

Diversity, Equity and Inclusion Policy

It is the responsibility of all APEM Group employees to comply with this policy and to report concerns. APEM Group prohibits any form of retaliation for the reporting of such matters.

All staff will be made aware of this policy as part of their induction on appointment and subsequent on-going training. This policy is communicated and published on the company website for all interested parties.

Reference	Version	Date released	Approved by
T1-GP-043	1	1/7/2024	Meriel de Lacey
This policy is communicated and published on the company website for all interested parties.			
This policy is subject to periodic review and change to ensure it remains valid. The policy may be reviewed when prompted by context, such as developments in legislation, industry practice, or the organisation.			
The live version of this policy can be found on The Source and is the only version that is controlled. Any other versions either printed or embedded into other documents or web pages should be viewed as uncontrolled and as such may not necessarily contain the latest updates, amendments or linkages to other documents.			
This Policy has been Equality Impact Assessed and no adverse impact has been identified.			

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1. Policy

1.1. Policy Statement

<p>Purpose:</p>	<p>This policy sets out APEM Group’s position and practices aimed at protecting and enhancing Equity, Diversity, and Inclusion throughout our growing Group. It is intended to inform the standards, practices, and behaviours to be adopted and expected by all members of our organisation to achieve our shared aims in this regard.</p> <p>The policy sets out non-negotiable standards and describes the mindset with which leaders and all members of APEM Group are expected to approach this challenge and the evolving social discourse surrounding it.</p>
<p>Scope:</p>	<p>This policy applies to employees of all businesses within APEM Group, and the behaviours described are also expected from sub-contractors and other parties who represent APEM Group or otherwise participate in our business operations.</p> <p>The principles set out in this policy apply;</p>

	<ul style="list-style-type: none">• in the physical or virtual 'workplace' and during work-related activities and interactions; and• outside the physical or virtual 'workplace' but in an employment-related context, such as at customer, supplier or industry events, work-related social events, and within informal community groups. <p>When businesses join the APEM Group there will be an integration period during which the adoption of policies will be phased, if your employing entity has been with the Group for less than 2 years and you are unsure of which policy applies, please check with your manager or the People team.</p> <p>This policy is grounded primarily in employment law established in the UK and Ireland, however APEM Group will adhere to employment law in any territory in which it is established as an employer. What's more, we seek to enhance basic legal standards and share good practice across the territories in which we operate.</p> <p>This policy does not form part of a contract of employment and will be amended or supplemented from time to time. To this end, feedback and suggestions are welcomed. Any modifications will be announced via our internal comms processes.</p> <p>As our policies, resources and guidance continue to develop with input from Belonging Groups and the People Team, please do ask about topics that relate to protected characteristics or circumstances you don't see reflected today. Ahead of defined policies or guidance the People Team are open to discuss and keen to support employees through events such as religious holidays, menopause, IVF or surrogacy, and gender reassignment, to name a few.</p>
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In our drive for inclusivity, we specifically recognise various 'protected characteristics':

- Age
- Disability and neurodiversity
- Sex, Gender, and Gender reassignment
- Pregnancy and maternity
- Family status/ caring responsibility (defined as having responsibility as a parent or person in loco parentis for a person under the age of 18 years, or responsibility as a parent or resident primary carer of a person of 18 years or over with a disability requiring care or support).
- Sexual orientation
- Marriage or civil partnership status
- Race (including colour, nationality and ethnic or national origin and membership of communities with local protections such as traveller or first nation)
- Religion or belief

As well as other circumstances:

- Those who work on a part-time, fixed-term, temporary, intern or volunteer basis as well as agency workers and apprentices.

- Socio-economic backgrounds.
- APEM Group will not, directly, or indirectly, discriminate or victimise in relation to any protected characteristic; held by, previously held by, perceived to be held by, or associated with any employee, worker or job applicant, or based on the above listed circumstances.

At APEM Group we embrace our duty of creating equal opportunities throughout employment, including three major focal areas:

1. Behavioural standards and protection from harassment
2. Assessment for employment, career and learning opportunities, as well as recognition and reward.
3. Reasonable adjustments for those with disability, neurodiversity, and carer status.

To this end the Leadership and People teams will establish practices, education and engagement designed to tackle bias and other barriers and protect from unlawful and unfair discrimination (see definitions below).

