

DIVERSITY, EQUALITY AND INCLUSION (DEI) POLICY

Version:	Detail:	Approved by:	Date:
1.0	First issue following policy introduction and annual reviews	Paul Prisgrove	May 2019
1.1	Annual review	Elizabeth Mellor	Oct 2023
1.2	Annual review – updates added to align with additional policies and procedures implementing within the business	Elizabeth Mellor	Nov 2024
1.3	Annual review - updated to include sections 1.9 – 1.14	Elizabeth Mellor	Dec 2025

1.1 SMI Diversity, Equality and Inclusion (DEI) Policy

Here at SMI, we have pledged to promote equality, creating a diverse and inclusive workplace where all our workforce is truly respected, and our differences are celebrated. This policy applies to all our employees, subcontractors and associates. We are committed to carrying out non-discriminatory practices during the recruitment stage and across all our employment practices.

Ensuring all workers have safe and healthy working conditions; free from harassment, violence abuse or any conditions that could have harm their physical or mental health. Aligned with the UN Guiding Principles of Business and Human Rights (UNGPS), Ethical Trading Initiative Base Code and International Labour Organisation conventions (ILO) and 11 of the 17 Sustainable Development Goals (SDG's), SMI is committed to respecting internationally recognised human rights, which is demonstrated in our RPS and additional documentation including Supplier Code of Conduct, Code of Ethics, Child Labour and Young Worker Policy and Migrant agency worker Policy.

Our approach is based on the International Bill of Human Rights and relevant labour standards from the International Labour Organization (ILO). Transparency is at the core of what SMI stands for, promoting and delivering Equality, Diversity and Inclusion in the workplace.

1.2 Definitions

To ensure consistency and clarity, the following terms apply throughout this policy:

- **Diversity**
The presence of differences within the workforce, including protected characteristics, backgrounds, perspectives, experiences, and identities.
- **Equality**
Ensuring people are treated fairly and given the same opportunities, in line with legislation such as the Equality Act 2010.
- **Equity**
Recognising that individuals have different circumstances and may require tailored support or adjustments to achieve fair outcomes.
- **Inclusion**
Creating an environment where everyone feels welcomed, valued, respected, supported, and able to fully participate.

- **Belonging**
Ensuring people feel accepted, safe, and connected within the workplace community.
- **Fairness, Inclusion and Respect (FIR)**
Standards promoting a fair working environment where everyone is treated with dignity and respect across the entire value chain.
- **Harassment**
Unwanted behaviour that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Sexual Harassment**
Unwanted conduct of a sexual nature that affects dignity, safety, or wellbeing.
- **Victimisation**
Treating someone unfairly because they made, supported, or were involved in a complaint under this policy.
- **Reasonable Adjustments**
Practical changes or support measures provided to ensure accessibility and remove workplace barriers for individuals with disabilities or specific needs.

1.3 Scope

This policy applies to:

- All SMI employees
- Temporary, agency, and migrant workers
- Associates, subcontractors, consultants and suppliers
- Any individual representing SMI in a work-related capacity

It applies to behaviour on SMI premises, offsite activities, digital environments, and all work-related interactions.

1.24 Key Principles

SMI's DEI approach is based on three foundational principles:

1. Eliminate unlawful discrimination, harassment, victimisation and any other prohibited conduct. Covering all protected characteristics under the Equality Act (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation).
2. Advance equality of opportunity, promoting fair access and progression for across recruitment, development, promotion, pay and benefits, training, flexible working, parental policies, etc.

3. Foster inclusion, belonging and respect, ensuring all individuals feel valued, heard, and able to contribute, supported by a workplace culture that rejects bias, harassment, or victimisation.

1.5 Recruitment and selection

This policy details the measures taken to ensure an unbiased recruitment and selection process is implemented across the business, with every step aligned with the Diversity and Inclusion Policy and necessary regulations and laws.

