



Diversity and Inclusion Policy

Version 1.0

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Version Control

| Version | Owner | Reviewer | Changes | Approval date | Next Review |
|---------|-------------------|--------------|--|---------------|-------------|
| 1.0 | Monica Whitefield | Lyca Amichia | Initial version or first version uploaded on portal - see ESG share for historical information | 07/2021 | 03/2022 |

Principles

Newable welcomes the diversity of its employees and is committed to the principles of diversity, inclusion and equality of opportunity. We value and promote:

- attracting employees from all sections of the community;
- identifying, using and developing the skills and talents offered by employees and potential employees of the Group, to the benefit of individuals and the company;
- the awareness that unlawful discrimination is wasteful of skills, talent and creativity.

We recognise the negative impact on employees of the effects of discrimination on achievement of objectives, personal and company morale, career progression, self-fulfillment and self-esteem.

All employees and those acting on behalf of the Group are personally responsible for upholding this policy, and must refrain from taking any action or decision which is contrary to the letter or the spirit of this policy.

The senior person with responsibility for the effective implementation of this policy is the Chief Executive Officer.

This policy is updated regularly in line with legislation, and reviewed annually.

Policy

We seek to ensure that no job applicant or employee receives less favourable treatment on the grounds of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, or any other unlawfully discriminatory grounds such as trade union membership or part-time working status. We will not disadvantage applicants, employees or any others working on behalf of the company by imposing unjustifiable provisions, criteria or practices.

This Diversity and Inclusion Policy is communicated to all employees through the Employee Handbook, which is available to all on the intranet. The policy is introduced to new employees to the Group, normally during induction.

Unlawful discrimination

We will not, during recruitment, selection, training, promotion, disciplinary, dismissal or any other employment activity:

- a. Treat any individual less favourably than others on any unlawfully discriminatory grounds;
- b. Impose on any individual a provision, criterion or practice that unlawfully disadvantages an individual when compared with others;
- c. Discriminate unlawfully against any individual because of his or her association with someone who has a protected characteristic.

Harassment, bullying and victimisation

We will not subject any individual to harassment, bullying or victimisation:

- a. Harassment is unwanted conduct affecting the dignity of men and women in the workplace. It may be related to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation or any other protected characteristic of the individual, and is unlawful whether persistent or an isolated incident. Harassment is demeaning and unacceptable to the recipient.
- b. Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.
- c. Victimisation occurs when an individual is treated less favourably for having made an earlier claim of discrimination or harassment in good faith.

The Group upholds a separate Anti-harassment and Bullying Policy, and a separate

Recruitment and Selection Policy, which are compliant with this Diversity and Inclusion Policy.

Employer responsibilities

The Group ensures that:

- a. no job applicant or employee will receive less favourable treatment or be placed at a disadvantage on grounds which are not related to his or her ability to do the job (assisted if appropriate by reasonable adjustments);
- b. this policy is upheld regardless of the source of potential candidates (e.g. through an agency, or by response to an advertisement);
- c. all recruitment advertisements include a statement that Newable is an equal opportunities employer;
- d. it regularly monitors its progress in achieving equality of opportunity and managing diversity.

Individual responsibilities

Employees and all others acting on behalf of the Group:

- a. must actively promote the principles of diversity and inclusion and strive to create an environment in which objectives may be pursued without fear or intimidation;
- b. must not discriminate unfairly in the way they provide or procure services on behalf of the Group;
- c. must not discriminate unfairly in the recruitment, promotion and management of employees;
- d. must not encourage other employees to practice unfair discrimination or harassment;
- e. must not victimise any person who has complained of harassment or unfair discrimination, or who has given information in connection with such a complaint.

Complaints and grievances

Any individual who is unhappy about the behaviour of a colleague should discuss it immediately with his or her line manager or (if the complaint is about the line manager) with the line manager's manager. All complaints and grievances will be taken seriously, and immediate steps will be taken to investigate the complaint through the Group's Anti-harassment and Bullying Policy. Confidentiality will be maintained as far as possible within the boundaries of the investigation.



After investigation, any breach of this Diversity and Inclusion policy which is found to have occurred will be addressed through the Group Disciplinary Policy and may result in summary dismissal.