our customers and the communities in which we operate to deliver excellent service to our increasingly diverse customer base

- ensure that all SIG employees are aware of their rights and their responsibilities in relation to diversity and inclusion
- encourage leaders, employees and our external partners and stakeholders to make a positive difference through proactively supporting our diversity and inclusion principles

RESPONSIBILITIES

Employee responsibilities

It is the responsibility of all employees to promote a culture and approach to our work that supports our principles of diversity and inclusion.

As an employee you are expected to:

- understand and comply with the policy and report any incidents or alleged incidents that would be considered a breach to your line manager or HR Representative
- promote our principles of diversity and inclusion, and speak up if you see or hear something that you believe is not in line with our expectations
- raise any potential issues of discrimination, victimisation, bullying or harassment with the person against whom you have the complaint. Any employee raising a concern in an attempt to resolve a matter as an alternative to a formal process will be supported.
- be aware that you can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.

Management responsibilities

As a manager you are expected to:

- ensure the policy is implemented, employees are trained against it and comply with it
- take responsibility by discussing and resolving any allegations you are made aware of against a colleague or a member of the public associated with SIG with the complainant
- ensure further advice, support and training is requested from the HR team as required.

UNACCEPTABLE CONDUCT, BULLYING AND HARASSMENT

To promote and maintain a diverse and inclusive working environment that allows all employees to feel valued, it is important that we are all aware of behaviours that may constitute harassment, bullying or unacceptable conduct that may have a negative impact on an individual.

Unacceptable conduct

Conduct that is deemed unacceptable includes, but is not limited to:

- unwelcome physical contact, comments, looks, innuendos of either a personal or suggestive nature which cause offense

- any form of victimisation, physically or mentally, on the grounds of sex, ethnic origin, nationality, colour, creed, age, sexual orientation, physical or mental disability, illness/medical condition, religious or similar beliefs, whether the grounds are actual or assumed
- offensive language or behaviour including jokes and insults
- display of visually offensive material, including that of a sexual nature
- sexual advances, including favours from an individual in authority in relation to another individual's job content and career progression
- intimidating or humiliating behaviour

Bullying

The term 'bullying' is often associated with persecution or oppression by either force or threat, however, the majority of bullying within the workplace occurs at a much lower level, which can be described as continually or repeatedly troubling or annoying an individual.

The types of behaviour that may constitute bullying, and are unacceptable, irrespective of the circumstance, include, but are not limited to:

- constant, unwarranted criticism or ridicule, especially where this occurs in front of or in earshot of other employees, for example in a meeting
- insulting remarks or unfounded threats
- undermining an individual or group of employees through overloading them with too much work
- preventing an individual from having access to development or promotion opportunities

Harassment

The term 'harassment' constitutes unwanted conduct towards an individual that leads to:

- the violation of their dignity or
- the creation of an intimidating, hostile, degrading, humiliating or offensive environment.

Issues or complaints of unacceptable behaviour, bullying or harassment can be of a sensitive or personal nature. Regardless of whether unacceptable behaviours are intentional or unintentional, it is important to remain mindful that what doesn't cause offense to one person may do so to another.

MEASURES

The company aims to:

- ensure that our employment policies and practices are compliant with current legislation and related Country Directives and Acts
- communicate our commitment to diversity, inclusion and equal opportunities to all our employees
- develop and maintain a working environment which is free of discrimination, bullying and harassment

- recruit the most capable individual for each job regardless of their background
- ensure that access to training, development and promotion is based solely on merit
- ensure that a course of action exists so that any employee, who feels they have experienced unfair treatment at the hands of either the company or a colleague, can readily have their concern addressed
- train employees in our Diversity and Inclusion expectations.

REPORTING UNACCEPTABLE CONDUCT

Employees who raise a genuine concern or complaint under this policy will not, under any circumstances, be subjected to any unfavourable treatment or victimisation as a result, whether they are raising a concern on their own behalf or for someone else.

However, if it is established that an employee has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action may be taken against that employee.

Our principles on unacceptable behaviour, bullying and harassment also extend to our third party partners, for example customers, suppliers, visitors and other associates. Employees should report any unacceptable conduct, bullying or harassment by third parties to their manager who will take appropriate action.

FURTHER GUIDANCE AND SUPPORT

If you have any questions on the content of this policy, or need further guidance or support, please contact your local HR Representative. You can also find further information on raising concerns in:

- Group Whistleblowing Policy
- Local grievance policy

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