The framework outlined in this policy has transparency and consistency at the core, promoting a fair, just, and free from discrimination recruitment process. All employees will be considered solely on their merits for career development and promotion with equal opportunities for all. We will develop employees in order that they understand the context of and the specific issues influencing equality and diversity. To prevent discrimination and victimization, we have implemented clear policies and procedures that promote equality, diversity, and inclusion in the workplace, establishing a culture of respect and fairness. In line with the Equality Act 2010, we will challenge discrimination based on but not limited to:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex, and sexual orientation

Actively promote equality and diversity; and ensure that the legislation and policy requirements within the nine protected characteristics of equality and diversity are implemented into all our working practices. Preventing all forms of unlawful discrimination against key areas including:

- Pay and benefits
- Terms and conditions of employment
- Dealing with grievances and discipline
- Dismissal
- Redundancy
- Leave for parents
- Requests for flexible working
- Selection for employment, promotion, training or other development

opportunities.

Our vision for equality and diversity goes beyond establishing processes to achieve change. As part of our interaction with our employees, members, member institutions and suppliers, we will endeavor to be proactive and monitor progress made towards meeting our objectives too:

- Encourage diversity and eliminate unfair treatment and discrimination through a full range of policies and procedures.
- Recognise that employees have the right to work in a supportive, safe, and harassment-free environment and have individual and collective responsibility to value and respect each other's contributions.

1.6 Our Commitments:

We are committed to encouraging diversity, equality and inclusion in the workplace, creating an environment in which all people have equal, dignified and ease of access to our goods, services, and facilities through the full range of SMI activities. We are actively working to increase and improve the usability and accessibility of our services and resources and in doing so aim to meet our legal, moral, and ethical obligations.

Our commitments include:

- Conducting annual risk assessments relating to DEI.
- Providing training for managers and the wider workforce on their DEI rights and responsibilities.
- Ensuring all employees comply with DEI standards and treat colleagues with dignity and respect.
- Making clear that employees and the organisation may be held accountable for bullying, harassment, victimisation, or unlawful discrimination involving employees, clients, suppliers, or members of the public.
- Handling all complaints under the appropriate grievance and disciplinary procedures, with potential escalation to gross misconduct where necessary.

Part of this commitment includes carrying out annual risk assessments training managers and the wider business campaign about their rights and responsibilities under the Diversity, Equality and Inclusion (DEI) Policy. All employees of SMI are required to comply with the company's DEI aims and to treat colleagues with dignity and respect. With an understanding that they, as

well as their employer, can be held accountable with all complaints for any acts of bullying, harassment, victimisation and unlawful discrimination, during their employment, against fellow employees, customers, suppliers or members of the public being taken seriously. Such acts will be handled as misconduct under our grievance policy and procedure and escalated gross misconduct outlined in our disciplinary procedure and policy. Both documents outline the appropriate steps and action that will be taken and how all parties will be communicated to during the process.

On the occasion that an act of harassment including sexual harassment amounts to both an employment rights matter and a criminal matter, such as a sexual assault allegation the appropriate business and legal response and action will be taken in accordance with our company policies and the law. Our employment practices, policies and procedures are reviewed annually or when necessary to ensure fairness and stay updated with changes to the law and regulations.

We are committed to SMI becoming fully accessible and inclusive. SMI are actively working to increase and improve the usability and accessibility of our services and resources and in doing so aim to meet our legal, moral, and ethical obligations.

We support and adhere to family-friendly and flexible working policies and regulations. Adopting an effective flexible working policy outlining a clear and transparent framework showcasing SMI's expectations whilst committing to improving our workforce's wellbeing and work life balance.

1.7 Everyone's responsibility

Every individual within SMI shares responsibility for fostering an inclusive workplace environment. All employees must:

- Treat colleagues with respect
- Recognise and value differences in perspectives and experiences
- Uphold the principles of this policy
- Familiarise themselves with our DEI expectations and apply them in daily practice

Senior Leadership Team (SLT) and Executive Leadership Team (ELT) members are expected to lead by example by:

- Championing DEI across the business

- Staying informed about DEI policies and updates
- Participating in required training
- Embedding inclusive behaviours and practices within their teams

1.8 Code of Conduct

Transparency is at the core of what SMI stands for, promoting and delivering Diversity, Equality and Inclusion in the workplace. We are committed to fighting corruption in all its forms, across our value chain ensuring all workers associated with SMI have safe and healthy working conditions, free from modern slavery, harassment, violence abuse or any conditions that could have harm to their physical or mental health.

