INCLUSION & DIVERSITY POLICY

APPROVALS

REVIEWER

Name/Position	Jackie Wall / Sustainability Manager
Signature	*JM Wall* JM Wall (May 15, 2025 07:30 GMT+1)
Date	15-May-2025

APPROVER

Name/Position	Alison Wall / Chief Executive Officer
Signature	*Alison Wall* Alison Wall (May 15, 2025 09:41 GMT+1)
Date	15-May-2025

REVISION HISTORY

AUTHOR	REVISED SECTION/PARAGRAPH	Version	Effective Date	Review Date
Philip Rowe	Initial Version	1.0	06 June 2025	06 June 2026

Draft and Archived/Obsolete revisions are not to be used.
Access the Quality Management Library to verify revision.

Table of Contents

1. PURPOSE

At Plus-Project we believe that our strength comes from our people (employees) and the inclusivity of our environment. As an employee-owned business, we are committed to creating a workplace where every individual has a sense of belonging and feels valued, respected, and able to contribute their unique perspectives. We actively seek to foster an environment that embraces our employee's diversity and individual differences, and the contributions of all employees are recognised and valued.

We believe that our unique (to our sector) employee-ownership model via an Employee Ownership Trust (EOT) is the central tenet towards these goals as every employee has a financial and emotional stake in the business from the day they join at no personal cost.

By working together, we commit to creating a workplace where diversity is celebrated, and everyone has an opportunity to be included and to thrive. Our core values include excellence in all that we do and pursuing continuous improvement, and we strive to refine our practices for the benefit of both our employees and the communities we serve.

2. SCOPE

This policy applies to Plus-Project employees. The policy will be shared publicly.

Supplier diversity is covered separately in a Supplier Diversity Program.

3. DEFINITIONS

At the heart of Inclusion and Diversity in the UK is the UK Equality Act 2010 which has helped decide the scope of our responsibilities and provides the legal framework for our business whilst ensuring adherence to GDPR legislation.

These include the following protected characteristics:

1. Age
2. Disability
3. Gender Reassignment
4. Marriage and Civil Partnership
5. Pregnancy & Maternity
6. Race (including colour, nationality, and ethnic of national origin)
7. Religion or belief
8. Sex
9. Sexual Orientation

There are some key terms and definitions used when referring to Inclusion & Diversity:

- Inclusion - an inclusive workplace is one where everyone feels valued at work and has a voice. The company provides opportunities for all. Inclusive policies include flexible working (hybrid, remote and a variety of working schedules that meet employee needs as well as those of our business), a supportive environment, parental leave, neonatal

care leave, equal opportunities for growth, plus open discussions and celebrating differences.

- <u>Diversity</u> - valuing people with differences relating to age, class, ethnicity, gender, health, physical and mental ability, race, sexual orientation, religion, physical size, education level, job and function, personality traits, and other human differences.

- <u>Equality</u> – a workplace where every employee has an equal opportunity to make the most of their talents where no one has less opportunities or access because of where, what or to whom they were born, or because of other characteristics. However, equality does not consider that not everyone starts from the same place. People must not be treated unfairly because of "protected characteristics".

- <u>Equity</u> - everyone is given equal access to opportunities and fair treatment regardless of their background or identity. Everyone has access to the resources (through reasonable adjustments) that they need to do their job.

- <u>Belonging</u> – an employee's sense of feeling accepted, welcome and safe and that their uniqueness is recognised and valued by their company and colleagues.

- <u>Privilege</u> - An unearned, sustained advantage that comes from race, gender, sexuality, ability, socioeconomic status, age, and other differences.

- <u>Unconscious bias</u> – Attitudes and stereotypes that influence judgment, decision-making, and behaviour in ways that are outside of conscious awareness and/or control.

4. RESPONSIBILITIES

- <u>Chief Executive Officer</u> – Executive sponsor of Plus-Project's I&D efforts
- <u>Chief Operating Officer</u> – ensures compliance with GDPR legislation in our I&D Policy and procedures
- <u>Human Resources</u> - keep abreast of any changes in legislation with the assistance of Plus-Project's legal advisors
- <u>Executive Team</u> – accountable for I&D initiatives and fully support I&D. Will take seriously any complaints of bullying, harassment and unlawful discrimination by employees, clients, suppliers and the public.
- <u>Plus-Project Employees</u> – Follow this policy, prevent bullying, harassment and unlawful discrimination and complete Plus-Project's I&D training. Understand that they, as well as Plus-Project, can be held liable for acts of bullying, harassment, and unlawful discrimination in the course of their employment; against fellow employees, clients, suppliers and the public.

5. INCLUSION & DIVERSITY

5.1 Principles

There are four underlying principles to how Plus-Project approaches Inclusion & Diversity (I&D):

1. To treat people with respect and dignity and create an inclusive working environment free of bullying, harassment and unlawful discrimination
2. To value the differences and diversity of people
3. To eliminate unfair and inappropriate barriers
4. To make judgements based on equity and merit

5.2 Employee-Ownership

Employee-owned businesses are often more inclusive due to several inherent features of their business model and structure which naturally promote values of equality, fairness and collective benefit.

