

Equality, Diversity and Inclusion Policy

EXCELLERATE
SERVICES

WHERE **BETTER** BEGINS

Introduction to Excellerate Services UK

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful. 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.

1. Purpose & Scope

To provide a clear and confidential process for making expectations clear and reinforcing fairness, consistency, and legal compliance, including:

- Promote a fair, respectful, and inclusive culture
- Ensure equality of opportunity
- Comply with legal and ethical obligations
- Prevent discrimination, harassment, and victimisation
- Embed diversity and inclusion into everyday practice

The scope defines where and to whom the policy applies:

- **All employees at every level** - Applies to permanent, temporary, part-time, full-time and agency staff.
- **Job applicants and recruitment partners** - Covers advertising, selection, onboarding and all hiring processes.
- **Contractors, consultants and volunteers** - Ensures consistent expectations for anyone representing the organisation.
- **All work activities and environments** - Includes offices, client sites, remote working, training, events and digital spaces.
- **Policies, procedures and decision-making** - Applies to performance management, promotions, pay, training, grievances, disciplinary processes and organisational change.
- **Clients, service users and the wider community** - Ensures inclusive service delivery and respectful engagement with external stakeholders.

2. Policy Governance

- **Policy Owner:**
 - Head of Compliance & Risk (HCR)
 - Human Resources

- **Responsibilities:**
 - **Board / Executive Leadership accountability** - Holds ultimate responsibility for ensuring the organisation meets its legal and ethical obligations under the Equality Act 2010 and embeds EDI into strategy, culture and decision-making.
 - **Senior Leadership Team oversight** - Ensures EDI objectives are resourced, monitored, and integrated into business plans, risk registers, ESG reporting and organisational performance.
 - **EDI Lead / Compliance & Risk function** - Provides subject-matter expertise, maintains the policy, coordinates initiatives, monitors compliance, and reports progress to SLT and the Board.
 - **Managers and supervisors' responsibilities** - Apply the policy in day-to-day operations, ensure fair treatment, address concerns promptly, and model inclusive behaviours.
 - **Employee responsibilities** - Treat colleagues and stakeholders with dignity and respect, challenge inappropriate behaviour, and participate in training and engagement activities.
 - **External partners and contractors' expectations** - Required to uphold the organisation's EDI standards when delivering services or representing the organisation.

- **Oversight Body:**
 - Management Review Team
 - Head of Compliance & Risk
 - Director of People Services
 - Signed off by CEO

- **Review Schedule:**
 - Annual review
 - Review log (with version control and sign-off by oversight body)

3. Commitment to Frameworks

- **Alignment with:**
 - Modern Slavery Act 2015 compliance
 - Human rights and ethical labour standards
 - Equality, Diversity, and Inclusion principles
 - ISO management system standards
 - Responsible procurement and supply chain governance
 - Data protection and confidentiality obligations
 - Whistleblowing and safe reporting mechanisms
 - Organisational values and code of conduct

4. Responsibility Matrix (RACI)

Umbrella Policy	Overview Body	Responsible Person (s)	Informed
Ethical Policy	HR	Head of Compliance & Risk – Director of People Services - CEO	All staff Customers Supply Chain

5. Communication & Accessibility

- Published on:
 - External website
 - Internal intranet
 - Electronic Noticeboards
- Included in:
 - Annual compliance and refresher training
 - Management Review

Overview

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful.

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
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

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, volunteers, interns 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, harassment, bullying or victimisation. We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of their:

- disability.
- gender, gender identity or gender reassignment status.
- marital status.
- race, racial group, ethnic or national origin, or nationality.
- religion or belief.
- sexual orientation.
- age.
- civil partnership status.
- pregnancy or maternity.

- paternity.
- educational background.
- caring responsibilities.
- work status i.e., full time, part time or fixed term.

What we expect from you

We expect you, and every one of our people, to take personal responsibility for observing, 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.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. 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, harassment, victimisation or bullying.

If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- 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.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments".

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.
- using different standards for different groups of employees to judge performance.

Different types of discrimination 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 cancer.
- **Failing to make reasonable adjustments:** 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.

Examples of reasonable adjustments might include:

- allocating some of the disabled person's duties to a colleague.
- changing their working hours or place of work.
- adjusting procedures for assessing job candidates.
- modifying disciplinary and grievance procedures.