Delivering on this commitment requires all members of the APEM to engage in our shared aims and associated discourse, and apply the principals of this policy, daily.

1.2. Legislation/Standards/Other Related Policies

Equality, Diversity, and Inclusion are wide-ranging subjects, and this policy should be considered alongside other APEM Group policies, including but not limited to those dealing with harassment and bullying, recruitment and promotions, family leave (maternity, paternity, adoption, shared parental, parental), medical leave, ill-health capability, emergency time off for dependants, dress code and flexible working.

1.3. Terms and Definitions

1.3.1. Definition of Unlawful and Unfair Discrimination

For the purposes of this policy 'discrimination' includes direct and indirect discrimination and other 'prohibited conduct' and is interpreted in accordance with the UK Equality Act 2010 as set out below. In territories where legal definitions are broader than those described below, local legislation will preside.

- **Direct discrimination**—this is treating someone less favourably (or, in the case of pregnancy and maternity, unfavourably) because of a protected characteristic. An example of this would be paying you less because of your sex or because you belong to a particular racial group. 'Because of' is very wide and will cover behaviour that takes place, for example because of sexual orientation. It also includes less favourable treatment because you are associated with another person who has a protected characteristic, e.g., because you are a primary carer for a disabled child. Such treatment is unlawful unless, in relation to age only, it can be objectively justified, i.e., APEM Group can show that it is a proportionate means of achieving a legitimate aim.
- **Indirect discrimination**—this is treating a group of people in the same way, but in a way that adversely affects those with a protected characteristic. An example of this would be telling all employees that they must work late at night—although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women or single parents. Such treatment is unlawful unless it can be objectively justified.
- **Victimisation**—this is treating you less favourably because you have alleged discrimination or asserted your right not to be discriminated against because of a protected characteristic. An example of this would be a disabled employee claiming that they had been discriminated against, who is then refused a reference by their manager because of that claim.

- **Harassment**—this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating, or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature. It may also occur where someone harasses the victim, the victim either rejects or submits to the harassment and, because of that rejection or submission, that person then treats the victim less favourably.
- **A disability** is defined as a physical or mental impairment that has a substantial and long-term effect upon a person's ability to conduct normal day-to-day activities. Some disabilities are immediately obvious while other disabilities may not be apparent at all, for example carrying an HIV infection. Cancer, HIV infection and multiple sclerosis are disabilities from the point of diagnosis. While people with diagnosed neurodiversity do not always classify themselves as 'disabled', their status attracts the rights of a disability. Certain conditions are not classified as disabilities, for example poor eyesight that can be corrected by wearing prescription eyewear, or addiction to alcohol or other substances.
- In the case of disability only, **discrimination arising from disability**—this is unfavourable treatment of the disabled person because of something arising in consequence of a disability. Such treatment is unlawful unless it can be objectively justified.
- In the case of disability only, the duty to make **Reasonable Adjustments**—this duty comprises three requirements, each of which arises where a disabled person at a substantial disadvantage in relation to a 'relevant matter':
 - the first is a requirement, where a provision, criterion or practice puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
 - the second is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage; and
 - the third is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

1.4. Diversity Data

In accordance with local legislation and data regulations, we will collect and analyse aspects of diversity data from candidates and employees on a purely voluntary basis, always with a 'prefer not to say' option available.

The purpose of this data collection is to identify disparities between demographic groups and to assess progress in reducing any identified disparities. Individual data will only ever be stored in specialist HR systems and available to relevant roles within the People Team and such data will only ever be shared outside this team in aggregated form, in groupings greater than 5.

The classifications used will be in line with regulations and designed to meet the needs of diversity monitoring. For example, to better understand the position of an underrepresented population, demographic groups may need to be aggregated to make trends visible.

Data security, retention, and processing will always be in line with GDPR and other local data handling and privacy regulations. For more detail, please refer to our Data Privacy statements:

Applicant Data Privacy Statement: <https://jobs.apemltd.co.uk/privacy-notice.pdf>

Employee Data Privacy Statement: [In the Policy Library on the Source](#)

1.5. Inclusive Behavioural Standards

One of the most frequent compliments made about APEM Group by employees is the welcoming culture. We want to ensure this is not just common but universal.

