

STELRAD RADIATOR GROUP

Group Equality, Diversity and Inclusion Policy

March 2022

Contents

1.	Message from our Chief Executive.....	3
2.	Scope	3
3.	Purpose	3
4.	Aims.....	3
5.	Commitment to Equality, Diversity and Inclusion	4
6.	Dealing with Discrimination.....	5
7.	Definitions.....	5
8.	Unlawful Discrimination.....	5
9.	Types of Discrimination.....	5
10.	Positive Action	6
11.	Responsibility	6

1. Message from our Chief Executive

As an international Group we recognise and enjoy the benefits of working with a diverse group of colleagues from around the world. I am fully committed to building upon these foundations to ensure that each business within the Group fully embraces the value of having a workforce locally that is truly representative of all sections of society where employees feel respected and are able to give their best. The diversity of our workforce has a critical role to play in delivering our purpose of helping to heat homes sustainably. It fosters a culture of innovation and creativity which is key to sustaining our long-term success. There is no place in our organisation for anything other than meritocracy, integrity respect, openness, fairness, transparency and inclusivity.

2. Scope

This policy applies to all employees within the Group wherever located. It is not intended to replace specific national policies which have been developed to ensure compliance with local legislation, however it should be seen as an overarching supplementary policy which establishes the minimum standards expected by the Group. Local policy must be reviewed and updated to incorporate any aspect of this policy which is not currently present in local policy.

In addition, this policy must be observed by all agency staff, contractors, consultants and any other individual working for, at, or on our behalf. Whilst it cannot extend to the conduct and actions of people working within our supplier and customer base any breach of the principles contained within this policy by individuals working within that base will not be tolerated and should be escalated to a manager and/or the HR team.

Equal opportunities practice is developing constantly as social attitudes and legislation change. We will keep our policies under review and we will implement changes where these could improve equality of opportunity. This commitment applies to all of the Group's employment policies and procedures, not just those specifically connected with this policy.

3. Purpose

This policy sets out our determination to achieve a culture that values ability, difference, openness, fairness, transparency and inclusivity.

4. Aims

The Group is a committed Equal Opportunities employer and we aim to:

- Prevent discrimination, eliminate prejudice, promote inclusion and celebrate diversity within the organisation
- Be fair in our dealings with all people, internally or externally, with whom we have relationships, taking into account the diverse nature of their culture and backgrounds
- Ensure that equality, diversity and inclusion is embedded in everything we do

Our policy covers all aspects of equality including race, religion or belief, sex, gender reassignment, marriage and civil partnership, pregnancy, maternity and other matters relating to parental responsibility, sexual orientation, disability and age.

It underlines our commitment to develop as an open and inclusive organisation, in keeping with our values and our Code of Conduct.

We are committed to ensuring compliance with all applicable equality laws, statutes, regulations and codes in force both in the UK and in each country of operation across the Group.

5. Commitment to Equality, Diversity and Inclusion

We believe that everyone stands to benefit when we embrace and value the diversity of thoughts, ideas and ways of working that people from different backgrounds, experiences and identities bring. It helps our employees to grow and learn, enables them to realise their potential, improves decision-making, boosts engagement and innovation.

To this end, we have made the following commitments:

- To create an environment in which individual differences and the contribution of all team members are recognised and valued
- To not tolerate any form of unacceptable behaviour, harassment, discrimination, bullying (including cyber bullying) or victimisation in any area of employment, in our relationships with suppliers and partners, or in the provision of our services to our customers
- To ensure that no employee or candidate for employment, permanent or otherwise, is subject to unlawful discrimination or unconscious bias, either directly or indirectly, on the grounds of age, disability, gender reassignment, marriage and civil partnership, parental responsibility (including pregnancy and maternity, paternity, adoption or caring) race (including colour, nationality or ethnic origin), religion or belief, sex or sexual orientation. This commitment applies to all aspects of employment, including:
 - Transparent recruitment and selection processes based on merit
 - Interview and selection procedures
 - Ensuring a work environment free from discrimination
 - Training opportunities
 - Promotion and career development opportunities
 - Terms and conditions of employment including pay, access to employment related benefits and facilities and requests for flexible working
 - Grievance handling and the application of disciplinary procedures
- To, where reasonable, make tailored adjustments and adaptations to accommodate the needs of our employees, including those seeking to join Stelrad
- To provide guidance and training to employees on diversity, inclusion and equality of opportunity
- To encourage anyone who feels they have been subject to or witnessed discrimination to report their concerns either directly to their Line Manager via their local Grievance Procedure or the Group Whistleblowing Procedure
- To make every person aware of their personal responsibility for implementing and promoting equal opportunities in their day to day dealings with people and encourage employees to treat everyone with dignity and respect.
- To monitor the effectiveness of our commitment to diversity and inclusion and the supporting policies and procedures.

