

## Diversity, Equity and Inclusion Policy

### Diversity, Equity & Inclusion statement

Individuals with different cultures, perspectives and experiences are at the heart of the way MiCiM works. We aim to recruit, develop, and retain the most talented individuals, regardless of their background, and utilise their talents to the best of our ability. At MiCiM, we are guided by our values in everything we do and recognise that being a diverse and inclusive employer helps us fulfil our responsibility to make a difference to our clients. We seek to develop a work environment where we treat all employees as individuals, fairly and in a consistent way. We work within the spirit and the practice of the Equality Act 2010 by promoting a culture of respect and dignity. We will continue to support our leaders, managers, employees and staff members to demonstrate the principles of diversity and inclusion in their everyday activities, roles and functions.

### Purpose

This policy sets out MiCiM's approach to diversity, equity and inclusion. MiCiM is committed to promoting diversity, equity and inclusion, and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work. MiCiM aims to be an inclusive organisation, committed to providing equal opportunities throughout employment, including in the recruitment, promotion, training and development, transfers, performance management, remuneration, grievance and disciplinary procedures, selection for redundancy and dismissal, and to proactively tackle and eliminate any form of discrimination.

Our objective is that within MiCiM we provide a fair and equal working environment that is free from all forms of discrimination. The Company believes all employees and job applicants have the right to be protected from unfair treatment and we will only differentiate on merit and the ability to do the job.

It also applies to temporary staff, contractors and consultants and all third parties that the Company engages. Unless otherwise stated, all references to employees include potential employees, former employees, as well as agency workers, temporary workers and contractors.

### Diversity, Equity and Inclusion at MiCiM

At MiCiM, we consider that equity means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups both in employment and to goods and services. We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this, everyone can feel valued for their contributions, which is beneficial not only for the individual but for MiCiM too. We acknowledge that equity and diversity are not

interchangeable but interdependent. There can be no equity of opportunity if difference is not valued and harnessed.

As part of our Diversity, Equity and Inclusion policy, we want to make our workplaces across the business inclusive for neurodivergent workers. We understand that there are natural variations in the way that people think and process information, and that there are strengths that can be derived from thinking differently. Staff who think differently bring real value and different perspectives, and as a Company, we want to embrace this. We all contribute to the diversity of the workforce, as no two people are the same and therefore, we focus on proactively identifying and removing barriers to work and creating an inclusive environment for all.

Staff who have cognitive conditions, such as autism, ADHD, dyslexia and dyspraxia, will be supported fully with their work and an assessment can take place with the line manager and/or the HR department if the staff member wishes to determine any support or reasonable adjustments that may need to be made to create a working environment that the staff member can thrive within.

## **Scope**

The rights and obligations set out in this policy apply equally to all employees, whether part-time or full-time or on a fixed-term contract, and also to associated persons such as secondees, agency staff, self-employed contractors and others employed under a contract of service. You have personal responsibility for the application of this policy. As part of your induction, you are expected to read and familiarise yourself with this policy, ensure that this policy is properly observed and fully complied with and complete the declaration below.

This policy is also of relevance to directors, line managers and other employees concerned with recruitment, training and promotion procedures and employment decisions which affect others. Managers are responsible for implementing this equal opportunities policy and for applying the policy as part of their day-to-day management of MiCiM.

All employees and staff members have a responsibility not to discriminate against fellow employees and to report any such behaviour of which they become aware.

## **MiCiM's commitment**

Every employee is entitled to a working environment that promotes dignity, equity and respect for all. MiCiM will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, agency staff, contractor, job applicant or visitor because of the following protected characteristics:

- sex
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic origin, nationality and national origin).

- disability
- sexual orientation
- religion and or belief; and
- age

## **Human Rights**

We recognise that businesses have the responsibility to respect human rights, and that responsible businesses can contribute meaningfully to safeguarding human rights. At MiCiM, we believe that our company can only flourish where human rights are protected and respected. We are committed to respecting the human rights of everyone we encounter, both through our business and within the communities in which we operate. We are also conscious that this is important to all our stakeholders, including our employees, subcontractors, shareholders, clients, and the communities in which we operate.