The Vision of APEM Group is to bring together the *Brightest Minds* around the big challenges threatening our *Shared Natural Environment*. As a Group of increasingly diverse capabilities, we seek to unite around this vision and not an exclusive social identity. To achieve this, we must tackle barriers to collaboration and build an environment of belonging and enablement which unlocks our full individual and collective potential.

No one should be made to feel uncomfortable by interactions when they come to work. As a minimum, there is an expectation that all members of the APEM Group treat each other in their interactions with professional respect and an assumption that we all contribute with the best of intentions. Common communication traps when making jokes, sharing media content or expressing frustration (e.g. inappropriate use of capitals, exclamation marks, copied parties) are easier to fall into when we don't approach relationships consciously aiming for inclusion.

Anyone who feels they are not treated with respect at APEM Group in any way, big or small, can raise this with the individual displaying the behaviour, their manager or the People Team and expect to be listened to and supported in resolving the situation (see Breaches of this Policy section towards the end of this Policy). Raising small issues early is a great way to support collective learning.

Mental health can both drive behaviour and be impacted by the behaviour of others and can be an area of vulnerability for some demographics. APEM Group has a range of established resources and programmes to offer confidential support for the mental wellbeing of all team members, these are signposted on our Intranet.

- Subjects of Unconscious Bias, Inclusion and Allyship* form part of our onboarding programme and training is available to all employees via our learning platform to ensure that this awareness is a cultural norm across the APEM Group.

**The discourse on inclusion and belonging continues to evolve, these are some of the areas we are currently focused on overcoming in the pursuit of our vision:*

Our brains have evolved to classify and assume and our unconscious biases bleed into our words and actions in a way we rarely see, let alone intend. Systems and processes can help prompt conscious recognition and reflection.

'Othering' is the thinking (which invariably bleeds into behaviour) which accentuates and stigmatises points of difference in others to create a reassuring sense of 'normalcy' for ourselves. This can play out actively in micro-aggressions or outright harassment, but also more passively through the absence of the support through which we lift those we do connect with.

In reality, identity is immeasurably multi-faceted. By consciously choosing to educate ourselves on different experiences and to seek out what we share, we can create connections which enhance each of us.

Most of us hold privilege of one form or another in a society designed around a homogeneous demographic. The nature of privilege is that while it holds significant influence it is often invisible to us unless we really look for it. By showing allyship to those who don't hold our privilege we can chip away at the boundaries that limit us.

If there are topics, you are unfamiliar with or you are facing a new challenge you can engage in the wealth of positive educational content and discourse out there available to us all.

In addition, Belonging groups will support the development of communication campaigns intended to increase understanding and empathy on topics relating to DE&I.

While People Managers across the group have a formal accountability to demonstrate inclusive behaviours as they seek to develop and support the team members they lead, you don't need to be a leader to be influential. All members of APEM Group have a role to play in role in modelling inclusivity and allyship and supporting and engaging with colleagues.

1.6. Assessment and Selection

APEM is proud of the diversity within our workforce, and we endeavour to attract, welcome, develop and retain people with different perspectives, experience, and backgrounds to support us in our vision.

Our brains have evolved to classify and assume; our unconscious biases bleed into our words and actions in a way that is unintended and can be hard for us to even notice. Where people are taking actions that influence careers and reward these biases can create unfair and even unlawful barriers if not fully engineered out. Education, systems, and processes are in place across APEM Group to address areas of risk and prompt conscious recognition and reflection and protect from bias. These are subject to regular review and open to employee input and feedback.

- **Recruitment:** Our focus on ED&I in defining roles and attracting potential candidates is essential to enable access to a the widest and most diverse talent pool available. By the end of 2024 all hiring managers will have undertaken our full training programme which address unconscious bias traps and how to approach the recruitment process in a way that fosters fairness, transparency, and equal opportunities for all individuals, regardless of their background or characteristics. Where we engage third parties to recruit on our behalf, ingrain these principles in the recruitment process is a condition of their engagement. The Talent Acquisition (TA) team are trained to identify and challenge bias, and to consider diversity and hidden bias in the design process for all job descriptions, job advertisements and selection criteria, screening methods and decision-making.
- **Performance assessment:** Employees' performance assessment, wherever possible, will be based on standardised job descriptions and behavioural descriptors, and delivery of objectives and measurable results (KRAs) which will be discussed and agreed in advance. The grading of in-year performance is standardised through structured questions and is calibrated across teams by the People Partners.

