

EQUALITY, DIVERSITY AND INCLUSION POLICY

Introduction

Redrow Homes is committed to continuously promoting Equality, Diversity and Inclusion (ED&I) throughout the business to build a culture that is inclusive to all, actively values difference and ensures everyone is treated fairly. This Policy and its associated initiatives will deliver an ED&I agenda which focusses on attracting and retaining a diverse workforce which promotes an inclusive environment, where all employees are given equal access to opportunities allowing them to contribute their best work and develop to their full potential.

1. Purpose

This Policy sets out Redrow's approach to delivering, supporting and maintaining a sustained culture of ED&I in our workplace.

2. Scope

All individuals have a responsibility for ED&I at Redrow. This Policy applies to all employees, preferred supplier agency workers, contractors and individuals working for or on behalf of Redrow Homes Limited as well as those who may have direct or indirect relationships with any customer or potential customer of Redrow Homes Limited.

This Policy and all associated initiatives should be implemented and promoted by all individuals so that ED&I is considered and demonstrated in all aspects of the business so it becomes embedded in everything we do.

3. What is an Equality, Diversity and Inclusion Policy?

Having an ED&I Policy enables Redrow to send out a strong message of commitment and direction to all that inclusivity is key to achieving a fair and diverse work environment where all values within each area of ED&I are embedded throughout the business.

4. Redrow's ED&I Policy provides direction and guidance to:

- promote inclusion, prevent discrimination and bias, and embrace diversity within Redrow in all stages of the employee journey from Redrow's image on social media platforms and Redrow's websites to job adverts, recruitment and selection, induction, training, manager and co-worker relationships, working arrangements, recognition, appraisals and career progression through to exit interviews;
- promote inclusive and fair practice in all relations with employees, preferred supplier agency workers, contractors, suppliers and customers, taking into account the diverse nature of cultures, perspectives and backgrounds and local and regional needs;
- all Redrow employees and third party partners to increase awareness and take ownership of our responsibilities in relation to ED&I.

5. What is Equality, Diversity and Inclusion?

The following section provides definitions of each and includes specific examples.

➤ What is Equality?

Equality is about making sure everyone is treated fairly by removing barriers, eliminating discrimination and making sure everyone is given equal access to opportunities which allow them to contribute fully and fairly in the workplace.

The Equality Act 2010 prohibits all employers from discriminating against, harassing or victimising individuals with protected characteristics, these include;

- **age** – this protects individuals of all ages.
- **disability** – a disabled person is defined as someone who has a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out day to day activities.
- **sex discrimination** – the Act protects individuals from discrimination because of their gender.
- **gender reassignment** – the act provides protection for transsexual people; someone who proposes to, starts or has completed a process or part of a process, to change their sex.
- **pregnancy and maternity**- individuals are protected against discrimination on the grounds of pregnancy and maternity during the period of their pregnancy and any maternity leave to which they are entitled.
- **race** – people are protected from discrimination because of their race, this includes colour, nationality, ethnic or national origin.
- **sexual orientation** – the Act protects bisexual, gay, lesbian and heterosexual people from discrimination.
- **religion or beliefs** – individuals are protected on the grounds of their religion or belief or if they don't have a particular religion or belief.
- **marriage and civil partnership** – employees who are married or in a civil partnership are protected against discrimination.

Equality recognises that historically certain groups of people with protected characteristics have experienced discrimination, the main types of discrimination include:

Direct discrimination – this occurs where one person is treated less favourably than another because of a protected characteristic.

Example: Refusing to promote a pregnant employee on the basis that they are shortly due to go on maternity leave, would be direct discrimination on the protected characteristic of the employee's gender. Other types of direct discrimination are:

Associative discrimination - when someone is treated unfavourably on the basis of another person's protected characteristic.

Example: A candidate who has been told they are getting a job is suddenly deselected after revealing they have a severely disabled child with complicated care arrangements. The withdrawal of the job offer could amount to discrimination because of their association with a disabled person (disability being a protected characteristic).

Perceptive discrimination - the discrimination is based on perception, rather than reality, when someone is treated unfavourably because others believe they have a protected characteristic, even though in reality they don't have it.

Example: Where a manager rejects a competent applicant for a job on the basis that they wrongly thought that the applicant was gay following their interview.

