

Diversity, Equity, and Inclusion (DEi) Policy

Having an inclusive culture that enables everyone to thrive, feel a sense of belonging and where their differences are valued, is essential for ODGroup (including OD Projects (Holdings) Ltd, OD Interiors Ltd & OD Create Ltd) to achieve its vision to be the most dynamic construction services company.

Purpose

This policy sets out ODGroup's commitment to diversity, equity, inclusion and belonging. It describes how we will ensure equal opportunities and adopt equitable practices to build a diverse and inclusive workforce where everyone has a sense of belonging.

Scope

This policy applies to the Company's employees, whether permanent, temporary, part-time or on fixed-term contracts and to job applicants. It also applies to clients, subcontractors and consultants working on behalf of ODGroup.

ODGroup's Commitments to Diversity, Equity and Inclusion

Our DEi policy sets out the activities and initiatives we will implement to help us achieve our aim of diversifying the workforce and creating a culture that enables everyone to thrive and feel a sense of belonging. These will be underpinned by the following commitments. We will:

1. Create a sense of belonging for all our people by raising awareness of, and celebrating, diversity in all its forms.
2. Have a zero-tolerance approach to discrimination, bullying and harassment, and non-inclusive behaviours will not be tolerated.
3. Take proactive steps to support people to bring their whole selves to work. This includes, and is not limited to, transitioning at work, menopause, returning from family leave and practicing religions within the workplace.
4. Make timely workplace adjustments for people who need them including people with disabilities or long-term conditions - to remove any unfair disadvantages or discriminatory practice.
5. Take proactive steps to make sure that everyone, including under-represented groups, can thrive, using Positive Action where necessary and appropriate. For example, offering training to certain groups, such as ex-armed forces personnel, as a way of developing and supporting them to progress; or working with a charity partner to target the recruitment of certain individuals such as those who are neurodiverse.
6. Ensure that everyone is treated fairly at every stage of the recruitment process, targeting the recruitment of under-represented groups where appropriate. For example, by offering a guaranteed interview for certain groups - disabled people and those from the Armed Forces where the essential criteria have been met.
7. Ensure that everyone has an opportunity to progress their careers at ODGroup by operating robust, equitable and transparent development and promotion processes.
8. Support ODGroup's leaders and managers in implementing this policy through a programme of appropriate learning interventions.
9. Implement, support and work closely with employee-led networks to celebrate diversity, identify improvements to employment practices and co-produce solutions that include, but are not limited to, policy changes and guidance targeted to specific groups such as line managers
10. Make sure that we keep people up to date with our progress against the commitment set out with timely, accessible, and inclusive communications.

11. Work closely with our supply chain partners, clients, and potential clients to ensure they share our commitment to creating a workplace that is healthy, safe, and free from discrimination for everyone.
12. Regularly review the success and impact by monitoring the employee lifecycle (and other relevant activities) by various demographics, taking corrective action where necessary and celebrating successes where appropriate.

Definitions

Defined below are the main terms used in this policy.

Diversity

Is recognising and respecting the visible and invisible differences between each other. It is about all the other ways that we are different: including different ways of thinking and working, social and economic backgrounds etc.

Equity

Is recognising people's unique circumstances and giving them what they need to make things as fair as possible. This might mean treating people differently in accordance with their needs and will have the effect of removing barriers for these people or groups to ensure equality.

Inclusion

Is a working culture where differences between people are valued, respected and championed. We will proactively remove unnecessary barriers that prevent groups and individuals from participating and succeeding at ODGroup.

Belonging

Is a feeling of security and support that comes from a sense of acceptance, inclusion, and identity. When our people feel a sense of belonging, they will share ideas, speak up confidently and fully contribute to their work at ODGroup. Belonging is the key to forming and maintaining lasting, positive and significant relationships with people and to ODGroup and its values.

Positive Action

Are the proactive measures that may be taken to encourage participation, engagement, recruitment and representation from under-represented groups.

Discrimination

Is when a person is, directly, or indirectly, treated less favourably because of their protected characteristics. This includes when someone is perceived to have a protected characteristic or when they associated with someone who does have the protected characteristic.

Bullying

Can be, although is not limited to, abusive, offensive, malicious, insulting, intimidating or manipulative behaviour. Bullying is unlikely to be an isolated incident and is often repeated and persistent.

Harassment

There are three types of harassment that are prohibited, and these are outlined below. (see your local Dignity at work policy for more detailed information).

