

Equity, Diversity & Inclusion Policy

1. Introduction

The Morson Group is committed to promoting equality of opportunity for all stakeholders and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

We do not discriminate or tolerate discrimination against colleagues based on any protected characteristics, namely: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. These principles of non-discrimination and equality of opportunity also apply to the way in which we treat visitors, clients, customers, suppliers and former colleagues.

This policy sets out the Morson Group commitment to equity, diversity, and inclusion and the behaviours we expect from all colleagues across the Group in line with this commitment. All colleagues have a duty to act in accordance with this policy at all times.

2. Scope

This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary) consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff (collectively “colleagues”).

3. Definitions

Equity

Morson Group are committed to the fair and just treatment of individuals, taking into account their unique circumstances, backgrounds, and needs. Access to recruitment, training, and promotion is granted solely on the basis of individual ability and merit.

Diversity

We recognise, understand, actively seek, and value differences between people and groups of people within our Group. We empower these individuals to work collaboratively.

Inclusion

All colleagues within Morson Group feel part of our workplace culture, that they play a key role in our success, and have equal access to all elements of our workplace, training, and career development.

Discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of a protected characteristic. For example, rejecting an applicant on the grounds of their race because they would not “fit in” would be direct discrimination. Direct discrimination can also cover discrimination by association or perception. Discrimination by association might occur where a person is discriminated against by reason of their association with a person who has a protected characteristic. Discrimination by perception happens when a person is discriminated against because they are thought to have a particular characteristic when in fact they don’t.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Harassment

Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This can include harassment by a third party such as a customer. Harassment, including sexual harassment, is dealt with further in our Anti-Bullying and Harassment policy.

Victimisation

Victimisation is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

4. Our Commitment

Morson Group is committed to ensuring that equality of opportunity is maintained in the following areas:

- Recruitment and selection
- Training and development
- Opportunities for promotion and transfer
- Conditions of service
- Pay and benefits
- Conduct at work
- Disciplinary and grievance procedures
- Termination of employment, including dismissal, redundancy, and retirement
- Working hours, flexible working and time off

We will not tolerate any acts of unlawful discrimination, harassment, or victimisation based on any of the protected characteristics outlined in Section 1, or of working pattern (e.g. part-time working or fixed term contracts).

Decisions relating to areas listed in section 4 above are granted on the basis of individual merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act 2010), and Morson Group are committed to encouraging all employees to take advantage of training, development, and progression opportunities.

We commit to taking complaints of discrimination, harassment, and victimisation seriously by fellow colleagues, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be viewed as misconduct, and appropriate action will be taken in line with the organisation's Disciplinary Procedure. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights and a criminal matter, such as in the case of sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

If you believe that you may have been discriminated against, you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment, including sexual

harassment, you are encouraged to raise the matter through the formal procedure under our Anti-bullying and Harassment Policy. If you are uncertain which applies or need advice on how to proceed, please speak with a member of the HR department.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Colleagues who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

Should the HR department be made aware of a breach of this policy through channels other than formal notification, for example as a result of informal discussion or observation, action may still be taken in line with our formal procedures.

We aim to create an inclusive working environment in which:

- The individual differences and diverse contributions of our employees are recognised by all as valuable to both our workplace culture and commercial success.
- Every individual feels welcomed, respected, supported, and valued.
- All colleagues benefit from the right processes, policies, tools and infrastructure to enable them to give their best.
- Everyone is treated with dignity and respect.

We seek to promote awareness and understanding of matters relating to equality, diversity, and inclusion through policies, training, guidance, and campaigns, both internally and with our external partners including clients, suppliers, and contractors.

We are committed to ongoing assessment of our policies and practices to identify and eliminate any disadvantage or exclusion of persons with protected characteristics and ensure that our colleagues are empowered to discuss equality, diversity and inclusion issues and raise any related concerns.

We are committed to the continuous improvement of the experience of equality, diversity, and inclusion within the organisation. Action is monitored, reviewed, and planned on a regular basis in line with the Group EDI Strategy.

5. Responsibilities

The Executive Board and Group HR Director have overall responsibility for the effective operation of this policy. Day to day operational responsibilities, including regular review of this policy has been delegated to the HR department.

All Colleagues

All colleagues are responsible for:

- Actively supporting and contributing to Morson Group's aim of providing an equal, diverse, and inclusive environment for all employees.
- Living our core value of Collaborative by embracing and celebrating a diverse workforce.

- Utilise resources provided by Morson Group in relation to the promotion of equality, diversity, and inclusion, including attending training, making use of toolkits and general information, and participating in EDI initiatives and activities.
- Provide feedback to their line manager and the HR department regarding continuous improvements that can be made to engender an equal, diverse, and inclusive working environment.
- Reporting any instances of discrimination, harassment, or victimisation that they encounter in the workplace.
- Understanding that they, as well as Morson Group as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow colleagues, customers, suppliers and the public.

Line Managers

All line managers are responsible for:

- Understanding and being familiar with this policy and communicating its expectations to their team members.
- Actively supporting and contributing to the implementation of this policy and its goals.
- Actively promoting expectations regarding equality, diversity, and inclusion to their team members.
- Aligning their behaviours to the Group values and commitments set out in this policy in order to lead by example.
- Creating a positive local working environment that is conducive to equality of opportunity, diversity, and inclusion.
- Encouraging their team members' participation in activities relating to equality and diversity.
- Actively participating in training around equality, diversity, and inclusion and seeking out additional advice and training where required.
- Supporting the implementation of this policy.

HR Department

The HR department are responsible for:

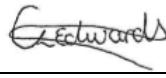
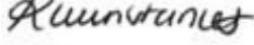
- Providing suitable training to managers and colleagues about their rights and responsibilities under this policy.
- Ongoing monitoring and development of the Group EDI Strategy.
- Ensuring any reports of discrimination, harassment, or victimisation are dealt with appropriately in line with the Disciplinary Policy.
- Regular review of this policy

Further details can be found in the Morson Group Recruitment and Selection Procedure.

6. Amendment Record

Issue	Amendments	Date	Issued By
14	Policy Reviewed and rebranded. Refer to v.13 for old amendment record.	September 2024	Melissa Carney
14	Reviewed – no change.	September 2025	Chloe Edwards
15	Rebrand	December 2025	Katie Hancock

Document Control

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