Indirect discrimination - this occurs when an unjustifiable requirement or condition is applied, which appears to be the same for all, but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate.

Example: A manager insisting that someone has English as a first language.

Victimisation - this is where an employee is treated less favourably than others because they have asserted rights against Redrow or assisted a colleague in doing so.

Example: Victimisation may occur where an employee has raised a genuine grievance against their manager and is not interviewed for a suitable vacancy as a result or provided evidence for a colleague during a complaint investigation and then experienced less favourable treatment.

Bullying and harassment - Harassment and bullying may be against one or more people and may involve single or repeated incidents across a wide spectrum of behaviour, ranging from extreme forms of intimidation, such as physical violence, to more subtle forms such as ignoring someone. It can occur without witnesses, and takes place in face-to-face interactions, as well as online. Including, but not limited to:

- unwanted physical contact
- unwelcome remarks about a person's age, dress, appearance, race or marital status, jokes at personal expense, offensive language or gossip
- posters, graffiti, obscene gestures, flags, bunting and emblems
- isolation or non-cooperation and exclusion from social activities
- unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Disability discrimination – our duty to make reasonable adjustments

Where a disabled employee is at a substantial disadvantage compared with employees who are not disabled, there is a duty to take reasonable steps to remove that disadvantage by:

- changing provisions, criteria or practices within the individual's role;
- changing or removing a physical feature or providing a reasonable alternative way to avoid that feature;
- providing auxiliary aids.

An adjustment should, as far as possible, remove or reduce any disadvantage faced by a disabled person.

Whether an adjustment is reasonable depends on all the circumstances including:

- how effective the change will be in avoiding the disadvantage an individual you would otherwise experience because of their disability;
- how practical it is for Redrow to make it;
- the cost and resources available to Redrow;
- whether financial support is available to help Redrow make the adjustment/s.

The test of what is reasonable is ultimately objective and not simply a matter of what a manager may personally think is reasonable. In all instances the manager should contact their HR Business Partner for advice and support.

➤ **What is Diversity?**

Diversity is the respect that all individuals are unique, it is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills and experiences, beliefs, ideas and using those differences to create a productive and effective workforce.

It also creates an environment where individuals can be themselves, feel included and accepted and where they feel empowered and valued for what makes them different. In particular in terms of age, gender, ethnicity, religious belief, disability, sexual orientation, nationality, neurodiversity and socio-economic background.

Differences can include visible and non-visible factors; for example, personal characteristics such as culture, personality, work-style, accent or language.

It is therefore important to recognise that a 'one-size-fits all' approach to managing people does not achieve fairness and equality of opportunity for everyone. People have different personal needs, values and beliefs and for them to feel included will differ from one individual to another. Good people management needs to be consistently fair but also flexible and inclusive to support both individual and business needs.

➤ **What is Inclusion?**

Inclusion is engaging the uniqueness, abilities, beliefs, backgrounds and ways of working of all employees and third party partners. It refers to an individual's experiences within the workplace and the extent to which they feel valued and included. Inclusion brings diversity and allows individuals to feel comfortable when contributing, whether this is within an interview, a team meeting or a one to one with their manager.

Every individual has unique perspectives; this difference in thought and outlook, within a culture of listening, helps to generate new ideas and ways of working. The more inclusive our environment, the more likely individuals will contribute constructively and fulfil their potential, leading to a workforce that feels engaged. This has a positive impact on employee retention and attendance which should lead to delivering better outcomes for the business.

6. How will Redrow put this Policy into practice?

The Policy is sponsored by Karen Jones, Group HR Director, who will be the lead on the Policy and implementation throughout the business. This will be introduced through the following initiatives;

- **ED&I Working Group** - the volunteer members will act as ED&I representatives to support and facilitate delivery whilst promoting the policy and its principles throughout their divisions. They will represent colleagues and feedback any suggestions and ideas to ensure ED&I is always developed and maintained. There is an opportunity for every business division to be represented on the ED&I Working Group.
- **Communications and information sharing** – initiatives will continuously be implemented to raise awareness of the ED&I Policy throughout the business. There is also a dedicated page on our intranet for the Representatives and all Redrow employees to share all related information.
- **Anonymous feedback** – the ED&I Representatives will play a key role throughout the business as points of contact, however; it may be preferred for some concerns to be shared anonymously due to their nature. Therefore a facility will be available to enable individuals to share any concerns or ideas anonymously. In addition, employees also have Redrow's assistance programme should individuals have any concerns that they wish to talk through in confidence and obtain advice.
- **Employee journey** - ED&I will be embedded throughout all stages of an employee's journey ensuring all individuals receive fair and equal treatment. Each stage is defined below:

Recruitment and Selection

This is a key stage where equality of opportunity is essential. Redrow's website and associated social media channels will portray Redrow's ethos regarding ED&I, including a published summary document of this Policy.

All recruiting managers will receive training on ED&I and unconscious bias which will be supported by HR.

All forms of appropriate media should be considered and used during the advertising process to ensure a diverse pool of candidates are targeted along with the content of job adverts and job descriptions being a true reflection of the role.

Shortlisting and interviewing must be carried out with fair assessment criteria and any adjustments required must be considered and accommodated. All recruitment and selection for employment at Redrow will be on the basis of aptitude and ability.

Where possible, Redrow will capture applicants' diversity demographics as part of the recruitment process to promote the elimination of unlawful discrimination. Redrow will also collate diversity data of all new employees and gather the data from all remaining employees to enable us to report on each of these areas. The disclosure process will not be compulsory and all GDPR requirements will be followed.

Onboarding and Induction

This Policy will be shared with all new employees through our onboarding portal. The portal is made available to an individual upon accepting a position with Redrow. It will also be shared with any relevant information and initiatives during the induction process ensuring that Redrow's ED&I agenda is communicated at the earliest opportunity.

Learning and Development

Training and development within Redrow should be made available so learning opportunities are accessible to all employees.

Promotion and career progression

All promotion decisions will be made on the basis of performance, merit and qualifications. Promotion opportunities will be monitored to review equality of opportunity at all levels.

Employment benefits, terms and conditions and facilities

All employment benefits, terms and conditions and facilities available to employees will be reviewed on a regular basis so that access is fair to all and so appropriate conditions and facilities can be made available to meet the needs of all employees.

Managers must always seek opportunities to implement ED&I in all aspects of their role in order to support their employees in line with business needs, for example this may involve a review or making adjustments to an individual's working environment or working pattern. This could be a temporary change to working hours to accommodate a religious festival for an employee or a permanent adjustment for an individual who has caring responsibilities.

All employees deserve the opportunity to develop, work in a safe and supportive environment, be fairly rewarded and recognised and have a meaningful voice on issues that may affect them.

7. Roles and responsibilities

For Redrow to deliver and continuously sustain a culture of supporting and promoting ED&I, it is essential that all parties take ownership, lead by example and work together to embed this everyday. Therefore;



Redrow will:

- provide training to all members of the Executive and the senior management teams on ED&I and unconscious bias to ensure Redrow is led by inclusive and effective leaders;
- encourage and embrace diversity in all aspects of the business;
- aim to encourage an inclusive workplace, where the similarities and differences of colleagues are embraced in an environment where employees can be their best self. Stories and case studies will be shared through communications to promote this;
- promote equality of development and opportunity for everyone through Redrow's performance management processes and Group Learning and Development department;
- develop a culture where ideas can be raised and challenged in a respectful way to arrive at the best decisions;
- understand and support the unique and diverse needs of customers and their communities;
- liaise with sub-contractors and third party partners to work with them to actively support Redrow in working towards a diverse and inclusive culture through sharing this Policy and our initiatives and to encourage feedback so we can continue to work together and improve our working relationships.