Driving due diligence processes through our Responsible Partner Strategy (RPS) includes regular human rights and business ethics assessments both externally and self-run and audits conducted by a third party. Monitoring, reporting and addressing any risks that are identified through our prevention and corrective measures strategies. Communication is another key aspect of the RPS, focusing on open communication about progress, challenges and actions ensuring training is carried out to our people and our partners to ensure an understanding and adherence to our expectations and values to work with businesses committed to integrity consistently throughout their own value chain.

Where a regulation or law meets a higher standard than our RPS, that higher standard will take precedence over our RPS or company policies.

1.9 Supplier and Partner DEI Expectations

SMI expects suppliers, partners and subcontractors to uphold the same DEI, FIR, and human rights standards that we apply internally.

1.10 Requirements for Suppliers and Partners

- Compliance with the Equality Act 2010 and all relevant human rights legislation
- Adherence to SMI's Responsible Partner Strategy
- Maintaining safe, fair, and inclusive working conditions
- Ensuring no involvement in modern slavery, forced labour or discrimination
- Providing access to audits and assessments where required
- Addressing non-compliance through corrective actions

Where a supplier fails to meet the required standards, SMI may:

- Request immediate remediation
- Suspend the relationship
- Terminate contracts if necessary

1.11 Reporting Concerns and Support Pathways

SMI encourages all employees to raise concerns early and without fear of retaliation. Concerns may relate to discrimination, harassment, bullying, victimisation, or any breach of this policy.

How to Report:

Employees can report concerns through:

- Line Manager
- HR / People Team
- Senior Leadership Team (SLT)
- Whistleblowing channels
- Anonymous reporting mechanisms (if available)

Support During the Process:

Employees will be provided with:

- A safe, confidential environment to share concerns
- Clear information on next steps and timelines
- Access to support services (e.g., Employee Assistance Programme if applicable)
- Protection against retaliation or disadvantage

How Concerns Are Handled:

- All concerns will be taken seriously and investigated promptly
- Matters will be handled with fairness, sensitivity, and confidentiality
- Where required, concerns will be escalated under the grievance or disciplinary policies
- Outcomes and actions will be communicated to relevant parties in line with policy

1.12 Monitoring, Data and Accountability

To ensure fairness and continuous improvement, SMI monitors DEI-related data in line with GDPR requirements.

We Commit To:

- Monitoring workforce diversity data appropriately and ethically
- Conducting annual DEI and FIR performance reviews
- Reviewing recruitment, development, pay, and progression trends
- Tracking completion of mandatory training
- Identifying potential inequalities or barriers
- Setting and reviewing annual DEI objectives
- Reporting progress to the SLT and ELT
- Taking corrective action where needed

Data will be treated confidentially, securely, and transparently.

1.13 Training and Development

SMI ensures all employees understand their DEI responsibilities through regular training and ongoing development.

Mandatory Training Includes:

- DEI induction training for all new starters
- Anti-harassment and anti-bullying training
- Inclusive communication and behaviour training
- Unconscious bias and inclusive leadership training for managers
- FIR training for roles in leadership, recruitment, or supply chain
- Annual refresher training

Training content is regularly reviewed to ensure alignment with legislation, best practice, and emerging social value expectations.

1.14 Consequences of Breaching this Policy

Breaches of this policy, including acts of discrimination, harassment, bullying, or victimisation, will be treated seriously and may result in:

- Informal action
- Formal warnings

- Mandatory training
- Adjustments to working arrangements
- Dismissal for gross misconduct

Where behaviour may constitute a criminal offence, SMI will involve the appropriate authorities in line with the law.

1.15 Legislation and Supporting Documents

This policy is underpinned by the following legislation, regulatory frameworks, and internal documents, which collectively support SMI's commitment to Diversity, Equality, Inclusion and Belonging (DEI&B), Fairness, Inclusion and Respect (FIR), and wider social value obligations:

- The Equality Act 2010
- SMI Code of Conduct
- Grievance Policy and Procedure
- Whistleblowing Policy
- Disciplinary and Dismissal Policy
- Flexible Working Policy
- Equal Opportunities Policy
- Code of Business Conduct and Ethics
- Dignity at Work Policy (including bullying, harassment, and sexual harassment)
- Responsible Partner Strategy

These documents collectively outline the standards, expectations, and behaviours required of all employees, and support compliance with current legal, ethical, and social value responsibilities.