

## Equality, Diversity and Inclusion policy

### 1. Overview:

- 1.1 This policy covers all aspects of how you are treated by the Company and everybody we employ. It covers (but is not limited) to:
- recruitment.
  - pay and conditions of employment.
  - training and continuing professional development.
  - promotion.
  - appraisals.
  - grievances and disciplinary matters.
  - ending employment.
  - giving references.
  - how visitors are treated.
  - how clients and suppliers are treated; and
  - how any other business contacts and associates are treated.
- 1.2 This policy applies to all employees, apprentices, consultants, officers, contractors, interns, volunteers, job applicants, agency, and casual workers.
- 1.3 If you are an employee, this policy does not form part of your contract of employment, and we may amend it at any time.
- 1.4 You should read this policy in conjunction with our other policies, including Harassment and Bullying, and our Grievance Policy.

### 2. Our equality, diversity and inclusion commitment and aims:

- 2.1 We will not tolerate discrimination or harassment and are committed to promoting equality, diversity and inclusion in employment. Those who work for us, and anyone applying for a job with us, will receive fair and equal treatment, in accordance with the Equality Act 2010.
- 2.2 We take reasonable steps to prevent sexual harassment in the workplace, including harassment by third parties (for example clients, customers, suppliers and contractors). This includes maintaining clear standards of behaviour, [providing appropriate training], encouraging early reporting, investigating concerns promptly, and taking action where issues are identified.
- 2.3 We ensure, where possible, full access for everyone applying for a vacancy. Decisions about transfers and internal promotions are made, so far as possible, using only objective criteria.
- 2.4 We will never victimise anyone who makes a legitimate complaint to us about harassment or discrimination, or who supports a colleague in their complaint.
- 2.5 This policy is underpinned by the following further commitments and aims:

- A working environment free from all forms of unlawful discrimination, including victimisation and all forms of harassment.
- A workplace capable of allowing everyone to achieve their greatest potential, and where individuals are willing to give their best.
- A Company-wide understanding of the message promoted by this policy.
- A commitment to ensuring all staff understand their rights and responsibilities under this policy — if you are not sure what we consider acceptable and unacceptable, you should check with your manager.
- A policy ensuring employment opportunities are open to all qualified candidates, so that we recruit from the largest possible pool of available talent and recruit the best-qualified individual.
- A commitment to recruiting based on ability to do the job, that also reflects the multicultural composition of our local community.
- A commitment to amending this policy if we think it has become outdated, or circumstances suggest to us that it needs updating.
- A commitment to protecting staff, wherever possible, from being victimised or treated less fairly if they make or support a complaint in good faith under this policy.

### 3. How the law defines discrimination

3.1 The following list gives you a general description of the types of acts that may both breach this policy and be unlawful. Sometimes actions can be intentional, and sometimes unintentional. We include examples of both types in this list:

- **Direct discrimination:** this is when somebody is treated less favourably because of a protected characteristic than somebody else has been, or would have been, in identical circumstances.
- Examples: rejecting a job applicant because of their race or refusing to promote someone because they are pregnant.
- **Indirect discrimination:** this is when a group of people with one of the protected characteristics (subject to a couple of exceptions) is put at a disadvantage by a provision, criterion or practice applied to all staff unless the treatment is justified for a good business reason.
- Examples: refusing a request to work part-time without a good business reason (which indirectly discriminates against women, who are more likely to have childcare responsibilities); insisting all staff work Saturdays without a good business reason (which indirectly discriminates against Jewish employees, who may not be able to work on the Jewish Sabbath).
- **Associative discrimination:** this is where somebody is treated less favourably because of the personal characteristics of somebody else.
- Example: treating an employee less favourably because their parents are Jehovah's Witnesses.
- **Perceived discrimination:** this occurs where someone is treated less favourably because someone wrongly believes they have a particular protected characteristic.

- Example: treating an employee less favourably because someone thinks he is gay, when in fact he is not gay.
- **Harassment:** this is when a hostile, humiliating, degrading, intimidating or similarly offensive environment is created in relation to a protected characteristic. We also consider it harassment for a worker to be subjected to uninvited conduct related to a protected characteristic that — as an intended or unintended consequence — violates their dignity.
- Examples: name calling, lewd comments, excluding colleagues and making insensitive jokes are all examples of harassment. We deal in detail with this under our separate policy on Harassment and Bullying.
- **Sexual Harassment:** this is unwanted conduct of a sexual nature, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating a person less favourably because they have submitted to or refused to submit to unwanted behaviour of a sexual nature, or that is related to gender reassignment or sex. The law (Equality Act 2010) protects the following people against sexual harassment in the workplace: Employees and workers, agency workers, volunteers and contractors in all areas of our organisation.  
Along with harassment, it does not need to occur in person. It can happen via digital means, including social media sites or channels e.g. WhatsApp. A person may be sexually harassed, even if they were not the target of the behaviour.
- Examples: sexual comments or jokes, which may be referred to as 'banter'. Displaying sexually graphic pictures, posters or photos. Unwanted touching, pinching, pushing and grabbing. Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome. Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless), or offensive emails, text messages or social media content.
- **Victimisation:** in a legal context, 'victimisation' has a much more restricted meaning than in real life. It happens when a worker has complained about harassment or discrimination, or has supported a colleague in their complaint, and is then treated less favourably as a result.
- Examples: an employee who is 'sent to Coventry' because they spoke up on behalf of one of their colleagues in a harassment investigation, or an employee who is dismissed under a pretext because they have complained of discrimination.