- **Any unwanted conduct.** This is conduct that has the purpose or effect of violating your dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can be a single incident or a repeated pattern of behaviour.
- **Less favourable treatment:** being treated less favourably because you submit to, or reject, sexual harassment or harassment related to sex or gender identity.
- **Sexual Harassment:** when someone is subjected to unwanted conduct which is of a sexual nature. It is not necessary for the conduct to be sexually motivated, only sexual in nature.

Non-inclusive behaviour

Is any language, action or absence of action, that has the impact of excluding someone - whether this was intentional or not. This includes micro-aggressions which are tiny, casual insults and inappropriate behaviour directed at marginalised groups. Whilst these acts can sometimes be deliberate, they can also be committed with little conscious awareness of their meaning and effect. Micro-aggression can be viewed as harassment.

Roles and Responsibilities

Role	Responsibility
Board has overall responsibility for:	<p>Ensuring that the principles of diversity, equity and inclusion are consistently applied.</p> <p>Providing visible leadership on, and advocating for, DEi, taking steps to educate themselves and others where necessary.</p> <p>Ultimately accountable for meeting all the commitments set out, particularly - though not exclusively - for work that is within their business unit/ functional area.</p>
Managing Directors, Enabling Department Directors and Heads,	<p>Providing visible leadership on DEi throughout all activities in their business unit/ department/ team.</p> <p>Ensuring that employees in their business unit/ department/ earn embed the principles of DEi within their roles.</p>
Line Managers are responsible for:	<p>Recognising and applying DEi principles in the recruitment and management of employees.</p> <p>Providing necessary support to employees such as securing adjustments to remove barriers for disabled employees.</p>
<p>Head of Inclusion and Wellbeing/ Wider HR team are responsible for developing and supporting the implementation of the DEi related policies and activities in pursuit of a more diverse workforce and culture that enables everyone to thrive and feel a sense of belonging, by:</p>	<p>Keeping up to date with relevant legislation and best/ proven practice.</p> <p>Advising and supporting managers and employees on relevant issues.</p> <p>Supporting investigations into complaints about alleged breaches of this (and related) policy as it relates to employees and our supply chain.</p> <p>Ensuring guidance is provided to allow People policies to be applied fairly and transparently.</p> <p>Supporting employee networks and ambassadors.</p> <p>Ongoing monitoring of the application and impact of this policy</p>
<p>Employee Networks and DEi Ambassadors will act as:</p>	<p>A. critical friend, highlighting any non-inclusive behaviors/ discriminatory practice as well as sharing ideas and suggested solutions.</p> <p>Work with the Head of Inclusion and Wellbeing to disseminate and champion best practice.</p>
<p>Marketing and communications teams are responsible for:</p>	<p>Ensuring that all ODGroup's communications materials are inclusive and accessible to all.</p>
<p>You have a responsibility to support ODGroup's commitment to DEi by:</p>	<p>Taking care to treat others fairly and with respect.</p> <p>Report any discrimination and non-inclusive behavior or practices that you witness using the appropriate channels.</p> <p>Complete the mandatory e-learning and any other learning opportunities that may be introduced from time-to-time.</p>

Process to follow in the event of a concern about how you have been treated.

Everyone has a part to play in creating an inclusive culture; and everyone has a right to be treated with respect and not be discriminated against.

Any allegations of breaches of this policy will be treated seriously and all complaints will be investigated thoroughly in line with the Dignity at Work and/or Grievance Procedure and may result in disciplinary action up to and including dismissal, being taken.

If you have concerns about discrimination, harassment, bullying or other non-inclusive behaviours and practices, you can contact either your line manager or HR representative for your area. Alternatively, you can discuss the matter with the Head of Inclusion and Wellbeing.

Support and Advice

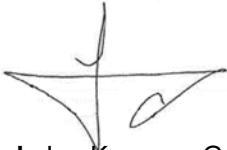
There are several internal and external support services available. These include:

- The HR contact for your area
- Employee Assistance Programme - a free, independent, and confidential resource provided by Health Assured designed to help you deal with any personal or professional problems which could be impacting on your health and wellbeing.
- Mental Health First Aiders - a network of employees who have been trained to spot the signs and symptoms of poor mental health, and to listen and signpost appropriate. You can contact an MHFA from the list.

Related documents

- Dignity at Work policy
- Grievance
- Disciplinary policy

Date: 02 May 2025

A handwritten signature in black ink, appearing to read 'Jon Kearney', written over a faint, light-colored signature line.

Signed: Jon Kearney, Group Managing Director