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 be aware that you can be personally liable for discrimination and 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.

Equality of opportunity

1. Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way and must have attended appropriate diversity and inclusion training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

2. Career development

Any decision you make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

3. Disability inclusion

a. 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 [ensuring easy access to the premises for an interview/adapting psychometric tests/replacing psychometric tests with an alternative option/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/list other relevant examples].

If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from [name of individual/the HR team]. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

b. Talking about disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (for those to whom it applies) under our Disciplinary procedure.

c. Reasonable adjustments

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 People Services 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 have a return-to-work support programme in place. For further information, please contact People Services Team

Training

If you are involved with making decisions about a person's employment, you must attend appropriate equality, diversity and inclusion training.

All new starters must attend equality, diversity and inclusion training as part of their onboarding programme.

Every current employee must attend regular equality, diversity and inclusion training on at least an [annual] basis.

We expect all our people to proactively support our equality, diversity and inclusion initiatives by attending events and workshops organised by the [employee resource groups/workstreams/support groups] to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

Monitoring and review

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.

“For us, Diversity & Inclusion matters to stay competitive and innovative. Diversity & Inclusion leads to better employee retention and productivity. Having a diverse workforce and maintaining inclusive working environment are key to the sustainability of the company Zero tolerance to any potential discrimination”.

Johan Venter - Group CEO, UK & Ireland

We are committed to providing equal opportunities for everyone and creating a work environment that is free from harassment and bullying, where everyone can achieve their potential. This policy applies to all employees, consultants, contractors, job applicants, agency and casual workers. We reserve the right to amend it at any time.

This Company aims to ensure:

- That no job applicant or employee receives less favourable treatment on the grounds of Race (including colour and ethnic/national origin), Religion or Belief, Sex, Sexual Orientation, Age, Gender re-assignment, Marriage or civil partnership status, Pregnancy and Maternity or Disability We ensure, where possible, full access to everyone applying for a vacancy.

- 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.
- Nobody applying for employment with the Company must 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 are capable of carrying out a key part of the job. It is acceptable to make some job offers dependent on a medical examination.

It is unlawful to ask job applicants anything that might suggest intent to discriminate on the grounds of a protected characteristic. Asking an applicant about their religion for a job entailing weekend working would not, for example, be permissible.

That no applicant or employee is placed at any disadvantage because of their Race, Sex, Religion or Belief, Sexual Orientation, Age, Gender re-assignment, Marriage or civil partnership status, Pregnancy and Maternity or Disability. We are fully committed to providing equal opportunities throughout employment. This includes during the recruitment, training and promotion of employees. Decisions concerning transfers and internal promotions are made so far as possible using only objective criteria.

If you feel or consider that you have been disadvantaged because of your Race, Religion, Sex, Sexual Orientation, Marital or Civil Partnership Status, Pregnancy or Maternity, Gender Re-Assignment, Age or Disability, do not hesitate to report the matter to your manager in order that the issue can be investigated and resolved.

If you want to take formal action, you will need to follow our Grievance Procedure and read our policy on harassment and bullying below. We will never victimise anyone who makes a legitimate complaint to us about harassment or discrimination.

The Company does not and will not tolerate any unlawful discrimination and/or harassment and anyone found to be acting in such a way will face disciplinary action that could include dismissal. Everyone has a duty to report any such behaviour to Management. We actively promote non-discriminatory behaviour and are fully committed to promoting equal opportunities in employment.

All Colleagues are essential for ensuring the success of this policy and each has their own duties and responsibilities. We all have a legal responsibility to comply, and any of us — management and staff — may be found personally liable for unlawful discrimination if we breach the terms of this policy.

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.

The ethos and standards covered by this policy can only be achieved and maintained if all colleagues also cooperate fully, and it is important to understand that you also have a legal responsibility to comply.

In order to prevent employees from being harassed, unlawfully discriminated against, bullied and/or victimised at work, we will:

- Bring our Equal Opportunities Policy to the attention of all new employees.
- Ensure that all employees have been informed that they must behave at all times with due respect and consideration to their fellow employees, managers and the other people they will meet during the course of their employment.
- Ensure that employees know that they are entitled to bring complaints of harassment, unlawful discrimination, bullying and/or victimisation to the attention of their manager or a director and that they have the right to have those complaints treated seriously and thoroughly investigated.
- Ensure that Managers are aware that harassment, unlawful discrimination, bullying and/or victimisation are regarded by the Company as gross misconduct and that they are dealt with accordingly through our Disciplinary Procedure.

