

ODGroup.

9th Floor, 55 Old Broad Street, London, EC2M 1RX

Diversity, Equity and Inclusion Policy

Aims of the Policy

The Company is committed to being diverse and inclusive employer and strives to ensure equality of opportunity and fair treatment at all times. This policy covers anyone who works for us in any capacity.

The Company has developed and maintains this policy with a view to building an organisation where you feel valued and able to achieve your maximum potential, and where attitudes and behaviours which do not embrace equality of opportunity are actively discouraged and prohibited.

The aim of the policy is to ensure:

- Everyone works in an open, inclusive environment that is free from unlawful discrimination, including harassment and victimisation;
- Everyone is treated equally and fairly within each aspect and at each stage of the employment relationship, and have an unhindered opportunity to achieve their full potential;
- The message which it seeks to promote is widely communicated throughout the workforce and no-one will be in doubt as to what the Company values are and what constitutes unacceptable behaviour within the organisation;
- Everyone will have a clear understanding of their rights and responsibilities under the policy;
- In order to ensure that the Company has access to the widest pool of talent and secures the best workers for its needs, opportunities for employment will be open to all suitably qualified candidates;
- The Company will monitor and review the effectiveness of this policy and our workplace practices with a view to identifying problems and taking the necessary steps to eradicate unlawful discrimination or lack of diversity where it is discovered;
- The Company has in place a clear, efficient and effective means of addressing concerns regarding DE&I matters; and
- Employees who make a complaint pursuant to this policy in good faith will not be victimised or treated less favourably as a result.

This policy applies equally to the treatment of our visitors, clients, customers, suppliers and other business contacts.

Our Goals for DE&I

Our people - we aim to increase diversity within ODGroup by engaging and attracting new people to the business and industry from underrepresented groups.

Our workplace culture - we aim to retain a diverse team within ODGroup and increase diversity within the leadership team

Our community - we aim to actively promote and support diversity and inclusion in the wider construction industry

Practices

This policy applies to all stages of the employment relationship, from recruitment through to the termination of employment, and in some circumstances beyond termination. It also covers all aspects of the Company's relationship with you. This includes the running of job advertisements; decisions regarding recruitment selection and access to employment; the provision of benefits, facilities and training and development opportunities; equal and fair treatment in relation to promotions, transfers, pay structures, terms and conditions of service, health and safety, grievance and disciplinary matters, reasons for termination and the provision of references.

Policy Statement

The Company will not unlawfully discriminate on the grounds of age, disability, ethnic or national origin, sex, gender reassignment, marital or civil partnership status, nationality, pregnancy or maternity, race,

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colour, religion or belief, or sexual orientation (collectively, "Protected Characteristics") or otherwise on grounds of part-time or fixed-term status.

Harassment in any form is not tolerated under any circumstances by the Company. No one shall be victimised for taking proper and legitimate action against discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, anyone.

It is the Company's policy to ensure that each job applicant will enjoy fair and equal treatment. Access to employment at the recruitment stage will be open to all and all internal promotion and transfer decisions will be made on fair and objective criteria, free from discrimination.

The Company will take all reasonably practicable steps to ensure that everyone is fully aware of their individual rights and responsibilities under this policy and the Company will endeavour to ensure you are aware of DE&I matters and your responsibilities under this policy.

Any individual team member's training needs will be identified through regular appraisals. Where it is discovered that an individual would benefit from training on DE&I matters, this will be provided.

Discrimination

With a view to promoting a greater understanding of this policy, the following is a general description of some of the different types of discriminatory acts that may be unlawful. Some of the actions referred to below can be intentional and others unintentional:

Direct Discrimination occurs where a person is treated less favourably because of a Protected Characteristic.

Indirect Discrimination occurs where a seemingly neutral provision, criteria or practice applied by the employer has the effect of disadvantaging people with a certain Protected Characteristic more than others, and the employer cannot justify it.

Harassment will occur where an employee is subjected to unwanted conduct which has the purpose or effect of violating that person's dignity, or creating an intimidating, hostile, degrading, humiliating or otherwise offensive environment, in relation to a Protected Characteristic.

Victimisation is where an individual has been treated less favourably because he or she had carried out a "protected act" - for example making or intending to make a legitimate complaint regarding discrimination within the workplace or acting as a witness to another person's complaint in respect of the same.

