



Equality and diversity policy

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We strive to be an employer that embraces equal opportunity and diversity and inclusion for all members of society.

We seek to eliminate unlawful discrimination and promote equal opportunities by satisfying the objectives and intentions of all relevant legislation and codes of practice pertaining to equal opportunities in employment.

The policy commitment of the Company is to:

- Review selection criteria and arrangements frequently.
- Ensure individuals are selected, promoted and treated on the basis of their relevant merits, skills and abilities.
- Ensure employees are given equality of opportunity and encouraged to progress within the Company by recognising and valuing employees' different backgrounds, knowledge and experience to develop an effective workforce which meets our customers' needs.
- Ensure procedures are inclusive and positive in our support of all elements of our society.
- Embrace individual differences to develop a diverse workforce.
- Monitor the effective implementation of our aim on a regular basis.

This intent is supported by our documented Business Management System.

The policy and associated documentation is made known to all employees and will be reviewed on a regular basis.



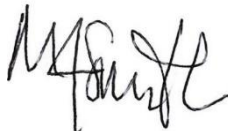
Paul Gandy
Chief Executive Officer



Craig Tatton
Chief Operating Officer



Nick Pollard
Chair



Martyn Smith
Commercial Director



Matthew Gill
Chief Financial Officer

1. Policy statement

Tilbury Douglas and its direct and indirect subsidiaries (the “Company”) are committed, in accordance with its values and culture and as part of its wider approach to respect for and the protection of Human Rights, to diversity.

Diversity in all its forms is fundamental to the Company’s business. We operate in a variety of environments and geographies, in numerous roles, for a wide range of clients. To do this effectively we need an equally diverse workforce that understands our customers’ needs and stimulates innovative solutions. The Company values the benefits it gains from a workforce with a rich diversity of skills, cultural backgrounds and gender. Our goal is to recruit, motivate, develop and retain outstanding people that reflect that diversity.

We are also committed to ensuring that every employee has equal opportunity to develop and progress at every level in the organisation based on personal contribution and ability, with the aim over time of realising the benefits of diversity in the development of our management and executive leadership.

As part of our Better Together initiative, which aims to make our company a more inclusive and diverse place for us all to work, we have successfully achieved the National Centre for Diversity’s (NCfD) Investors in Diversity Standard at conditional review.

Therefore, we are committed to embedding the NCfD’s FREDIE values across all we do and with everyone we interact with internally and externally. This will help to enable us to keep striving forwards to reach our objective of creating a truly inclusive and friendly business and increase the sense of belonging and pride in our company and in what we do.

The FREDIE values are:

- Fairness for all is a reality
- Respect for all is the norm
- Equality of opportunity for all is embedded
- Diverse employees feel that they belong
- Inclusion is widely understood, where all colleagues are committed to inclusive behaviours
- Engaged - where there is a positive emotional attachment between colleagues, their work, managers and leaders

Please ensure to embed these values within your role and your interactions with others.

2. Supporting policies and procedures

This policy is underpinned by and should be read in conjunction with a range of other company policies, including:

- The Company policy on “Human Rights and Anti-Slavery”;
- The Company policy on “Harassment, Bullying and Victimisation”;
- The Company policy on “Sustainability”; and
- The Company policy on “Whistleblowing”.

All of these policies support our aim to ensure diversity, in order to facilitate a wide range of insights and behaviours that will make a valuable contribution to the performance of the Company.

3. Scope of application

This policy and the associated policies have been developed centrally and are subject to periodic review by representatives of all Divisions within Tilbury Douglas, with support from relevant business functional teams and external specialists and utilising appropriate industry publications and guidance.

This policy applies to and is intended to be binding on all persons working for the Company or on our behalf in any capacity, including directors, officers, employees, workers, agency personnel, seconded personnel, volunteers, interns, agents, contractors, consultants, intermediaries, third party representatives, business partners, sponsors or any other person associated with us, wherever located.

This policy will also be championed and promoted in all businesses where the Company does not have management control.

4. Principles

4.1 The company board

The Board believes that diversity can bring insights and behaviours that make a valuable contribution to its performance. In considering new members, we will aim to select individuals best able to contribute to an effective, challenging and cohesive Board by blending a diversity of skills, experience, knowledge, independence, cultural background and gender. Given constraints on the size of the Board, this will be achieved by taking into account the overall contribution to diversity alongside other desired characteristics in new appointments rather than by setting specific targets on any single dimension of diversity. We would expect this to lead to greater diversity on the Board and divisional boards over time. We will monitor our success in developing the diversity of the Board as part of our annual evaluation of Board effectiveness.

4.2 The staff of the company

We will continue to monitor the extent to which our staff believe that the Company is committed to and is taking action where necessary or helpful in order to promote diversity and equal opportunity.

5. Responsibilities

- (a) The Board of Directors of Tilbury Douglas has overall responsibility for:
1. the development and publication of this policy, in line with our legal and ethical obligations; and
 2. ensuring that specialist advice and guidance on the content of this policy is made available to the staff of Tilbury Douglas on demand.
- (b) Management personnel, at all levels within each Division and each Business Unit of Tilbury Douglas, are responsible for:
1. distributing and promoting awareness of this policy to all relevant persons under their control;
 2. identifying the need for and, when identified, promptly procuring appropriate training on the subject of this policy for all relevant persons under their control;
 3. ensuring that all relevant persons under their control understand their obligations under the law, this policy and any other relevant policies and standards adopted by Tilbury Douglas;
 4. ensuring that all relevant persons under their control comply with the law, this policy and any other relevant policies and standards adopted by Tilbury Douglas;
 5. ensuring that they are informed of any material risks to compliance with and any breaches of the law, this policy and any other relevant policies and standards of Tilbury Douglas; and
 6. taking appropriate action to address any issues raised.
- (c) Company staff must:
1. read and understand this policy;
 2. attend and participate actively in any and all training made available to them on the subject of this policy and other relevant policies and standards of Tilbury Douglas;
 3. follow the requirements of this and all other relevant Tilbury Douglas policies and standards adopted by Tilbury Douglas in performing their duties; and
 4. be alert for and report any activity, transaction or course of dealing which they suspect may infringe applicable law and/or any relevant policies and standards adopted by Tilbury Douglas, which they encounter during the performance of their duties.

6. How to raise a concern

Any person who has any concern about any act or omission which might constitute an infringement of applicable law and/or this or any other policy of the Company is encouraged to raise the issue at the earliest opportunity, either with an appropriate member of the management team of the Company or through our Whistleblowing Helpline in accordance with the Company Policy on "Whistleblowing".

7. Protection for persons raising concerns

The Company aims to encourage openness and will support any person who raises concerns, even if they turn out subsequently to be mistaken, by protecting them from any detrimental treatment (such as dismissal, disciplinary action, threats or unfavourable treatment) as a consequence of their actions. Any such detrimental treatment should be reported using the Company's Managing Grievance Policy.

8. Our response to breaches of the law and/or this policy

In the event that any breach of the law and/or this policy is discovered, we will take appropriate action, which may include (but may not be limited to):

- a) reporting such breaches to the relevant law enforcement bodies and/or regulatory authorities;
- b) instituting disciplinary action against the relevant employees, which could result in dismissal for misconduct or gross misconduct; and
- c) terminating our business relationship with other individuals and organisations.

9. Review

We will periodically review this policy and its implementation to confirm and improve its suitability and effectiveness. Any changes to this policy shall not constitute a change to the terms and conditions of employment of any person.