Plus-Project truly believe that an Employee Ownership Trust (EOT; indirect shareholding) is the ideal vehicle to ensure everyone is fairly represented, included, and recognised within the workplace. Below is a list of specific examples of inclusivity directly related to Plus-Project's EOT structure:

- Trustees of the EOT represent the collective interests of the employees
  - Nominated employee directors form part of the EOT board, who obtain their director role through a democratic vote. Ensuring decisions reflect the collective interests of the employees
- Everyone has a financial and emotional stake in the business
- All employees share in the financial success of the company; profits are shared on an equitable basis via bonuses
- All employees have a voice via the Employee Directors
- Focus on long term sustainability and stability; shares are held by the Trust in perpetuity rather than individually by each employee, creating an open market and risking dilution of ownership
- Employees do not need to purchase shares individually ensuring no apparent favouritism towards those better off financially with the means to purchase shares

5.3 Privilege and Unconscious Bias

Plus-Project acknowledges that privilege exists and recognises that unconscious bias is present in us all. Both, bias and privilege can lead to barriers in Inclusion & Diversity. Biases are stories we make up about people before we get to know them, helping us in some situations and hindering us in others. Whilst bias is often thought to have negative connotations, biases are not good or bad. Halvorson and Rocks' SEEDS model is commonly used to explain how we respond to biases:

SIMILARITY	People tend to prefer what is similar to what they are used to
EXPEDIENCE	People like what confirms their thoughts and does not challenge them
EXPERIENCE	People prefer what they have known or have experienced positively in the past
DISTANCE	People like what is close them, physically and temporarily
SAFETY	People prefer what is safest for them or what has proven to be safe

5.4 Inclusive Culture

As detailed in Plus-Project's Code of Conduct, Plus-Project strives to promote an inclusive culture. Plus-Project will not discriminate based on age, disability, sex, or sexual orientation, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or beliefs.

Plus-Project opposes and avoids all forms of unlawful discrimination in its:

- Pay and benefits
- Terms and conditions of employment
- Grievance and disciplinary processes
- Dismissal
- Redundancy
- Leave for parents
- Requests for flexible working
- Selection for employment, promotion, training or other developmental opportunities

Our Employee Handbook includes specific sections on "Bullying and Harassment", "Sexual Harassment", "Equal Opportunities" and "Whistle Blowing".

5.5 Commitments

Plus-Project has made the following commitments to Inclusion and Diversity:
- To always treat employees, clients, and suppliers fairly, regardless of background
- Build relationships with universities; attend careers fairs to encourage people from all backgrounds to enter our industry
- To review our policies, procedures and culture to ensure that we are a work place that is inclusive and fair
- Engage local community initiatives and charities through donations and an annual volunteering day for all employees, addressing health inequalities and supporting underprivileged groups
- Build relationships with local schools. Identify schools where students may not see Biostatistics as a viable career. Engage with these schools and their students, and encourage them to consider study STEM subjects at college and university
- Evaluate apprenticeships for those that may not typically enter our industry, where appropriate to do so

5.6 Training

Plus-Project will provide mandatory training on I&D to all employees.

5.7 Measuring and Reporting

To monitor company progress in meeting this policy's purpose, I&D KPIs and metrics will be identified, reported and monitored in Plus-Project's quarterly and annual management reports. I&D related KPIs and metrics are located within Plus-Project's expanded KPI document (held externally from this policy; Plus-Project Key Performance Indicators). Additionally, a selection of these KPIs will be included in our Annual Impact Report, shared publicly on our website.

In the interests of transparency, KPIs and metrics will include at a minimum: -
- Number and percentage of females on the Plus-Project Board (target at least one)
- Number and percentage of females on the Plus-Project Trust Board (target at least one)
- Number and percentage of females in the Executive Team (target at least two/>=40%)
- Number and percentage of females in Leadership Team (target >=40%)
- Number and percentage of female employees (target >=45%)
- Gender pay analysis (target female to male pay +/- 5% across levels. e.g. ratio of mean pay of females: males within 0.95 to 1.0526)
  - Gender pay analysis across levels will be performed within region, where feasible to do so, but no targets due to the small sample sizes
- Age category of employees (<30, 30-50, >50)
- Completion rate of I&D training (target = 100%)
- Cases of harassment (target = 0)
- Cases of bullying (target = 0)
- Cases of discrimination (target = 0)

Note: As a Small-Medium Enterprise the small overall sample under consideration has been factored in our target setting. When the sample size is extremely small an absolute target is given.

5.8 Review

Plus-Project's practices, procedures, policies, guidance and processes will be periodically reviewed to ensure that they are inclusive and ensure fairness.

Human Resources and our legal advisors will be responsible for continuing to keep abreast of changes in legislation. The Plus-Project Board will remain accountable and will update policies where applicable to take account of changes in the law.

6. APPLICABLE REFERENCES

- UK Equality Act 2010
- GDPR Legislation
  - Regulation (EU) n°2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

- o Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (SI 2019/419) (UK-GDPR).
- Plus-Project Code of Conduct
- Plus-Project Employee Handbook
- Plus-Project Key Performance Indicators

7. APPENDICES

Not Applicable

8. ATTACHMENTS

Not Applicable