Harassment and Bullying

Harassment and bullying on sex, race, age, disability, religion, sexual orientation, gender re-assignment or other personal characteristics, can interfere with an individual's work performance and create a hostile work environment. Harassment and bullying may also occur between employees outside working hours, for example, at work related social functions.

The Company recognises the problems that harassment and bullying can have upon health, confidence and morale. All employees of the Company have a responsibility to always understand and comply with this policy. It is also the responsibility of all employees to report any harassment or bullying that they are aware of within the workplace to their manager.

Identifying Harassment and Bullying

Conduct which is unwanted, unreasonable, violates people's dignity or is offensive and/or creates a hostile environment to the recipient. Everyone reacts differently and what may not be offensive to one person may be offensive to another. Harassment may even be unintentional on the part of the perpetrator. In particular, sexual attention becomes sexual harassment if it persists once it has been made clear that it is regarded by the recipient as offensive or unwelcome, although one incident alone may constitute sexual harassment if it is sufficiently serious.

Conduct, which is aggressive, humiliating, degrading or causes mental or physical injury to the recipient.

Where a person's refusal to submit to harassment or bullying, which then influences a decision, which affects that person's access to or continuation of employment, promotion, vocational training or any other decision affecting their employment.

Victimisation of or retaliation against an Employee who has complained in good faith of bullying or harassment or supported such a complaint.

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. For example, picking on someone or setting them up to fail or making threats or comments about someone's job security without good reason.

The following are examples of unacceptable conduct and will amount to a breach of this harassment policy. These examples are not exhaustive and there may be others:

- **PHYSICAL:** Unnecessary touching; patting; pinching or pushing against; assault or coercing sexual acts.
- **VERBAL:** Advances; persistent requests for social activities (after it has been made clear that such requests are unwelcome) or other persistent unwelcome attention of a personal nature; offensive and suggestive remarks; threats; intimate questions; innuendoes; lewd comments; obscene jokes; foul or obscene language; inciting racial hatred; racial or sexual abuse; jokes, teasing, nicknames or insults and inappropriate comments about dress, appearance or physique.
- **NON-VERBAL CONDUCT:** Displaying suggestive or offensive pictures, objects and written materials; leering; whistling and suggestive or offensive gestures and inappropriate use of e-mails.

Responsibility of Managers and Supervisors

Staff in supervisory or management positions must ensure that as far as they are able, they are responsible for and act immediately if they become aware of any harassment or bullying taking place and are supportive towards any employees who complain.

What to do if you feel you are subject to harassment

If you believe that you are the victim of harassment or bullying, you are strongly encouraged to make it clear to the perpetrator that you find such conduct unwelcome or offensive. In many cases this may be sufficient to stop the harassment. Where it is not sufficient and the harassment continues or where it is difficult or inappropriate for you to raise the issue with the perpetrator (for example, where the harasser may be in a more senior position or you do not feel comfortable doing so), you should contact your manager.

If you do not wish to make a formal complaint then the Manager may, if felt necessary, deal with the matter on an informal and confidential basis by speaking to the perpetrator on your behalf.

Where a formal complaint, will be dealt with in accordance with our Grievance Procedure. The Manager will arrange for the complaint to be promptly and fully investigated. As far as is reasonably practicable to conduct a fair investigation, confidentiality will be preserved.

Following completion of the investigation in appropriate cases, any necessary disciplinary action will be taken. The disciplinary sanction will depend on the particular facts of each case.

Serious incidents (even of a one-off nature) can constitute gross misconduct for which an employee may be summarily dismissed.

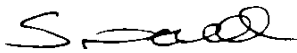
In appropriate cases, the Company may, with consent, transfer the perpetrator or the complainant to a different area or department, which may result in a change of responsibility and/or loss of status.

General

During any investigation the Company may suspend the alleged perpetrator and/or the complainant on full pay and benefits or temporarily re-deploy them. Suspension during investigation is not considered as disciplinary action.

Occasionally, people make complaints knowing them not to be true. They might do this to avoid or deflect disciplinary action, for example. 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.

Signed on behalf of Excellerate Services UK Ltd



Sarah Newland

Director of People Services



Johan Venter, Group CEO UK & Ireland

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