



Equity, Diversity and Inclusion Policy

SBFM Limited, 3 Greengate, Cardale Park, Harrogate, North Yorkshire, HG3 1GY

📞 0800 772 0093 🌐 www.sbfm.co.uk

VAT number: 190967565 | Company registration number: 8517137
Registered in England & Wales

Equity, Diversity and Inclusion Policy

SBFM is committed to encouraging equity, diversity and inclusion among our workforce and wider stakeholders. It is the Company's policy to create an equitable, diverse and inclusive culture that will enable us to deliver our Vision, Mission and Values. An equitable, diverse and inclusive culture has significant positive benefits, for SBFM, for individuals and society. A workplace where everyone feels heard and respected is vital to embed a diverse and inclusive culture so that every individual at SBFM can reach their full potential and allow us to attract and retain the best people.

This policy:

- Is to provide equity, fairness and respect for all employees, whether temporary, part-time or full-time; contractors, consultants, suppliers and the general public.
- Ensures everyone will be treated equally and fairly without regard to age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, sexual orientation and socio-economic background.
- Should be considered when creating all procedures and policies. This includes, but is not limited to, pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, parental leave, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities

The Board commits to:

The Board is responsible for driving our equity, diversity and inclusion agenda by:

- creating a working environment where people have the opportunity to achieve their full potential

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- encouraging an inclusive culture where people are free to be themselves and to express their views
- demonstrating inclusive leadership and challenging unacceptable behaviours
- ensuring action is taken if unfairness or discrimination occurs
- supporting a fair career management approach that enables the selection and promotion of the best talent
- deploying the appropriate resources and expertise to support the EDI agenda
- being visible role models by taking the time to understand the barriers employees have, how they can be addressed, and acting upon it.
- increasing transparency on diversity in the workforce and routes to career progression
- taking ownership for equity, diversity and inclusion in SBFM and the wider industry and embedding the EDI Strategy within all business functions
- creating a working environment that supports the needs of a diverse workforce
- Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- Reviewing employment practices and procedures when necessary to ensure equitable and fair.

What the company expects from Line Managers

Line managers have an important role to play in creating a diverse and inclusive culture in the office and on site.

Their responsibilities include:

- anticipating and responding positively to different needs and circumstances of employees so they can participate and perform to the best of their abilities
- championing inclusive principles through our everyday business operations and practices
- taking an active role in learning and understanding about different demographic groups and the barriers they may face

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- calling out bad behaviour, embedding an inclusive culture throughout the business area responsible for. Ensuring your employees know what is “acceptable and unacceptable behaviour” and how to deal with it
- keeping up to date with equality legislation, and the SBFM EDI policy and strategy
- treating all discrimination complaints seriously, be aware of the processes for dealing with grievances and complaints
- undertaking and participating fully in any relevant training provided by the company

What the company expects of you

We recognise and appreciate that personalities, characters and management styles are all different but

you should be aware of your own behaviour and how it impacts others.

We expect you to:

- take personal responsibility for creating and maintaining a positive working environment where we treat each other with dignity and respect, and where discrimination, victimisation, bullying and harassment are not tolerated
- value diversity and the contribution everyone makes to the company
- comply with our inclusion expectations during all your interactions with others including at work-related social events and on social media sites
- ensure the equity, diversity and inclusion priorities are incorporated into our everyday business operations, policies, training and practices
- notify your line manager or People Department of any concerns you have regarding the conduct of other employees or third parties. If anonymity is required, consider reporting issues through the Whistleblowing procedures.
- undertake and participate fully in any relevant training provided by the Company

Supply Chain

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Our supply chain are an integral part of our culture, and as such we expect a collaborative approach with our partners to achieve an inclusive environment in all our business operations. Key activities include:

- We will work with our supply chain to ensure they are taking into account the needs of all sections of the community when providing services on our behalf
- We will help train and develop our supply chain in inclusive practices and procedures, for example unacceptable behaviours
- Our procurement process will ensure that our supply chain understand what is expected of them with regards equity, diversity and inclusion

Compliance

All employees should treat each other with dignity and respect at work. If you feel you have not been treated in accordance with this policy you may, in the first instance (if you wish and feel comfortable to do so), raise your concern with the person responsible for the behaviour and request that it should cease. If you prefer, speak with your line manager or the HR Department with a view to reconciling the matter informally. Alternatively, you can raise the matter formally through the Grievance Procedure. All complaints will be dealt with seriously, promptly and confidentially. If an employee is found to breach the EDI policy, they will be subject to disciplinary action which could result in dismissal. Employees should be aware that they can be held personally liable for any act of unlawful discrimination by them.

Equity, diversity and inclusion monitoring

SBFM will monitor the demographics of the workforce including information such as age, sex, ethnicity, sexual orientation, religion or belief, disability, pregnancy and maternity, marital status, gender identity and socio-economic background..

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Monitoring will also include assessing how the equity, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

As part of this process we will also monitor:

- the composition of job applicants and each stage of the recruitment process
- access to training, promotion and other opportunities and benefits
- the impact of SBFM's employment policies, including use of the disciplinary and grievance procedure
- resignations, dismissals and other terminations
- exit interviews
- gender and ethnicity pay gap reporting

Related policies:

This policy is supported by the following other policies and procedures:

- Grievance Procedure
- Disciplinary Procedure
- Capability Policy
- Whistleblowing
- Anti-bullying and harassment
- Formal flexible working
- Agile working
- Homeworking
- Family leave policies:
 - Maternity

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- Paternity
 - Shared Parental Leave
 - Parental Leave
 - Adoption & Surrogacy
 - Foster care
 - Child bereavement
 - Time off to care for dependants
-
- Recruitment and Selection
 - Learning and Development
 - Menopause Policy
 - Gender Affirmation Policy
 - Reasonable adjustments
 - Procurement
 - Retirement
 - Bereavement
 - Domestic Abuse

The equity, diversity and inclusion policy is fully supported by senior management and the executive leadership team.

Policy owner: Kelly Dolphin
Chief People & Culture Officer

Review date: 29/08/2025