No member of a particular group of workers will face sanctions for performance or behaviour that would be accepted in another group, unless there is genuine and lawful justification for different treatment. See also the section within this policy on Reasonable Adjustments.

- **Promotions:** All role opportunities below Director level are advertised internally on our recruitment platform. Employees can subscribe to alerts to be notified of all opportunities that match their career aspirations and discuss opportunities in confidence with the TA team. Every competitive decision will follow a structured selection process to ensure appointments are based on an objective assessment of capability. Existing flexible and reduced working schedules will be accommodated wherever possible through role adaptations, including in senior roles.
- **Director Appointments:** Due to the strategic influence of roles at director level and above, building diversity in our leadership team is an important component of our ED&I strategy. There are significant advantages to promoting existing employees and therefore this will often be a preferential route. The creation of opportunities at or above the level of Director tends to be something that evolves over a period and therefore follows a period of career discussion and development with individuals who hold relevant skills, and calibration amongst the Exec team. To ensure we can create as many opportunities as possible for candidates ready for

promotion to this level, annual career conversations are held with individuals. External appointments can also have an advantage through the introduction of diverse thought and experience. As such when this route is taken to appointment all third parties are engaged based on a commitment to seeking out a diverse candidate shortlist.

- **Reward:** Decisions around reward are based on data points gathered annually identifying the market value for the role, capabilities, and performance: never on social identity (as defined earlier). It is experience, potential, skills that count.
 - APEM Group is committed to the Real Living Wage in UK and Ireland and any equivalent standards in other territories in which we operate. This means that we do not offer unpaid 'work experience' which would exclude those without financial security from benefiting from the advantage this brings.
 - APEM Ltd published its first Gender Pay Gap report in 2023, going beyond the statutory requirements in exploring contributing factors.
 - APEM Group strives to pay fair and equal salaries for equal roles. This aim is being furthered through the ongoing development of job families and grading reviews across our expanding Group.
 - People leaders are provided with training to encourage open dialogue around salary awards and criteria for progression, and anonymous feedback is collected through the twice-yearly engagement survey which includes a benchmarked rating on reward fairness. Any equal pay claim will be dealt with quickly and openly.
 - Bonus schemes are set for each financial year and are governed by objective measures such as business unit performance vs. target, proportion of time in the business within the reference period, and calibrated performance assessment (see point above). Both design and awards are reviewed for balance and bias.
 - A formal review follows the annual pay and bonus event, including the analysis of trends as well as the collection of feedback, and potential bias in the system is one of the assessment points.
- **Redundancy:** In the case of any redundancy process, criteria and procedures will be carefully examined to ensure that they are not, in design or application, unlawfully discriminatory. They are always subject to consultation, through which they may be adapted. The provision of any redundancy benefits (voluntary or involuntary) will be equally available to holders of all relevant roles unless there is a genuine and lawful justification for doing otherwise.
- **People Management:** In addition to the above, for the element of people leadership not governed by process all people managers are provided with a growing training programme to support their capability as inclusive leaders.

1.7. Reasonable adjustments for those with a Disability, Neurodiversity or Family/ Carer status

Please see Definitions section for a description of how a disability is defined for the purposes of this policy. If you would like further information about whether a particular condition is a disability for the purposes of this policy, please contact the People team.

People Managers are only able to effectively support individuals in their team who may experience or are experiencing challenges as a result of their disability or carer status if they are aware of that status. For this reason, and to inform our duty of care in relation to a wider range of health conditions, we ask employees to disclose all relevant circumstances on joining the organisation. A disclosure can only be acted on if made formally.

It is not always possible to completely eradicate the restrictions a person's disability or carer status places on them in relation to the requirements and deliverables of a specific activity or role, however APEM Group has an organisational commitment to understanding needs, exploring all adjustments

and, where reasonable, implementing them to ensure all employees are able to participate in the Group's working practices and activities on an equitable basis.

