

## Introduction

Our organisation is made up of great people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations and we value this diversity.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences, and skills. We believe that this creates a happier, more productive working environment for us all.

### To support this inclusive culture, this policy:

- Outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice.
- Explains the behaviours we expect of our people in support of this commitment and, sets out the key steps we take to make our culture as inclusive as possible, and how we ensure equality of opportunity throughout the employment lifecycle.

### This policy accompanies the following documents:

- Code of Business Ethics
- Company Vision and Values
- Bullying and Harassment Policy

All these documents guide our conduct and behaviour and set the standards that the Company expects all our employees to maintain.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

## Scope

This policy applies to anyone working for us. This includes employees, workers, contractors/freelancers, volunteers, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

## Our commitment to you

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, victimisation, bullying or harassment.

We aim to ensure that our recruitment, promotion, and employment practices are fair, transparent and non-discriminatory.

We will endeavour to communicate our commitment to Equality, Diversity and Inclusion to our clients and suppliers and take care to ensure, as far as reasonably practicable, that our employees are not subject to discrimination by third parties.

## What we expect from you

We expect all our employees to take personal responsibility for upholding, promoting, and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

We expect you to treat your colleagues and third parties (including clients, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues, or third parties must be free from any form of discrimination, victimisation, bullying or harassment.

If any of our employees is found to have committed, authorised or condoned an act of discrimination, victimisation, bullying or harassment, we will take disciplinary action under our Disciplinary Procedure. You should be aware that you can be personally liable for discrimination and harassment.

## Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others in the same circumstances on the grounds of one or more "protected characteristics".

These protected characteristics are defined in the Equality Act 2010":

- Disability;
- Sex;
- Gender reassignment;
- Marital or civil partnership status;
- Race;
- Religion or belief;
- Sexual orientation;
- Age;
- Pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

Different types of unlawful discrimination are detailed under the Equality Act 2010:

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled, and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
  - Dismissing or failing to pay a bonus to someone because of their disability-related absence; or
  - Disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having a serious health condition, such as cancer.
- **Failing to make reasonable adjustments for disabled people:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful.

## Reasonable adjustments may include:

- Making adjustments to premises;
- Re-allocating some or all of a disabled employee's duties;
- Changing their working hours or place of work;
- Adjusting procedures for assessing job candidates;
- Transferring a disabled employee to a role better suited to their disability;
- Giving a disabled employee time off work for medical treatment or rehabilitation;
- Providing training or mentoring for a disabled employee;
- Supplying or modifying equipment, instruction and training manuals for disabled employees; or

- Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company
  - Trade Union Membership: It is prohibited to discriminate against people on the grounds of membership/non-membership of a trade union.
  - Rehabilitation of Offenders: It is prohibited to discriminate against people who have a spent conviction as set out in the Rehabilitation of Offenders Act 1974.

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- Using different standards for different groups of employees to judge performance.

## Harassment and Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- Violating someone else's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

### Sexual harassment is:

- Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our Bullying and Harassment Policy for further information on our procedure for reporting harassment.

## Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

## Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our Bullying and Harassment Policy for further information on our procedure for reporting bullying.

## OUR APPROACH TO ACHIEVING EQUALITY, DIVERSITY AND INCLUSION

### Monitoring

We analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equality, diversity and inclusion strategy.

All employees and job applicants will be asked to complete an Equality, Diversity and Inclusion form. The Company guarantees that this information will only be used for the purpose of monitoring the effectiveness of its Equality, Diversity and Inclusion Policy and in order to take such lawful positive measures as appropriate to redress any imbalance in our workforce.

To ensure the effective operation of the Equality, Diversity and Inclusion Policy (and for no other purpose) the Equality Monitoring Form will be retained in employees' personnel files. Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly limited.

