

GROUP POLICY

Diversity, Equity & Inclusion



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Diversity, Equity & Inclusion

General Statement of Policy

We believe that every colleague across the Group – regardless of their position, ethnicity, background, religion, sexual orientation or gender identity – should bring their full selves to work and be empowered to fulfil their full potential.

We know that diversity, equity and inclusion (DEI) offers long-term advantages for our business: more inclusive teams consistently perform better because they benefit from diversity of thought, ideas, and ways of working that people with different backgrounds, experiences and identities bring to a workplace.

Our ambition is to create an inclusive, diverse and equitable workplace. We will achieve that through developing our diverse talent, offering fair reward and recognition for work, and giving everyone the opportunity to have a meaningful say on matters that affect them. We will invest time to understand the needs of individuals from diverse backgrounds and take proactive steps to enable them to fulfil their potential.

We are an equal opportunities employer with zero tolerance of any form of discrimination due to ethnicity, background, religion, sexual orientation, gender identity, pregnancy, and maternity, citizenship, nationality, marital status or any other protected characteristic. We comply with all applicable DEI laws, regulations and standards and apply responsible standards where legislation is inadequate. We encourage all members of Diploma to call out discrimination, or discriminatory behaviour, either through their line manager or through our Whistleblowing hotline.

This policy applies to all our businesses and every aspect of how we work, and we believe our business leaders play a key role in creating an inclusive, diverse and equitable workplace. The Group will continue to support our Senior Leadership Team in the actions, initiatives and strategies they put in place and provide guidance and training where appropriate.



Johnny Thomson
Group CEO
July 2024

1 Culture

Diversity recognises that everyone is different. This includes differences in protected characteristics such as race, ethnicity, sexual orientation, gender, age, socio-economic status and disability as diversity in background, experience, or approach. Great teams are made up of people that bring a range of perspectives, values, ideas and challenge.

Equity recognises that individual needs require different approaches. Creating an equitable working environment requires us to remove barriers to opportunity that may affect some colleagues.

Inclusion requires a continuous and proactive effort to build a culture that everyone contributes and belongs to and encourages all colleagues to bring their whole, authentic selves to work. Inclusion requires us to review our processes and structures with a critical lens.

Culture

We are all accountable for upholding a positive culture of diversity, equity and inclusion (DEI), and our values of continuous improvement, accountability and respect are as relevant to how we manage DEI as they are to all aspects of our business.

A positive culture of DEI encourages open dialogue without fear or blame, emphasises continuous improvement and carefully considers how we encourage equal contribution and access for those at risk of being marginalised.

It is vital that every business encourages a positive culture of DEI, driven by the Managing Director and upheld by all colleagues. We hold all colleagues accountable for their own behaviour and the success of DEI across the Group.

An inclusive culture should be built in collaboration with, and in consultation with, colleagues and should engage colleagues in all DEI matters.

2 Minimum requirements

All Diploma PLC businesses are responsible for developing procedures and frameworks to suit their local needs. However, we expect all to comply with the minimum standards and requirements set out below:

DEI Policy

Develop a DEI policy, framework or plan that reflects your business' circumstances, as well as the DEI risks and opportunities in your business. This should be regularly reviewed, updated and communicated to colleagues, external agencies and any recruiters or other relevant service providers that you use.

Responsibilities

The Managing Director is accountable for DEI across their business. Clearly define roles and responsibilities for management, supervisors, employees and other relevant personnel regarding DEI matters.

Compliance with Laws and Regulations

Commitment to complying with relevant laws, regulations and industry standards related to DEI, as well as a framework for monitoring and ensuring compliance. Supplement with additional requirements as necessary in areas where local legislation is inadequate.

Communication

Ensure all colleagues understand their businesses DEI policies, specifically:

- clearly communicate your business DEI strategy, targets and standards,
- clearly communicate HR policies relating to discrimination, unfair treatment, zero tolerance and verbal, physical and sexual abuse either via an employee handbook or other accessible channel,
- build awareness of DEI in your business, whether through communication and active engagement, training, committees, listening groups or other format appropriate to your business, and
- communicate and practice zero tolerance for discrimination or discriminatory behaviour related to protected characteristic.

Training and Education

Equip and empower your management team through formal training. Specifically:

- provide training on diversity, bias and inclusion for those roles in your business that manage recruitment, such as HR and hiring managers, and
- persons responsible for DEI related data collection should be provided with the information and training required to request and collect data in line with local data protection laws.

Recruitment

Set expectations with recruiters that you expect to receive a diverse selection of candidate profiles shortlists. All recruitment materials should reflect the standards of this policy and be assessed for discriminatory or biased language.

Compensation

Ensure processes such as promotions and annual compensation reviews are equitable, identifying any barriers to progression and reducing any compensation gaps if they exist.

Incident Reporting and Investigation

Develop a clearly defined framework for reporting and escalating instances of discrimination, both anonymously and via a manager or grievance process. All employees must be able to confidentially report unfair treatment or discrimination through our whistleblowing hotline, which should be clearly displayed and communicate.

Maintain clear and well-kept records of any breaches or alleged breaches of this policy, investigations undertaken and resolution.

3 Governance

Businesses

The Managing Director is accountable for DEI within their business.

Group

The Group HR Director is responsible for the following:

- regular review of DEI key performance indicators,
- setting targets for gender diversity,
- oversight and support reporting and investigation of serious incidents,
- providing training resources,
- communicating relevant DEI information or issues to the Group, and
- investigation of DEI concerns raised directly, via the Whistleblowing procedure or a grievance.

4 Key Performance Indicators

All businesses will report the following key performance indicators biannually:

- Gender of Total Employees (% women)
- Gender of Senior Management Team (% women)
- Ethnicity of Senior Management Team (% of ethnic minority)

5 Contacts

5.1 Diploma PLC

If you have any questions on this policy, DEI concerns, or any suggestions on improving DEI, please contact Group HR:

Donna Catley, Group HR Director
Donna.Catley@diplomapl.com

Group HR Team
HR@diplomapl.com

5.2 Confidential Hotline

The Diploma Confidential Hotline is managed by Safecall, a respected, confidential and independent third-party organisation.

Safecall provides a 24-hours a day, 7 days a week service and can be contacted as follows:

- Freephone (full list Freephone numbers available on their [website](#))
- Raising an official report on their website (<https://www.safecall.co.uk/file-a-report/>)
- Email (diploma@safecall.co.uk)

When contacting Safecall via telephone, you will be put through to an operator who is trained to receive your report about concerns in the workplace that you feel cannot be addressed in any other way. Your call will not be recorded and will be treated confidentially and should you wish, Safecall will guarantee your anonymity.

When raising a report on their website you have the option to be named, semi anonymous or anonymous.