

RWS Group

# Diversity, Equity and Inclusion Policy

**Author:** Carla Matthews, Eva Luskova

**Approver:** Jim McHugh

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## 1 Document history

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## 2 Introduction

RWS is committed to the principles of diversity, equity of opportunity and inclusion, and recognises the importance of always adhering to these principles. All that we do will reflect our approach to diversity, equity, and inclusion in practice. Diversity, equity, and inclusion together form a positive approach to recognise that everyone is different and can make and bring their own unique contribution, experience, knowledge, and skills to RWS.

RWS promotes dignity and respect for all, and an environment where individual differences and the contributions of all employees are recognised and valued. RWS is committed to prohibiting workplace

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discrimination. RWS will not unlawfully discriminate against any individuals including those with protected characteristics such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation in line with the Equality Act 2010 (“Act”), the International Labour Organization’s (ILO) conventions, such as [Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#) or [Equal Remuneration Convention, 1951 \(No. 100\)](#) or any other legislative requirements applicable to the jurisdictions in which RWS operates.

## Why this policy exists

The Equality Act 2010 sets out the legislation around equality, including what is required of employers in the United Kingdom (UK). As RWS has its head office in the UK and is publicly listed on the Alternative Investment Market (AIM), the London Stock Exchange regulated market, all RWS Group policies are UK law compliant. If a jurisdiction outside of the UK provides for a higher threshold of legislative requirements, then those legal requirements will govern locally.

The overall aim of this Policy is to:

- ensure that RWS operates in line with this legislation and employees, contractors, prospective employees or any third party with whom RWS transacts, are not unfairly or unlawfully discriminated against in their dealings with RWS;
- ensure that we treat all individuals fairly, with dignity and respect;
- promote equity of opportunity;
- provide a safe, supportive, and welcoming environment – for all employees, contractors, volunteers, and visitors; and
- integrate our values into our work.

Further, it details the approach RWS takes to provide guidance to all employees relating to equity and diversity and the steps that RWS wishes its employees to take to ensure compliance.

## 3 Scope

This Diversity, Equity and Inclusion Policy (“Policy”) applies to RWS Holdings plc, its affiliates, subsidiaries, divisions, and locations worldwide, and to every employee, prospective employee, contractor, volunteer, supplier or third party connected with RWS. It is a condition of employment that all employees respect and act in accordance with this Policy. Failure to do so will result in disciplinary procedures being initiated which could lead to dismissal.

## 4 Associated documents

The following policies and procedures may need to be consulted in conjunction with this Policy, as applicable:

- HR Disciplinary Policies and Procedures

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- Whistleblowing Policy
- Code of Conduct

## 5 Policy Statement

- 5.1 All eligible persons shall have equal opportunity for employment and advancement in RWS based on their ability, qualifications, and aptitude for the work. Everyone has a right to equity of opportunity where they are treated with dignity and respect.
- 5.2 To provide a high-quality service, RWS needs to attract, recruit, develop and retain the best people at all levels in accordance with these core fundamentals:
- 5.2.1 **Diversity** – RWS accepts each person as an individual. RWS’s success is built on its ability to embrace diversity – and the company believes that everyone should feel valued, respected, and accepted for their contributions.
- 5.2.2 **Equity** – RWS promotes equity of opportunity by seeking to remove barriers, eliminating discrimination, and ensuring equal opportunity and access for all groups of people. RWS will treat everyone it deals with equally, i.e., it will not treat anyone differently because of their age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality, and ethnic or national origin); religion or belief; sex (gender); sexual orientation and any other protected characteristic or class as required by applicable law.
- 5.2.3 **Inclusion** – RWS creates a working culture where differences are not only accepted but valued, and where everyone can develop in a way that is consistent with RWS’s values. RWS’s aim is to be a company where people feel involved, respected, listened to, and connected to the company’s success.
- 5.3 RWS is committed to a policy of promoting equity of opportunity, providing an inclusive workplace, and eliminating any unfair treatment or unlawful discrimination. This applies to all employment policies and practices including those relating to:
- Recruitment and employment, including promotion and career progression;
  - Development and training opportunities;
  - Working environment;
  - The provision of services;
  - Interaction with and use of suppliers;
  - Use of consultants, contractors or other third parties; and
  - Redundancy and re-deployment.
- 5.4 Instructions from third parties to act in a way which would fall outside of these parameters will not be accepted.

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## 6 Underpinning principles

- 6.1 Equal treatment involves much more than simply treating everyone alike; it requires recognition that some groups and individuals have particular and specific requirements that need to be met if they are to enjoy equal access to the opportunities available at RWS. As such, RWS will ensure that in conducting its activities RWS will:
- 6.1.1 promote equity of opportunity across all the activities of RWS;
  - 6.1.2 promote good relations between people regardless of their background; and
  - 6.1.3 eliminate unlawful or unethical discrimination.
- 6.2 The Policy is guided by the following principles:
- 6.2.1 All employees and third parties should enjoy a safe, supportive, and welcoming environment free from discrimination.
  - 6.2.2 All employees should have equal access to opportunities for personal and professional development, career progression and promotion.
  - 6.2.3 The use of positive initiatives to redress inequalities and discriminatory practices.

