

Equality, Diversity and Inclusion Policy

At Steer, we seek to provide a workplace that is safe, professional and supportive of teamwork based upon shared trust and respect. Everyone who works for Steer contributes to its success and to creating a great company. By working together, drawing from the diverse talents and perspectives, Steer will stimulate new and creative opportunities for the business.

Steer is committed to ensuring that every employee has a working environment that promotes dignity and respect, where individual differences and the contributions of employees are recognised and valued. Steer will take every possible step to ensure that individuals are treated equally and fairly and that decisions on selection, recruitment, reward, career development and advancement are based solely on objective and role specific criteria, irrespective of any protected characteristics or classification as applicable by local legislation.

Scope

Steer is committed to eliminating discrimination and encouraging equality, diversity and inclusion amongst its workforce and supply chain. Steer fully supports the principle of equal opportunities in employment and opposes all forms of unlawful or unfair discrimination on any grounds. As such, Steer will follow all applicable labour and employment laws in all jurisdiction in which it operates.

Discriminatory behaviour on any grounds or any breach of this policy will not be tolerated and may result in disciplinary action up to and including dismissal in accordance with Steer's Disciplinary Policy.

Key Definitions

- Equality: Providing equality of opportunity by treating everyone fairly and equally, regardless of differences;
- Diversity: Recognising and embracing the differences between people whilst valuing the contribution everyone can make to Steer;
- Inclusion: Valuing the benefits of have different perspectives and creating a safe, welcoming workplace that encourages employees to be innovative and develop new ways of thinking.

Responsibilities

The People Team is responsible for ensuring that this policy is implemented and monitored. In addition, the People Team will also ensure that all People policies, procedures and employment practices do not discriminate in any way and are consistent with this policy.

Steer will communicate this policy effectively to all employees. Steer will ensure that all employees, managers and personal supervisors are aware of their responsibilities and will provide training on this policy.

All employees have a personal responsibility to act in accordance with this policy, treating colleagues with dignity and respect at all times and not displaying any behaviours that discriminate against **or harass other employees**. This also relates to work related occasions which take place outside of the normal place of work such as social events and external

courses/meetings. Similarly, this also applies to interactions with visitors, clients, members of the public and suppliers.

Directors, Heads/ Office Leaders, Project Director and Project Managers and Personal Supervisors have a responsibility to set the standards of acceptable behaviour, and so must act with fairness and equity. All Heads are responsible for implementing fair, non-discriminatory practices within their Team/Division/Business Unit. In addition, Heads must ensure that all those making recruitment and selection decisions are aware of and have received training as per the requirements of this policy.

Implementing EDI Processes

Steer will apply equal opportunity requirements throughout all of its employment practices, and will ensure equal opportunities through the following measures (non-exhaustive):

Recruitment and Promotion

The Equality, Diversity and Inclusion Policy applies to the advertisement of jobs, interviewing and the selection process. Steer's recruitment and selection process ensures that no person receives less favourable treatment, whether directly or indirectly, on grounds of any protected characteristics or classification as applicable by local legislation that has no bearing on their ability to perform a job.

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for differently-abled candidates.

Recruitment and employment decisions will be made on the basis of fair and objective criteria and in accordance with Steer's Recruitment and Selection Policy. A minimum of two interviewers will be present throughout each stage of the interview process. Where possible the interviewing panel should be gender balanced. All Steer employees who participate in recruitment and selection activities will receive training.

Learning and Development

Steer will reflect the commitment to equal opportunities through equality of access to training and career development opportunities.

Learning and development programmes will be designed to support the aims of this policy. Care will be taken to ensure that all training materials do not stereotype, prejudice or discriminate in any way. Every effort will be made to select external courses which also meet these requirements.

Learning opportunities will be based on an employee's ability, business needs and the availability of appropriate work-related courses. Wherever practical, training will be arranged so that all employees may attend, such as taking into account difference working patterns.

All new employees will receive induction training. As part of the induction process, employees will be made aware of this policy and what it means to them. Existing employees will receive refresher training on this policy and other training as appropriate.

All employees will be subject to an continuous development review process and this will involve a discussion to identify available and appropriate learning and development opportunities.

Work-Life Balance

Steer aims to encourage a healthy work-life balance for employees through a number of policies and procedures which are reflective of local jurisdiction requirements and cultures. This includes (non-exhaustive):

- Annual Leave Policy
- Flexible Working Policy
- Family Leave Policies
- Special Leave Policy
- Working From Home Policy
- Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

Differently abled employees

The requirements of employees who are differently-abled will be reviewed to ensure that where ever possible, reasonable adjustments are made. Steer will provide reasonable workplace accommodation to employees when it is determined that such accommodation is necessary and reasonable, in consultation with the employee.

The employee may also wish to advise of any adjustments to their employment or working conditions that they consider may be appropriate or which may assist them in the performance of their duties. Careful consideration will be given to any proposals of this nature, where appropriate and reasonably practical such adjustments will be made.

Promotion opportunities, benefits and facilities of employment will not be unreasonable limited, and every effort will be made to ensure that differently-abled employees participate fully in the workplace.

Adapting working Practices

Steer is committed to recognising cross cultural differences and to this end Steer will respect an individual's (employees' and job applicants') needs regarding the observance of their faith such as specific prayer times. Requests for annual leave to attend religious festivities will be respected and accommodated as far as is practical within the particular working environment.

An applicant or employee who believes they need a reasonable adjustment to accommodate a sincere religious belief or practice should discuss their needs with their Business Unit Head and/or the People Team.

Supply Chain

Steer is committed to embedding equality, diversity and inclusion throughout its supply chain. Steer requires that contractors and suppliers of services comply with this policy. All such organisations are required to make available the resources to comply with this policy, in the delivery of services they are providing. Failure to comply with the requirements of this policy may result in them being removed from our supply chain.

