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# Diversity, Equality and Inclusion Policy

Department:	ESG
Policy Owner:	ESG Manager
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## 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 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. 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:

- 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.

### **1.3 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.

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.

#### **1.4 Everyone's responsibility**

We all have a responsibility to treat one another with respect, acknowledge that everyone is entitled to different views and opinions and uphold to the values outlined in this policy. Employees share the responsibility to familiarize themselves with this policy and promote Diversity, Equality and Inclusion, ensuring this policy is implemented across all practices.

The Senior Leadership Team (SLT) are expected to lead by example and champion Diversity, Equality and Inclusion across the business. Ensuring they stay updated to this policy, attending all necessary training sessions and actively promoting this policy and the practices linked with DEI across the business and within their teams.

#### **1.5 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.

#### **1.6 Legislation and additional documents**

- The Equality Act 2010

- SMI’s Code of Conduct
- Grievance Procedure and Policy
- Whistleblowing Policy
- Disciplinary and Dismissal Policy
- Flexible Working Policy
- Equal Opportunities Policy
- Code of Business Conduct and Ethics
- Dignity at work policy (Harassment and bullying)
- Responsible Partner Strategy

**1.7 Communication:**

This policy along with the additional documents listed in section 1.6 are all available on SMI’s Policy Directory and via SMI’s intranet. Certain policies including our Diversity, Equality and Inclusion are accessible to our stakeholders via our website. New employees will be briefed on the content of this policy during the induction process.

All staff will be undergoing training specific to Diversity, Equality and Inclusion practices during their onboarding process and then annual training thereafter during their employment with SMI.

**1.8 Version Control:**

Version:	Detail:	Approved by:	Last approved:
1.0	First Issue following policy introduction and annual reviews	Paul Prisgrove	May 2019
1.1	Annual review	ESG Manager	Oct 2023
1.1	Annual review – updates added to align with additional policies and procedures implementing within the business	ESG Manager	Nov 2024