## 7 Responsibilities

The Divisional Presidents, Functional Heads, and Heads of HR are responsible for ensuring RWS and this Policy meets all applicable legislative requirements.

- 7.1 The Divisional Presidents and Functional Heads report to the Chief Executive Officer (CEO) and have lead responsibility for ensuring the strategic development, implementation, review, and promotion of the Policy. The Heads of HR, in conjunction with the Divisional Presidents and Functional Heads, will be responsible for providing any updates and evaluation of feedback.
- 7.2 The Heads of HR, in conjunction with the Divisional Presidents and Functional Heads, are responsible for ensuring that procedures relating to employee recruitment, selection, career development, and discipline and grievance are conducted in accordance with the Policy of non-discrimination.
- 7.3 Directors and all employees with managerial or supervisory responsibility, have responsibility for implementing, monitoring, and promoting this Policy within the workplace. Such directors and managers are required to exercise leadership in their role by encouraging inclusion, discouraging prejudice, and modelling appropriate behavior, promoting a culture in which compliance with this Policy is regarded as integral to the work of RWS, and ensuring all employees are encouraged and supported and enabling them to reach their full potential.

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7.4 Employees have personal responsibility for complying with this Policy in all areas of their work, individually and collectively, and for behaving in a way which supports and upholds the principles of diversity, equity, inclusion, and demonstration of mutual respect.

All employees must make sure they do not:

- Discriminate against anyone
- Persuade or pressure other employees to discriminate
- Harass, bully, or abuse other employees or the public or any reason
- Condone harassment

## 8 Zero tolerance

8.1 It is unlawful to discriminate against individuals, in respect of a protected characteristic. Treating anyone differently because they have one or more of the protected characteristics is illegal. RWS has a zero-tolerance approach to any form of discrimination on the grounds of any of the protected characteristics, whether or not the Act applies the specific form of discrimination to a specific characteristic. This section sets out which types of discrimination apply to which protected characteristics.

8.2 The following types of discrimination are prohibited under the Act:

8.2.1 **Direct discrimination** – where a person is less favourably treated because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation.

8.2.2 **Discrimination by association** – direct discrimination against an individual because they associate with another person who possesses a protected characteristic.

8.2.3 **Discrimination by perception** – treating someone less favourably than others because those others think that person has a protected characteristic – it applies even if the person does not in fact have the perceived protected characteristic.

8.2.4 **Indirect discrimination** – where a requirement or condition which cannot be justified is applied equally to all groups but has a disproportionate adverse effect on one particular group.

Example:

- The restriction of recruitment to areas where there are few ethnic minorities; or
- A requirement which is non-essential to the job description which may exclude a disabled person (such as the requirement for a driving license for a job which is mainly office based).

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- 8.2.5 **Victimization** – where someone is treated less favourably because they have made or supported a legitimate complaint or raised a legitimate grievance against RWS under the Act.
- 8.2.6 **Harassment** – where unwanted conduct related to any of the grounds referred to above takes place with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve physical acts or verbal and non-verbal acts, communication, and gestures.
- 8.2.7 **Less favourable treatment** as used in relation to disability discrimination when a person with a disability is treated in a detrimental way in circumstances when a person without that disability would not be so treated.
- 8.2.8 Failure to consider making reasonable adjustments in relation to disability discrimination.

## 9 Application

- 9.1 Under this Policy RWS will implement and apply the following requirements:
  - 9.1.1 Recruit, train, develop and promote staff based on merit and ability alone.
  - 9.1.2 Work towards a workplace that is free from discrimination, bullying and harassment, and will act promptly on any complaints of discrimination, bullying or harassment.
  - 9.1.3 Provide a safe working environment.
  - 9.1.4 Make the workplace, and information about work, as accessible as the company can for all employees.
  - 9.1.5 Work according to the relevant employment jurisdiction and statutory codes of practice.
  - 9.1.6 Continue to develop good practice employment policies and procedures as required by legislation.
  - 9.1.7 Apply this Policy though the organization’s recruitment and selection process, training programs, grievance procedure and all other employment policies.
  - 9.1.8 Give employees and job applicants access to complaint procedures if they feel unfairly treated.
- 9.2 Employees should draw to the attention of their immediate manager, their superior or to HR any suspected discriminatory acts or practices.
- 9.3 Employees can complain of behaviour that they find offensive even if it is not directed at them.

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## 10 Breach of policy

RWS will take seriously any instances of non-compliance to this Policy by employees, prospective employees, contractors or third parties. Any instances of non-compliance will be investigated in accordance with HR Disciplinary Policies and Procedures. In the event of any breach of the Policy by third parties, RWS will take appropriate action in relation to the nature of the incident.