### Recruitment, Advertising and Selection:

- CML will take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible and will endeavour to employ a workforce that reflects the diverse community at large.
- No job applicant or employee will receive less favourable treatment on the grounds of one or more of the protected characteristics or membership/non-membership of a trade union.
- No job applicant or employee will be disadvantaged by any conditions or requirements that cannot be shown to be justifiable. The Company will provide clear and justifiable job criteria, which are demonstrably objective and job-related.
- The Company will not use pre-employment health screening, questionnaires or questioning for any job position unless any such use for a particular position has been expressly authorised in advance as justifiable by the Managing Director. Completion of a pre-employment health questionnaire will only be required after an offer of employment has been made.
- Recruitment and selection criteria and all procedures relating to the assessment of employees or potential employees will be regularly reviewed to ensure they are non-discriminatory.
- The Company will be flexible making reasonable adjustments for the provision of environment/interview conditions where required.
- All employees involved in the recruitment, selection or assessment of employees or job applicants will be given appropriate information on our Equality, Diversity and Inclusion Policy and practices.

### Training Opportunities and Career Development

- The Company will communicate and make available opportunities for promotion and training to all employees on a fair and equal basis.
- No member of the workforce will be treated less favourably on the grounds of one or more of the protected characteristics or membership/non-membership of a trade union or because of a conviction "spent" under the Rehabilitation of Offenders Act 1974.

### Terms and Conditions of Employment

- The Company will ensure that employment terms and conditions and job requirements reflect its commitment to Equality, Diversity and Inclusion.
- Pay and benefits will be based on an individual's role, level of responsibility, skills, knowledge, experience, qualifications, and performance level alone and not according to any other distinguishing factor.

### Flexibility and Reasonable Adjustments

- Where appropriate and reasonable, the Company will provide flexibility in terms of working arrangements where cultural, religion, belief, or family needs conflict with work requirements.
- The Company recognises the rights of parents or those responsible for the care of a child or dependant adult through its Family Leave policies and procedures. For more information, please refer to HR.

## Disability inclusion

### Recruiting people with a disability:

- The recruitment team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.
- We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include for example: ensuring easy access to the premises for an interview / providing an alternative to a telephone interview for a deaf candidate/providing a suitable chair for an interview with a candidate suffering from back problems.
- If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from the HR team. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

### Reasonable adjustments for disabled people:

- If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.
- If you are experiencing difficulties at work because of your disability, please contact the HR team to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.
- For colleagues who are returning from long-term disability-related absence, we will explore putting in place a return-to-work support programme for you.

### Support available:

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, our Employee Assistance Programme (EAP) with the Lighthouse Charity can provide free, confidential advice. Details of how to access this service are on Insight.

Training on Equality, Diversity and Inclusion

All managers and supervisors involved with making decisions about a person's employment, will attend appropriate management and supervisory training courses which will include equality, diversity and inclusion training.

All new starters will receive an equality, diversity and inclusion briefing as part of their induction training/onboarding programme.

Every current employee will be encouraged to attend regular equality, diversity and inclusion briefings on an [annual] basis.

### Raising a Grievance:

All of our employees have the right to a working environment free from unlawful discrimination, harassment or victimisation. Any person who believes that they have received less favourable treatment on the grounds of one or more of the protected characteristics, membership/non-membership of a trade union or a "spent" conviction, should in the first instance try to resolve the problem informally by telling the individual concerned that they find their behaviour offensive and asking them to stop it. If they do not feel comfortable doing this and the offensive behaviour persists, the person affected should follow the Company's formal Grievance Procedure.

The Company will treat any such complaints with the utmost seriousness and discretion and a full investigation will be conducted. Staff who have raised a grievance relating to a case of discrimination, or who have provided information about such discrimination will not be victimised as a result.

### Disciplinary Action:

Any employee who discriminates against a colleague on the grounds of one or more of the protected characteristics, membership/non-membership of a trade union or a "spent" conviction, will be subject to the Company's disciplinary procedure.

Disciplinary action may be up to and including gross misconduct and could result in dismissal.

## Responsibility for the Implementation of this Policy:

- The Managing Director is responsible for the effective operation of the Company's Equal Opportunities Policy.
- The co-operation of all employees is essential for the success of this Policy. However, the ultimate responsibility for achieving the objectives of this Policy, and for ensuring compliance with relevant Legislation and Codes of Practice, lies with the Company. Senior employees are expected to follow this Policy and ensure that all employees, sub-contractors, and agents do the same.
- All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination.
- Employees may be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.
- The Company will regularly monitor and review the policy to ensure its continuing effectiveness in the workplace.

Signed on behalf of CML.



**C. MORTIMER BSc IEng MICE**  
Managing Director

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