



Corporate Governance

# Group Diversity, Equality and Inclusion policy

<b>Owner</b>	Group Chief People Officer
<b>Last reviewed</b>	November 2022
<b>Version</b>	4

## INTRODUCTION

We are committed to developing a working environment that is fair and inclusive, so employees can feel safe, proud and valued and enabled to make individual and valuable contributions to the business. We are determined to ensure that we extend the same openness to all our customers, suppliers, business partners and the communities in which we operate.

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

This policy outlines our commitments and approach to Diversity, Equality and Inclusion across the Group and what we expect of all employees to support and uphold our principles and achieve our commitments. It applies to all employees across the Group. Where there are local legal or regulatory requirements, local requirements will take precedence. The policy, however, 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.*

## DEFINITIONS

**Diversity** refers to the various ways in which individuals differ and ensuring the representation of these groups across the organisation. These can include differences such as gender, ethnicity, race, disability or age in addition to nationality, educational background, personality type, religion, sexual orientation or life experience.

**Equality** refers to the process of ensuring that processes, policies, programmes and ways of working are impartial, fair and provide equal opportunities for every individual.

**Inclusion** refers to the practices and policies that help to create a sense of belonging in the workplace. It is the right for all to be treated fairly and with respect, ensuring every individual feels valued and confident to be themselves.

## VISION AND COMMITMENTS

Our vision is to enable a working environment that is fair and inclusive, so employees can feel safe, proud and valued.

Our commitments underpin our vision. We will:

1. Create an inclusive environment where everyone is listened to, treated fairly and with respect.
2. Ensure our ways of working, processes and policies are clear, impartial and fair.
3. Create opportunities to improve the diversity of our workforce across all areas of the business.

## PRINCIPLES

Diversity, Equality and Inclusion is about celebrating, recognising and harnessing the value that individual differences bring to the organisation and making sure everyone feels included and has a sense of belonging and is treated fairly.

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 our culture and both our values and behaviours, providing employee learning, development and coaching to encourage an honest and open culture, which values difference
- support employees to work in a way that suits their circumstances, experience, background, abilities and culture and in a way that supports good mental health and wellbeing
- develop policies, processes and practices that direct and guide how all employees should conduct themselves both within the organisation and with our external stakeholders and partners, which make our principles and expectations clear, deliver fairness and consistency of approach, and value individuality

- carry out initiatives and activity to address under-representation in our workforce.
- understand our customers, suppliers, business partners and the communities in which we operate to deliver excellent service to our increasingly diverse stakeholder base
- ensure that all SIG employees are aware of their rights and their responsibilities in relation to diversity, equality and inclusion and encourage them to make a positive difference through proactively supporting these principles

## RESPONSIBILITIES

### **Employee responsibilities**

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

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, equality and inclusion, and feel empowered to 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 your line manager or your HR representative. 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 and leadership responsibilities**

As a manager you are expected to:

- ensure the policy is implemented, employees understand and are trained against it and comply with it
- promote and support a culture of inclusion and belonging by ensuring everyone is listened to, treated fairly and with respect
- develop and support initiatives which support the Diversity, Equality and Inclusion vision and commitments
- lead by example through your behaviour

- 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 are requested from the HR team as required

## UNACCEPTABLE CONDUCT, BULLYING AND HARASSMENT

To promote and maintain an inclusive working environment that allows all employees to feel safe, proud and 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 age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, health and mental health.
- making general assumptions about a person's capabilities, characteristics and interests
- language or behaviour that could be considered offensive or stereotypical including jokes, 'banter' and insults
- display or sharing of material that could be considered visually offensive, including that of a sexual nature
- sexual advances and/or favours from an individual in authority
- behaviour that could be considered as intimidating or humiliating

### 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, whether directly or 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:

- develop and enable a supportive working environment that is fair and inclusive, so employees can feel safe, proud and valued and enabling all employees to make individual and valuable contributions to the business
- extend our approach to all our customers, suppliers, business partners and the communities in which we operate.
- promote the health and wellbeing of all employees and support employees who experience any mental health issues or are experiencing stress outside work
- ensure that our employment policies and practices are at a minimum, compliant with current legislation and related Country Directives and Acts
- communicate and demonstrate our vision, commitments and principles to diversity, equality and inclusion to all our employees
- develop and maintain a working environment which is free of prejudice, discrimination, bullying and harassment
- recruit and promote the most capable individual for each job regardless of their background and ensure that our recruitment process is fair, transparent and accessible

- ensure that access to training, development and promotion is based solely on merit and remains accessible to all individuals across the business
- 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
- ensure our employees are aware, understand and support the Diversity, Equality and Inclusion policy and practices
- regularly review the policy (and all associated policies) and amend/update as necessary

## RECRUITMENT AND SELECTION

Our recruitment and selection policies, processes and materials are an important part of our approach to Diversity, Equality and Inclusion. We therefore require all those involved in recruitment decisions to have appropriate and up to date training where this is available and ensure we promote equality, encourage diversity and demonstrate an inclusive environment throughout all aspects of our recruitment and selection process.

All recruitment advertising, whether internal or external must not indicate or appear to indicate an intention to unjustifiably discriminate on the grounds we have identified within this policy. This means, for example, thinking carefully before being too specific on the criteria for experience and qualifications, or working hours and times.

We should not confine our advertising to areas, publications or sites which would undermine, intentionally or otherwise, our aim to attract diverse applicants.

## PERFORMANCE MANAGEMENT

The principles of this policy apply to performance management, talent management, succession planning and other career and development opportunities.

All processes and practices related to these areas of the employee life cycle should be based solely on merit and evidence. It should not be based on stereotypes or assumptions, and tailored to ensure that all processes and programmes provide equitable outcomes for every individual.

## PAY AND REWARD

Our approach to pay and reward is transparent and based on objective and consistent criteria. This includes a commitment to transparency and fairness in the allocation of bonuses, allowances and any other aspects of reward and remuneration.

We will continue to undertake regular equal pay audits and related equality pay gap assessments where we are required to comply with required external reporting.

## 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.

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 feel empowered to report any unacceptable conduct, bullying or harassment by third parties to their manager who will take appropriate action.

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.

## 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
- Group Health and Wellbeing Policy
- Group Code of Conduct Policy
- Local disciplinary and grievance policies
- Local anti-bullying and harassment policies