



## **Diversity, Respect and Inclusion Policy**

### **EXECUTIVE SUMMARY**

1. This policy explains the principles, rules and procedures through which the Group can maintain its high ethical standards and protect its reputation against any allegations of discrimination or harassment. Its successful implementation requires proactive adoption and compliance by each of its employees.

2. This policy will be communicated to all employees of the Group, as well as relevant third parties, such as business partners, suppliers and other necessary individuals and entities. Some individual may receive additional training and support to help them in adopting this policy.

### **About this policy**

We operate in diverse communities which are reflected in our workforce and among our customers, suppliers and other stakeholders. Having a diverse workforce helps us understand the needs of our customers, brings innovation and engagement. We are committed to creating an inclusive working environment where individuals from different backgrounds and of different abilities can fulfil their potential and where individualism is celebrated. A place where people want to work because they are treated with dignity, feel included and are not discriminated against.

Alongside our commitment to diversity is our commitment to eliminate discrimination, bullying and harassment at work. Our employment policies and practises reflect a culture where we make decisions solely on the basis of individual capability, attitude and behaviour and potential reflecting the needs of our business.

Protected characteristics covered by legislation are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity/paternity, race (including ethnic origins, nationality and colour), religion or belief, sex and sex orientation. As well as these characteristics we will ensure that our workers are not treated less favourably because of factors such as class and social background, spent convictions, mental illness, part-time or fixed term working and other individual characteristics.

### **SCOPE AND APPLICATION**

This policy is managed by the Group Chief People Officer, approved by the Pennon Group Board and enforced without discrimination across the Pennon Group and its subsidiary companies ("Group") and applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.



### **Applying this policy**

We all must be aware of our personal responsibility to each other, our customers, contractors, suppliers and visitors. We should seek to promote equality of opportunity, diversity, respect and inclusion and seek to eliminate unfair or unlawful discrimination throughout our business including in our:

- recruitment and selection
- terms and conditions of employment
- working environment
- training and development
- promotion and career progression
- redundancy and redeployment

We expect everyone to be aware of this policy and comply with it. If you witness, or are made aware of, anything that runs counter to this policy then please take action; this may include asking for the action to stop, or reporting it to a manager or HR.

From time to time, we may take positive action to target development or recruitment opportunities in areas where we have under-representation. This should not be confused with discrimination and can include such activities as mentoring, development programmes for groups of protected characteristics and support programmes to remove barriers. Within the area of recruitment, it is permissible for organisations to:

- widen its attraction activity to build a more diverse candidate pool,
- ensure groups are not identifiable in sifting processes and
- exercise the ability to favour an under-represented group as a tie-breaker, where candidates are of equal merit.

### **Colleague Personal Information**

It is our policy to hold personal information such as ethnicity, information on disability and nationality, so that we may ensure our actions mirror our policies and their intent. This supports activities such as mandatory reporting on pay gaps, monitoring progression of colleagues from minority groups and providing positive support to create better representation of all groups at all levels of the business.

### **Breaches of this policy**

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy. Serious cases of deliberate discrimination or harassment may amount to gross misconduct resulting in summary dismissal.

It is not possible to cover every situation and we ask that all Pennon staff remain alive to discrimination or harassment.



### **What do you do if you feel discriminated, harassed or bullied?**

If you feel that you are being discriminated, harassed or bullied, consider whether you are able to speak with the person responsible. If you can, then you should explain clearly that their behaviour is not welcome or makes you uncomfortable and ask them to stop.

If doing this is too difficult or embarrassing, you should speak to your line manager or HR who can provide advice and assistance in resolving the issue.

Complaints will be investigated in a timely and sensitive way by someone with the right experience. Details of the investigation and those involved will be disclosed on a "need to know" basis. Once the investigation is complete, you will be informed of the next steps. You can raise the matter in line with our Grievance Policy or through our Anti-harassment and Bullying Policy as appropriate.

### **Complaints will be treated in confidence and investigated as appropriate.**

Where the matter is more serious, where you feel that your line manager has not addressed your concern, or where you prefer not to raise it with them for any reason, you should contact one of the following:

- Group Chief People Officer
- Group General Counsel and Company Secretary or Head of Legal Compliance;
- Our confidential Speak Up telephone hotline.

Please be assured that there will be no victimisation or retaliation against employees who raise a genuine concern. However, making false allegation deliberately in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

Our diversity will help us create a successful and sustainable business.