In our efforts to respect and uphold internationally recognised human rights, we are guided by international norms and standards including the ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and amended in 2022. It is an expression of commitment by governments, employers' and workers' organisations to uphold basic human values - values that are vital to our social and economic lives.

MiCiM is committed to covering the following four of the ILO's five fundamental principles:

1. Elimination of all forms of forced or compulsory labour
2. Abolition of child labour
3. No discrimination
4. Safe and healthy working environment

We do this by prohibiting discrimination, forced, trafficked and child labour. We are also committed to safe and healthy working conditions, the dignity of the individual, employee engagement, including effective information and consultation procedures.

Our employees are not covered by collective bargaining agreements which is the fifth commitment, as the company does not have a recognised trade union. Working conditions and terms of employment are outlined within contracts of employment, employee handbook and company policies.

## **Forms of Discrimination**

The following are forms of discrimination that this policy aims to prevent:

- Direct discrimination – occurs where a person is treated less favourably because of their race, religion and belief, sex, marriage or civil partnership, pregnancy and maternity, disability, gender reassignment, age, or sexual orientation.

- Associative discrimination – occurs where a person is discriminated against because they associate with someone who has a protected characteristic.
- Perceptive discrimination – occurs where a person is discriminated against because they are perceived to have a protected characteristic, even if they do not have that characteristic.
- Indirect discrimination – occurs where a provision, criterion or practice is applied to all employees but is liable to disadvantage individuals who share a particular protected characteristic. Indirect discrimination is still unlawful (unless it can be justified) even when the provision, criterion or practice causing the disadvantage has been unintentionally applied.
- Victimisation – occurs where someone is treated in a disadvantaged way as a result of making a claim, making an allegation of discrimination or giving evidence or information in connection with another person's claim.
- Harassment – occurs where there is unwanted conduct relating to a relevant characteristic and the conduct has the purpose of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also covers associative and perceived characteristics.

Harassment can take many different forms and may involve inappropriate actions, behaviour, comments or physical contact or gestures that cause offence or is objectionable. Physical contact includes for example, touching, pinching, pushing, grabbing, shoving, punching and other forms of physical assault. Harassment may also include victimisation, bullying, lewd remarks, demand of a sexual nature or the placing of items of a potentially offensive nature within view of employees or distributing such material by mail, mobile phone, text message, telephone, fax, email, photograph, uploads onto websites or any other electronic means.

The Company will treat allegations of harassment seriously and take the necessary steps to deal with such allegations appropriately. This includes any allegations which may have arisen from third parties, for example, clients or suppliers.

- Disability Discrimination – MiCiM will ensure that employment policies and practices fully comply with current legislative provisions and will consider making appropriate reasonable adjustments to ensure that disabled applicants or employees are not disadvantaged or suffer discrimination arising from their disability.

Discrimination based on work pattern (part-time working, fixed-term contract or flexible working) that is unjustifiable will also not be tolerated.

Any employee found to be acting in a discriminatory manner, whether directed towards fellow employees, contract workers, suppliers, clients or any other person that employees come into contact with while at work or on Company business, will be dealt with under the Company's Disciplinary Procedure. This could lead to their dismissal from the Company.

Employees should also be aware that in certain circumstances, should they be found guilty of discrimination they may be personally and legally liable for their actions.

## **When does this policy apply?**

This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on MiCiM's reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to MiCiM). We set out below some specific areas in which the Company will seek to ensure equal opportunities in the workplace, including:

### **a) Recruitment and selection decisions**

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively, and the Company will make decisions regarding an applicant's suitability for a position on the basis of reasonable job-related criteria. Selection for employment at MiCiM will be based on aptitude and ability.

### **b) Training**

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in MiCiM to encourage the promotion of the principles of this policy.

### **c) Promotion**

All promotion decisions will be made based on merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure equity of opportunity at all levels.

### **d) During employment**

Terms and conditions of employment, including pay and benefits, will be offered to employees fairly and equally. All employment-related policies, procedures and practices such as career development, promotion and access to training are non-discriminatory.