Other acts - some elements of the equal opportunities legislation also make further acts illegal, such as applying pressure or instructing another person to discriminate, or knowingly aiding an act of discrimination committed by another.

Lawful practices - you should be aware that, whilst it is the Company's aim to always act within the boundaries of the equal opportunities legislation, the law provides exceptions for certain practices and acts that may, at first glance, appear to be contrary to the aims of this policy, but which, for example, may be justified. If you have any concerns in respect of any workplace behaviour that you suspect may be contrary to this policy, please contact the Head of People and Workplace.

Recruitment, Selection and Promotion

ODGroup has made a commitment to diversifying our talent pool through actively pursuing candidates via non-traditional recruitment channels. We use a combination of online headhunting, social media campaigns, job boards, university careers portals, and local college link-ups, to actively engage with candidates with a variety of backgrounds and experiences.

We collect and analyse data on the make-up of our business to enable us to conduct yearly DE&I audits. As part of these audits we review our diversity statistics, demographics and trends in job applicants, internal promotions, and employee retention data, and use this information to continually shape our strategy, policies, processes, recruitment methods and workplace culture.

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Duties and Responsibilities

The Board has overall responsibility for the effective implementation and operation of this DE&I policy.

The Board has delegated day-to-day responsibility for the operation, maintenance and upkeep of this policy to the Head of People and Workplace and the DE&I focus group.

It is widely acknowledged that those working at team leader and senior management level can have a significant impact on the effective implementation of this policy and as such, will be expected to lead by example. Accordingly, the Company particularly requires all team leaders to act in accordance with this policy at all times, and to ensure that appropriate standards of behaviour are maintained amongst the workers that they manage.

The widespread success of the Company's DE&I policy can only be achieved with everyone's cooperation and accordingly, you have a personal responsibility for the practical application of this policy. You should seek to create an atmosphere of equality within the workplace, which includes treating all fellow workers, visitors, clients, customers, suppliers and other business contacts of the Company with dignity and respect and avoiding any behaviour that could be discriminatory.

You have a duty to immediately report any actual or potential breaches of this policy to your Line Manager so that remedial action can be quickly taken by the Company.

Breaches of this policy and enforcement

If you believe you have not been accorded equal treatment, you should raise the matter immediately with your Line Manager in the first instance. Where appropriate, or if it is not possible to raise the matter with your Line Manager, you may consider use of the Company's grievance procedure.

Any complaints or allegations regarding potential breaches of this policy will be treated very seriously and in confidence.

If you feel that you are the victim of harassment, you should be aware that the Company has a specific procedure for dealing with such complaints. In these circumstances, please refer to the Company's bullying and harassment policy.

If you discriminate against or harass anyone on any of the prohibited grounds in breach of this policy, you will be subject to disciplinary action. Such behaviour may constitute gross misconduct and may result in your summary dismissal. The Company will always take a strict approach to breaches of this policy.

Employees with Disabilities

If you are disabled (including neurological disabilities such as autism, ADHD, dyslexia, etc) or become disabled during your employment or engagement with us, you should inform us of your condition as you may wish to discuss adjustments to your working conditions or the duties of your job which you consider are necessary, or which would assist you in the performance of your duties. The Head of People and Workplace may wish to consult with you and with your medical advisor(s) about possible adjustments and where desirable, the Company may request that you attend an examination with a medical professional nominated by the Company, and at the Company's expense, in order to fully assess your condition.

Careful consideration will be given to any proposals that are put forward in terms of making adjustments and they will be accommodated where reasonable. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments. In these circumstances, we will explain why.

Implementation of this policy

ODGroup is committed to developing awareness and education around DE&I within our workplace. DE&I training is made available to all team members across the board and at every level. All new employees are required to take part in a DE&I induction which includes unconscious bias, mental health awareness and general equality and diversity training.

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Throughout the year we run lunch and learns, which give us the opportunity to promote awareness and offer continued learning for our team. Topics for our lunch and learns range from putting a spotlight on national and international campaigns to more personal topics that are close to our colleagues' hearts.

Where it is deemed appropriate, additional training may be considered on matters of DE&I. The Company will audit and review its policies, practices, procedures and related provisions and criteria on an annual basis to ensure that they operate fairly and objectively, and do not unlawfully discriminate.

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OD Projects (Holdings) Limited is a company registered in England and Wales.
Company Number 08171332.