### 3.2 The 'protected characteristics' are:

- age.
- race (which includes colour and ethnic/national origin).
- disability.
- religion or belief (which includes non-belief).
- sex.
- gender reassignment.
- pregnancy or maternity.
- sexual orientation; and
- marital or civil partnership status.

3.3 There are other actions which can be unlawful under the Equality Act 2010. Examples include:

- failure to make reasonable adjustments to minimise certain disadvantages suffered by a disabled employee (or job applicant).
- instructing another person (or applying pressure on them) to discriminate.
- knowingly assisting somebody else when they carry out a discriminatory act.
- discriminating against somebody believed to have a protected characteristic, whether they do, or because they associate with a third party who does.

#### **4. How we carry out our responsibilities and duties**

- 4.1 Management and the wider workforce are essential to ensuring the success of this policy. We all have a legal responsibility to comply with it, and any of us — however senior or junior, we can be held personally liable for unlawful discrimination if we breach its terms.
- 4.2 Overall responsibility for the effective implementation and operation of the policy lies with management, specifically with the Board of Directors. Everyone working at managerial level is expected to act in full accordance with this policy, lead by example, and attain and maintain appropriate standards of behaviour within the teams they manage.
- 4.3 The ethos and standards covered by this policy can only be achieved and maintained if everyone in our workforce cooperates fully. It is important to understand that you have a legal responsibility to comply. If you breach this policy, you may also make the Company liable for your actions, and we may both have to pay compensation to anyone who claims against us. We expect you to take personal responsibility for adhering to this policy's aims and commitments and for drawing any actual or potential breaches to our attention.
- 4.4 We provide equality, diversity and inclusion training to staff as appropriate. This includes induction training for new starters and refresher training for staff and managers, particularly those involved in recruitment, performance management, grievance/disciplinary processes and restructuring decisions.
- 4.5 We also encourage everyone who works for us to help promote equal opportunities across the Company. Please contact your manager if you have any ideas about how we could do this better, or you would like to be more involved in achieving this policy's aims.

#### **5. How we recruit, promote, and make other selections**

- 5.1 We carry out all recruitment, promotion, and other types of selection procedures, such as redundancy selection processes, based on merit, using non-discriminatory and as far as possible, objective criteria.

- 5.2 Advertisements for vacancies must not include wording that may discourage some groups of people from applying, or stereotype in any way, and they must be placed where they can reach as wide and diverse a pool of potential candidates as possible.
- 5.3 Nobody applying for a job with the Company may be asked about their health, attendance record, or whether they have a disability, before a job offer is made - except in very limited situations. It may, for example, be justifiable to ask whether the applicant needs any disability-related measures put in place for the interview, or to check that they can carry out a key part of the job. It is acceptable to make some job offers dependent on a medical examination.
- 5.4 It is unlawful to ask job applicants anything that might suggest an intention to discriminate on the grounds of a protected characteristic. Asking an applicant about their religion when they are applying for a job that involves weekend working would not, for example, be allowed. Nor would asking an applicant whether they have childcare responsibilities be allowed, as that suggests you might be intending to indirectly discriminate on grounds of sex or marital status.
- 5.5 It is fine to include certain health or disability questions in equality, diversity and inclusion monitoring exercises, but the data gathered must not be used for selecting someone for a role, or in making other employment-related decisions.
- 5.6 If you have a disability (including an invisible disability) and need workplace adjustments, speak to your manager or HR. We will consider requests promptly and may seek medical advice where appropriate.

## **6. How we enforce this policy and handle breaches**

- 6.1 We will investigate any complaint or allegation you raise regarding a potential breach of this policy. If you believe you have been harassed or discriminated against you should contact your manager as soon as possible. If your concern relates to your manager, or you would prefer not to speak to them, you can raise it with [HR or the Managing Director]. If you are an employee, you may also raise a complaint under our formal grievance and or Harassment and Bullying procedure.
- 6.2 You will face disciplinary action if we find you have harassed or discriminated against anyone else in breach of this policy. Sometimes this type of behaviour may amount to gross misconduct, in which case you may be dismissed without notice.
- 6.3 Occasionally, people make complaints knowing they are not true. They might do this to avoid or deflect disciplinary action. We view any complaint made in bad faith as an act of misconduct and this will normally lead to disciplinary action. In some cases, bad faith complaints may lead to summary dismissal for gross misconduct.

## **7. How we monitor whether this policy is working**

- 7.1 We may record and analyse information about equality, diversity and inclusion information in accordance with data protection law and our privacy notice. This monitoring helps us identify and address any barriers to equality of opportunity within our workforce. Where we collect special category data (for example relating to health, ethnicity, religion or sexual orientation)

this will be handled sensitively, used for monitoring and improving equality of opportunity, and shared only where necessary.



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**29/1/26**

| Rev No | Issue Date | Rev Description                                           | Prepared        | Checked | Approved |
|--------|------------|-----------------------------------------------------------|-----------------|---------|----------|
| A1     | 27/09/17   | General issue                                             | RJ              | BV      |          |
| P1     | 15/10/21   | Preliminary Issue for comment                             | TB (Advo Group) |         |          |
| P2     | 23/10/21   | Amended in accordance with received comments              | TB (Advo Group) | ME/ RH  | ME       |
| R1     | 20/11/24   | Amended in accordance with recent changes in legislation. | WH              | SMcC    | GE       |
| R2     | 29/1/2026  | Annual/Periodic Review with changes                       | NK              | WH      | GE       |
|        |            |                                                           |                 |         |          |