EDI with our clients and other third parties

We will treat our clients fairly and with respect for EDI matter at all times. In the unlikely event that a client makes a request which is potentially inconsistent with this Policy, the matter should be raised to the appropriate Business Unit Head/ Office Lead/ Regional or Managing Director or the Head of People.

Equality, Diversity and Inclusion Committee

Steer has an Equality, Diversity and Inclusion committee which debates and advises the Executive on issues and options around improving equality, diversity and inclusion across all parts of Steer. The committee seeks to promote cultural evolution and ensure that the EDI agenda is considered across all functions and geographies.

The Terms of Reference for the Committee are;

- To raise EDI issues and advise on actions and improvements to the Executive at regular intervals with support from the People team.
- To promote positive equality, diversity and inclusion transformation at Steer by evaluating policies and practices. To act as EDI champions by challenging status quo (when feasible) and recommending changes where merited.
- To identify and share good practice from across Steer and externally to inform others, both internally and externally.
- To monitor, champion and ensure delivery and implementation of actions and initiatives agreed, including those relating to L&D and recruitment. This may include advising on the prioritisation of initiatives to the Exec.
- To review and verify EDI reporting and associated metrics.
- To consult with our people, receiving and escalating issues and observations from key stakeholders to the committee for review and debate.

In addition, Steer has an EDI Champion who is a member of the Executive (Head of People).

Dignity at Work

Steer does not tolerate harassment of our job applicants, employees or contractors by another employee, personal supervisor/manager, vendor, customer, or any third party. Any form of harassment on the basis of any protected characteristics or classification as applicable by local legislation is prohibited and will be treated as a disciplinary matter. Steer is committed to a workplace free of harassment.

Harassment as defined in this policy is unwelcome verbal, visual or physical conduct, based on an individual's protected characteristic, creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Such conduct violates this policy, even if it is not unlawful. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a professional and respectful manner.

Sexual harassment can include all of the above actions, as well the below examples. Examples of conduct that are considered sexual harassment include (non-exhaustive):

- Unwelcome sexual advances, advances, leering, whistling, touching, pinching, assault, blocking normal movement
- Requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
- Obscene or vulgar gestures, posters, or comments
- Sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies
- Propositions, or suggestive or insulting comments of a sexual nature
- Derogatory cartoons, posters, and drawings
- Sexually-explicit e-mails or voicemails
- Uninvited touching of a sexual nature
- Unwelcome sexually-related comments
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual
- Teasing or other conduct directed toward a person because of the person's gender

All such conduct is unacceptable in the workplace and in any work-related settings such as business trips and business-related social functions, and in informally arranged social interactions between employees (even if outside the workplace) regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor, or other third party.

Discipline and Grievance

Any employee who feels that they have been treated less favourably than others in the same circumstances has the right to use Steer's Grievance Policy/ Internal Complaints Policy to seek redress. All complaints and grievances will be thoroughly investigated and dealt with fairly and consistently.

We cannot remedy claimed harassment, discrimination or retaliation unless an employee brings these claims to the attention of management. Failure to report claims of harassment and/or retaliation prevents us from taking steps to remedy the problem. Any employee who feels that they have been harassed or discriminated against should immediately raise the matter with the People Team and where appropriate, to their Regional or Managing Director.

Steer will promptly investigate the facts and circumstances of any claim of harassment, discrimination, or retaliation. To the extent possible, the Company will endeavour to keep the reporting employee's concerns confidential. Upon completion of the investigation, Steer will take corrective measures against any person who has engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate dismissal or termination.

We strongly encourage employees to report any claims using our internal procedures in the first instance. However, an employee is not prohibited from contacting (local) external agencies, please see appendix 1.

Employees who make allegations in good faith will not be victimised or otherwise disadvantaged as a result. False allegations of a breach of the Equality, Diversity and Inclusion Policy that are found to be made in bad faith will however be dealt with under the Company's Disciplinary Policy (as applicable to the local jurisdictions).

Steer will maintain confidential records of complaints covered by the scope of this Policy and any investigation undertaken.

Monitoring and review

We will monitor the effectiveness of this Policy to ensure it is achieving its objectives. This Policy will therefore be review and updated as and when necessary.

If there are any instances of doubt about the application of the policy, or any other questions surrounding it these should be addressed to the People Team.

Appendix 1

We strongly encourage employees to report any claims using our internal procedures in the first instance. However, an employee is not prohibited from contacting (local) external agencies, below is a non-exclusive list.

- Advisory, Conciliation and Arbitration Service (ACAS) UK, www.acas.org.uk
- California Department of Fair Employment and Housing: 2218 Kausen Drive, Suite 100 Elk Grove, CA 95758, 800-884-1684 (voice), 800-700-2320 (TTY);
- New York City Commission on Human Rights: 40 Rector Street - 9th Floor, New York, NY 10006, 212-306-7500 (voice)
- Massachusetts Commission Against Discrimination Boston Office: One Ashburton Place, Room 601, Boston, MA 02108-1518, (617) 994-6000 (voice), (617) 994-6196 (TTY).
Springfield Office: 436 Dwight Street, Room 220, Springfield, MA 01103, (413) 739-2145;
- Equal Employment Opportunity Commission, John F. Kennedy Federal Building, Government Center, 4th Floor, Room 475, Boston, MA 02203, (617) 565-3200 (voice), (617) 565-3204 (TTY). Complaints must be filed within 300 days of the adverse action.

This policy is for guidance only and does not form part of your contract of employment.

This policy will be reviewed periodically particularly in line with any statutory or legislative changes.

The Company reserves the right to amend it at any time.

CONTROL INFORMATION

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