The People Team are equipped to support to People Managers through the process of understanding needs and options and implementing reasonable adjustments.

Where adjustments relate to the performance of a long-term role, this assessment will often include the People Team seeking guidance from an Occupational Health provider or other qualified specialist.

Where adjustments relate to a one-off activity such as an application process or other assessment, or attending an event or site, the level of investment that is reasonable may be reduced. The same depth of assessment may not be appropriate and may be limited to generic research and/ or the individual's prior experience.

1.8. Breaches of this policy

If you have any doubt or concern about this policy, or how it should be applied in any instance or situation, please contact the People team.

We are keen to hear your feedback. Learning and eradicating either individual behaviour or systemic practice that runs contrary to this policy requires that instances of weakness or breach are reported and explored. This might be something you have experienced or simply noticed.

If you feel that you have personally suffered from a breach of this policy, you can raise this through the Grievance Procedure.

All Grievances, either internally or externally, will be treated confidentially, seriously and will be dealt with promptly. The People team will provide guidance and necessary support.

There may be instances where you do not feel a formal grievance is the best first step. You can raise a concern in confidence with any people manager more senior than yourself or member of the People Team, who will be able to advise on the best course of action.

If you wish your grievance or concern to be treated as confidential, you should make sure that the individual you raise it with is fully aware of that aspect of your request. A high level of confidentiality can limit the extent to which issues can be tackled robustly, with this in mind your agreement will always be sought before any steps are taken.

Unwarranted allegations that are not made in good faith may be considered as a disciplinary matter, however you will not be victimised in any way for making any complaint in good faith or for assisting another doing so, even if your complaint is not upheld.

APEM Group will not accept behaviour that goes against this policy, and where you are alleged to have breached this policy, you will be subject to an exploratory investigation which could result in application of the Disciplinary Procedure.

Serious breaches of this policy such as acts of unlawful discrimination and serious or repeated incidents of harassment and bullying will be treated as gross misconduct, irrespective of whether the causes are viewed as malicious or simply negligent.

We approach every concern as an opportunity for organisational improvement.

2. Roles and Responsibilities

The responsibility for the practical application of this policy falls upon every member of the APEM Group.

- Engage in DE&I communications and training, educating ourselves on topics which will enable us to improve our own inclusivity.

- Participate with an open mind in feedback (giving and receiving).
- Take accountability for the consequences of our words and actions, intended or otherwise.
- Role model inclusive behaviour and act as an ally to those experiencing anything which falls short of the shared aims set out in this policy.

Individuals in roles with additional influence hold additional accountabilities:

2.1. Apem Group Board Members

- Define the ED&I strategic plans, allocate resources, set targets, and support and ensure progress.
- Ensure lessons are learned and changes made because of policy breaches.
- Ensure the company meets its legal obligations including, but not limited to, Prevention of Discrimination and Harassment, Data Privacy and Security, Equal Pay investigations and Gender Pay Gap Reporting.

2.2. People Managers

- Role model inclusive leadership, equipped by training attendance, which results in consistently high levels of engagement.
- Following process and guidance, and seeking support where appropriate, to protect people management activities such as assessment, development, and reward from unconscious bias.
- Supporting team members to understand their needs to create equitable opportunities, including implementing reasonable adjustments.

2.3. People Team

- Develop, review, promote and implement this and related policies as well as guidance and resources to support policy aims.
- Ensure the availability and drive adoption of training related to DE&I topics, including within the induction / onboarding process.
- Protection and handling of diversity data in line with Privacy Policies and Statements. Analysing and providing/ presenting key information to inform assessment and action planning. Periodically reviewing approach.

2.4. Belonging Groups

- Seeking data and insight internally and externally (including benchmarks) to inform assessment and planning.
- Develop action plans for meaningful change and work with the Board to create alignment around the scope of activity, and commitment to any resource allocations.
- Ensure the progress of belonging initiatives under the Belonging Group action plans, as well as those owned elsewhere, such as by the People Team.
- Raising collective engagement in and understanding of key topics to feed an inclusive culture.
- Offer a community of support.
- Influence the development of APEM Group's policies and practices.

3. Implementation/ Monitoring/ Audit/ Review

The procedures outlined in this policy are subject to continuous review and may be updated at any time to ensure their relevance and effectiveness.