## **Making a Complaint**

### *Raising a Complaint of Discrimination, Harassment or Victimisation*

If you feel that you have been the subject of discrimination, harassment, or victimisation, the Company will treat your concern seriously and sensitively. In such circumstances, you should adhere to the following procedure:

#### *Informal Resolution*

1. You should, in the first instance, address your concern to the person you believe is discriminating against, harassing or victimising you. Tell them, in writing or verbally, that you find their conduct unacceptable.
2. If you feel unable to approach the person directly (as outlined in point one above) or, having attempted to address the issue with the person concerned, there has been no change in their behaviour or conduct, you should contact your line manager. If you feel uncomfortable raising the matter with your line manager, then you should contact their line manager or the HR department.

If the matter cannot be dealt with informally to your satisfaction, you can raise a formal complaint following the procedure below:

#### *Formal Resolution*

1. You may make a formal complaint in writing to your line manager, or if you feel uncomfortable doing this, you should put it in writing to the HR department. Your complaint should set out the following details:

- The name of the person about whom you are complaining
- The nature of the conduct/inappropriate behaviour
- Date and time of when the incident/s occurred
- Name/s of any witnesses/es to the incident/s and
- Any action already taken by you to stop the inappropriate behaviour

2. A meeting will be arranged within seven days, wherever possible, of receiving the complaint to discuss your complaint and how it should be dealt with. You may be accompanied to the meeting by a MiCiM employee or trade union representative.

3. Any contact made with your line manager, or the HR department if applicable, will be treated in confidence in the first instance. Subject to you then giving your consent for the matter to be disclosed to relevant individuals, a full and thorough investigation will be carried out. If you do not want to be involved or do not consent to the matter being disclosed to relevant individuals, depending on the circumstances of the matter, the Company will still have an obligation to carry out an investigation and take appropriate action, but the extent to which this can be done may be restricted.

4. You will be advised of the outcome of the investigation.

5. If it is appropriate for the employee to be subject to disciplinary proceedings, you will be notified of this, although for reasons of confidentiality for the employee concerned, you will not be made aware of the outcome of the proceedings.

If the Company's Disciplinary Procedure is formally invoked against your alleged harasser, your complaints will be investigated with due consideration to your feelings and concerns. Provided you are acting in good faith and with good reason, the fact that you have made an allegation against another member of staff will not affect your position within the Company.

In certain circumstances, it may be necessary for either the employee making the allegation or the person being accused to stay at home on special paid leave whilst investigations are being conducted, or the appropriate procedure followed.

If you make a complaint of harassment, you will not be victimised for doing so. Should any victimisation take place, then the perpetrator will be dealt with under the Company's Disciplinary Procedure. However, if you maliciously or falsely claim victimisation or harassment, you will be subject to the Company's Disciplinary Procedure, which may result in your dismissal.

### **Raising a Complaint of Harassment by a Third Party**

If you feel that you are being harassed by someone external to the Company, for example, a client or supplier, you should bring this to your line manager's immediate attention.

The Company will deal with all such allegations seriously and take reasonable steps to prevent it from occurring again.

### **If you Observe Harassment**

The Company believes that every employee should take responsibility for ensuring that other employees are not subjected to harassment. If you are aware of the possibility that another employee may be a victim of harassment either by a fellow employee, suppliers, clients or contractors, then you should notify your line manager immediately. Your allegations will be treated sensitively and provided you have acted in good faith and with good reason, then your position with the Company will not be affected in any way.

Employees in supervisory positions have a responsibility for managing other employees and, in doing so, must exercise particular care in performing their role. They must ensure that this responsibility is not abused by actual or apparent harassment or discrimination of any employee under their control. Managers may not instruct a member of staff, or bring pressure to bear on them, to discriminate against, victimise or harass another individual. Nor may they suppress any complaint of discrimination or victimisation or harassment. The Company will regard any such conduct as gross misconduct.

---

A handwritten signature in black ink, appearing to read 'Alison Newell', positioned above a horizontal line.

**Alison Newell**

Chief Operations Executive

July 2025