Directors and Managers will:

- undertake training on ED&I and unconscious bias to equip them with the skills and knowledge to lead by example and make all employees aware of their responsibility for promoting ED&I in the workplace;
- have a duty to engage the principles of this Policy and act in accordance with it, behaving in a way that is respectful of others;
- be aware of different cultures and customs and champion the benefits that diversity can bring;
- implement recruitment and selection processes that are open and fair and that enable the selection of the individual based on relevant and applicable skills and ability;
- consistently support and encourage training for all employees including progression and application of employee benefits fairly and consistently;
- provide an environment where all employees can perform to the best of their abilities, ensuring there are opportunities for their team to meet for general catch-ups and opportunities to raise any concerns in confidence;
- consider and accommodate any requests for reasonable adjustments from job applicants or employees;
- respect the confidentiality of colleagues and team members;
- induct all new employees so they are aware of Redrow's approach to ED&I;
- challenge or report any inappropriate behaviour in a respectful and professional way;
- treat all colleagues, customers and partners with respect at all times; including any engagement on personal social media accounts, regardless of whether the individual can be identified as working with, or for Redrow;

- look to identify opportunities to introduce ED&I through practical changes to the working environment or additional training or support and seek feedback from team members;
- welcome different ways of thinking, encourage innovation and a culture of voicing suggestions where things could be done better;
- promote an environment free from discrimination, harassment, bullying and victimisation and tackle any behaviour that breaches this.

Employees will:

- undertake training to understand the principles of the ED&I Policy and their responsibility for the promotion and application of ED&I in the workplace;
- have a duty to engage the principles of this Policy and act in accordance with it, behaving in a way that is respectful of others;
- acknowledge and respect other peoples' points of view and help them understand theirs;
- treat colleagues, customers, and partners with respect at all times; including any engagement on personal social media accounts, regardless of whether the individual can be identified as working with, or for Redrow;
- be encouraged to share any new ideas they have;
- understand how to challenge or report any inappropriate behaviour in a respectful and professional way and be clear on the procedure for raising concerns or making a complaint, should they feel they are being treated unfairly;
- have the opportunity to volunteer on the ED&I Working Group and/or become an ED&I rep within their Division;
- treat others with dignity at all times, and not discriminate against, harass, bully or victimise any other individual.

HR will:

- support all managers and employees in understanding the principles of the ED&I Policy and their responsibility for the promotion and application in the workplace;
- embrace the principles of this Policy, applying them in their day to day roles;
- take any necessary steps so that job applicants and/or employees with protected characteristics do not experience disproportionate disadvantage;
- support and advise managers and employees in considering and accommodating any reasonable adjustments;
- continuously review HR practices ensuring ED&I is embedded within our policies and feedback is taken into consideration e.g. recruitment, case management and ongoing development and succession;
- carry out all statutory requirements and report appropriately on any ED&I requirements, e.g. Gender Pay Report;
- monitor workforce and recruitment data for Redrow to inform our practices and review our approach.

L&D will:

- consider the ED&I principles in all related learning and development including but not limited to induction, management development training and new director training;
- provide e-learning and training resources so they are inclusive and accessible to all.

Commercial will;

- liaise with all sub-contractors, preferred supplier agencies, consultants and suppliers, ensuring this Policy is shared and the principles are embedded by all our third party partners.

8. Complying with the Policy

All employees should treat each other with dignity and respect whilst at work and should not tolerate any form of intimidation, victimisation, bullying or harassment. If an individual believes that they may have suffered discrimination because of any of the protected characteristics defined in this Policy, they should discuss this in the first instance with their manager or HR Business Partner. They may then decide as an alternative to raise the matter through Redrow's Harassment, Bullying and Victimisation procedure, the Whistleblowing procedure (in the Employee Handbook) or via Redrow's Grievance Procedure.

Redrow's assistance programme is available for help and advice to all employees, sub-contractors and family members sharing the same home address.

All complaints or grievances will be taken seriously and dealt with promptly and confidentially in the defined timescales. Employees found to have breached the ED&I Policy may be subject to disciplinary action and which ultimately may result in dismissal.

9. Monitoring and Review

Redrow will collect, monitor and analyse diversity data provided by employees and job applicants to make sure Redrow's employment processes are fair and are achieving the aims of this Policy. Processing and monitoring of data will be carried out in strict confidence and in accordance with Redrow's Employee Privacy Notice and GDPR processes. Employees are not obliged to provide the data requested.

10. Other Redrow policies and procedures

This Policy should be read in conjunction with other policies and procedures including the Grievance Policy, Harassment, Bullying or Victimisation procedure, Whistleblowing procedure and Social Media Policy. These are available on the intranet or from the HR department.



11. Policy review

The Policy will be regularly reviewed by the Company and may be ended or amended at any time. The Company may omit any element of this Policy where it considers it appropriate.

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