- To regularly review all our employment practices, policies and procedures to ensure compliance with the requirements of these statements.

6. Dealing with Discrimination

Unacceptable behaviour, harassment, discrimination, bullying (including cyber bullying) or victimisation of any individual is contradictory to our aspirations for a supportive working environment and will not be tolerated.

All complaints will be dealt with in a sensitive and effective manner. They will always be taken seriously, thoroughly investigated and where appropriate, our Disciplinary Procedures will be followed.

7. Definitions

What we mean by Equality, Diversity and Inclusion

Equality: ensuring people are not unjustifiably treated less favourably. Specifically, in the UK, on the basis of one or more protected characteristics defined by the Equality Act 2010 and other anti-discrimination legislations.

Diversity: recognising and valuing the benefits of different perspectives, backgrounds and experiences. Also, identifying and acknowledging under-representation, and taking active steps to address it through initiatives, policies, and systemic change.

Inclusion: actively embracing people with diverse perspectives, backgrounds and experiences. Creating an environment that enables us all to feel a sense of belonging, and where we can achieve the extraordinary together.

Equality, diversity and inclusion are not identical, but they are reliant on one other to tackle discrimination. For example, we cannot achieve real inclusion unless we embrace equality and diversity. We often use diversity as an umbrella term to describe any of our equality, diversity and inclusion initiatives.

8. Unlawful Discrimination

When a person or group of people is treated less favourably than another person or group of people would be treated based on their protected characteristic as defined by UK legislation or other comparable legislation outside of the UK.

9. Types of Discrimination

Direct discrimination – treating someone unfairly because of their protected characteristic as defined by UK legislation or other comparable legislation outside of the UK.

Indirect discrimination – a practice, policy or rule applied to everyone that may at first appear fair or neutral, but puts people of a particular protected characteristic, as defined by UK legislation or other comparable legislation outside of the UK, at a disadvantage.

Discrimination by association – a person is treated unfavourably because of another person's protected characteristic, as defined by UK legislation or other comparable legislation outside of the UK.

Discrimination by perception – when someone is treated unfairly because others believe they have a protected characteristic as defined by UK legislation or other comparable legislation outside of the UK.

Victimisation – a person is treated less favourably because they have or is expected to complain about discrimination.

Harassment – unwanted conduct that has the purpose of violating a person’s dignity and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

Bullying – as persistent, offensive, abusive, intimidating or insulting behaviour, abuse of power or unfair sanctions which make the recipient feel upset, threatened, humiliated or vulnerable, which undermines their self-confidence and which may cause them to suffer stress.

10. Positive Action

When an employer or organisation takes positive steps to help or encourage certain groups to participate in activity or overcome or minimise disadvantages. For example, offering leadership development training to women when an organisation has identified that women are under-represented in senior leadership roles.

This measure stops short of allowing preference to be given to less qualified applicants (e.g. employing or promoting an individual solely because they are from an under-represented group regardless of their suitability for the position).

11. Responsibility

Our Board has overall responsibility for ensuring that we operate within a framework of equality of opportunity.

Our Executive team have overall management responsibility, delegated to all managers throughout the organisation.

All employees have a duty to support and uphold the principles of our commitment to equality, diversity and inclusion and its supporting policies and procedures.

This statement will be reviewed regularly and if necessary, revised in the light of legislative or organisational changes.

For further information please contact your local HR department.