



THE DEP GROUP LTD
[and Associated Companies]

STAFF HANDBOOK

EQUALITY, DIVERSITY AND INCLUSIVITY POLICY

13 November 2025

DEP is committed to supporting and promoting equality and diversity in all of its practices; and in so doing ensuring an inclusive culture.

DEP will, in carrying out all of its activities, have due regard to:

- The promotion of equality of opportunity;
- The promotion of good relations between different groups;
- The elimination of all indirect and direct discrimination.

DEP will not tolerate discrimination (including indirect discrimination), harassment (including sexual harassment), and victimisation of any kind. DEP are determined to build an inclusive culture. Management and staff responsibilities must be seen in this context.

The Practice is committed to providing equal opportunities in employment. It is this organisation's policy to treat job applicants and employees in the same way, regardless of their sex, sexual orientation, age, religion or belief, race, ethnic origin or disability. Further, the organisation will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective including under-representation of certain ethnic groups.

PROCEDURE

1. Equal Opportunities

The Practice is an equal opportunities employer. Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has **personal** responsibility for the implementation of the policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to a Director as should any requests for special training.

2. Diversity

The Practice values the diversity that people bring to the organisation. We acknowledge the unique contribution that all potential candidates and employees can bring in terms of their culture, ethnic race, gender, nationality, age, religion, disability, sexual orientation, education, experiences, opinions and beliefs.

3. Discrimination

- 3.1 The Practice will not discriminate on grounds of race, sex, marital status, ethnic origin, colour, nationality, sexual orientation, disability, age, religion or belief.
- 3.2 It is unlawful to discriminate against individuals either directly or indirectly in respect of their race, sex, marital status ethnic origin, colour, nationality, sexual orientation, age, or religious or other belief. The Equality Act 2010 is the relevant Act.
- 3.3 Codes of Practice relating to race and sex discrimination have been produced by the Equality and Human Rights Commission.



4. Unlawful discrimination

- 4.1 Indirect discrimination consists of applying in any circumstances covered by the Act a requirement or condition which, although applied equally to persons of all racial groups, is such that a considerably smaller proportion of a particular racial group can comply with it and it cannot be shown to be justifiable on other than racial grounds.
- 4.2 Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 4.3 Employees should note that discrimination by victimisation is also unlawful under the Act. For example, a person is victimised if he or she is given less favourable treatment than others in the same circumstances because it is suspected or known that he or she has brought proceedings under the Act, or given evidence or information relating to such proceedings, or alleged that discrimination has occurred.

5. Offences

- 5.1 The Practice will not tolerate any act that could be considered an offence under the Modern Slavery Act 2015 or any other relevant legislation. This policy applies both within our organisation and externally, and extends to remuneration and working conditions. Directors and Managers must make all necessary enquiries to ensure adherence to our Policy.

6. Application

- 6.1 The policy applies to the advertisement of jobs, recruitment and appointment to them, training, conditions or work, pay and to every other aspect of employment. The policy also applies equally to the treatment of our customers/clients. Staff involved in recruitment in particular should request training if they have any doubt about the application of this policy.
- 6.2 Employees should note that the imposition of a condition or requirement which has an adverse impact on someone, because his or her sex, race or marital status is more likely to be affected by it, will also be unlawful unless it can be justified on grounds of business need. (By way of example a height requirement of 5' 10" will eliminate some men, but proportionately more women, and so be unlawful.) In all such situations a Director should be consulted.
- 6.3 Any member of staff may use the grievance procedure to complain about discriminatory conduct. If the matter relates to sexual or racial harassment then the grievance may be raised directly with a Director. The Company is concerned to ensure that staff feel able to raise such grievances and no individual will be penalised for raising such a grievance unless it is untrue and made in bad faith.



7. Discipline

- 7.1 Any employee who harasses any other employee on the grounds of race, sex, age, religion or belief, sexual orientation or disability will be subject to the organisation's disciplinary procedure. In serious cases, such behaviour will be deemed to constitute gross misconduct and, as such, will result in summary dismissal in the absence of mitigating circumstances.

8. Monitoring

- 8.1 All employees and job applicants will be asked to complete a form denoting their sex, race, ethnic origin, age, religion or belief, sexual orientation and any disabilities. The Practice guarantees that this form will be used for the purpose of monitoring the effectiveness of its equal opportunities policy only.

9. Positive Action

- 9.1 The composition of the workforce and of job applicants will be monitored on a regular basis. Should inequalities become apparent, positive action will be taken to redress the imbalance, including such measures as:

- advertising jobs in ethnic or female interest publications, as appropriate
- introducing assertiveness training
- encouraging under-represented groups to apply for suitable training posts.

10. Commitment

- 10.1 To ensure that the equal opportunity policy is fully effective the Practice will:

- ensure that the policy is known to all employees and to all job applicants
- provide training and guidance for supervisory staff and other relevant decision makers and staff responsible for recruitment to ensure that they understand their position in law and understand Practice policy
- inform all employees not to treat casual or formal applicants from particular racial groups less favourably than others.

Signed:

Date: 13 November 2025

Robyn Davies
Managing Director

For and on behalf of
The DEP Group Ltd