## 11 Complaints procedure

- 11.1.1 Any employee of RWS who believes they have been discriminated against or has not been treated in accordance with this Policy is entitled to make a complaint to their manager or HR. All complaints will be dealt with seriously, promptly, and confidentially.
- 11.1.2 All complaints are to be recorded and the details reported accurately in accordance with this Policy, and the outcome of any procedure must remedy the situation.
- 11.1.3 Any employee found to be in breach of this Policy, either deliberately or inadvertently, may be subject to disciplinary action in accordance with the HR Disciplinary Policies and Procedures.
- 11.1.4 RWS aims to protect anyone who makes a complaint, or who acts as a witness, under these procedures.

## 12 Employment practices

### 12.1 Job advertisements

All job advertisements, wherever and however placed, on behalf of RWS will include the following statement:

“RWS embraces diversity and promotes equal opportunity, we are an Equal Opportunity Employer and prohibit discrimination and harassment of any kind. RWS is committed to equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment. All employment decisions at RWS are based on business needs, job requirements and individual qualifications, without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation. RWS will not tolerate discrimination based on any of these characteristics.”

### 12.2 Recruitment

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- 12.2.1 RWS will take steps to ensure that applications are attracted regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation or any other protected characteristic or class as required by applicable law -in all stages of the recruitment process. Any publicity relating to RWS, and employment will refer to the Policy.
- 12.2.2 All job applications will be processed in the same way – recruitment is conducted on the sole basis of the applicant’s abilities and suitability for the position.
- 12.2.3 The employees responsible for shortlisting, interviewing, and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.
- 12.2.4 All questions that are put to the applicants will relate solely to the requirements of the job.
- 12.2.5 If it is necessary to assess whether personal circumstances will affect the performance of the job, this will be discussed objectively, without detailed questions based on assumptions about the applicant’s age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation or any other protected characteristic or class as required by applicable law.
- 12.2.6 All persons responsible for selecting new employees, employees for training or for transfer to other jobs, will be instructed not to discriminate on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation or any other protected characteristic or class as required by applicable law.

### 12.3 Selection of third-party services

- 12.3.1 RWS will not unlawfully discriminate in choosing third-party services and will take steps to ensure that equal opportunities are afforded to all third-party service providers. RWS will only seek to work with third-party service providers who share RWS’s commitment to diversity, equity, and inclusion.
- 12.3.2 Employees will use their own professional skill and judgement, based on their previous experience and that of colleagues, in the selection of an appropriate third-party service provider. Decisions will be based on expertise, experience, recommendation, and suitability for the work in question.

### 12.4 Working environment

Where employees have needs (e.g., cultural, religious, disability, or gender based) which may require adjustments to existing workplace practice, consideration will be given to whether it is reasonably practicable to vary or adapt work requirements and/or practice to enable such needs to be met. RWS aims to have a working environment and culture where everyone feels comfortable and treated with dignity and respect.

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**12.5** Promotion, training, and development

Selection for promotion will only be based on ability or demonstrated potential to do the job. All employees will be encouraged to take advantage of available, relevant, and suitable training and development opportunities.

**12.6** Procurement: contractors, agents, and partners

RWS is committed to providing equity of opportunity for contractors, consultants, and agents, and will apply fair, open, and consistent criteria in the selection of contractors and consultants. RWS will only seek to work with partners who share our commitment to equity, diversity, and inclusion.

**12.7** Harassment

Harassment is unsolicited and unwelcome workplace behavior that affects the recipient adversely. Where such behavior is motivated by age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender), sexual orientation it amounts to a violation of this Policy. RWS is committed to ensure that no harassment or victimisation at work is tolerated or condoned. Such behavior can range from extreme forms of bullying or violence to less obvious actions like practical jokes and ridiculing colleagues or subordinates. Any form of harassment is a potential disciplinary matter and will be dealt with under the company’s HR Disciplinary Process and Procedures.

## **13 Monitoring and review**

**13.1** This Policy will be monitored by the Divisional Heads of HR to review its effectiveness. The Divisional Heads of HR, in conjunction with the Divisional Presidents and Functional Heads, will monitor performance against targets. Amendments to the Policy will be made, where appropriate, considering experiences or changes in guidance and/or legislation.

**13.2** Monitoring will include ongoing checks and analysis in the following areas:

- Recruitment and promotion;
- Pay and remuneration;
- Training;
- Appraisals;
- Grievances;
- Disciplinary action;
- Dismissals and other reasons for leaving; and
- Any client, third party service providers, contractors, customer, vendor, partner and/or other third-party complaints.

**13.3** Action will be taken if monitoring reveals:

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- Breaches of this Policy; or
- Barriers to equal opportunities.

## 14 Policy review

- 14.1 This Policy is available on the Group's intranet. If there are amendments to the applicable legislation or regulatory requirements, the Policy will be amended to reflect these. There will be an annual review by the person responsible for the Policy to ensure the document is fit for purpose and remains effective. Any changes will be communicated by email by way of the "Regulatory and compliance update," team briefings or training, depending on the complexity of the amendment.

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