

# Inclusion and Belonging Policy

## Introduction

At XPS, our vision is to create a dynamic workplace where differences are valued as strengths and everyone can thrive. This supports our Employee Value Proposition (EVP), 'For all of you', and our promise to help colleagues feel connected, thrive and shape their path at XPS.

As an employer, XPS Group is committed to eliminating unlawful and unfair discrimination and fulfilling our legal obligations. But our commitment stretches beyond this. We look to foster a culture of belonging, valuing employees' ideas and contributions in line with our EVP promise to colleagues. We provide equality, fairness, and respect to all clients and scheme members, engage with our diverse communities and collaborate with our diverse suppliers. This policy helps deliver that promise by setting clear expectations for inclusive behaviour and fair decision-making across recruitment, development, performance, reward and day-to-day working relationships.

## The aim of this policy

- To promote a diverse and inclusive culture with zero tolerance for unfair and unlawful discrimination within XPS Group, supporting our promise that everyone can feel connected, thrive and shape their path at XPS.
- To clearly communicate our Inclusion and Belonging commitments to everyone who works for or with XPS Group, and to ensure that everyone understands their roles and responsibilities and the supporting policies and processes should they wish to raise an issue or concern.

## Who does this policy cover?

Existing and prospective employees of XPS Group including those on fixed-term contracts, agency workers and self-employed contractors. XPS Group also values diversity among its wider stakeholders and seeks to build strong, sustainable relationships with communities, governments, clients and suppliers.

## Our commitment

- To provide an environment free from discrimination, harassment, bullying or victimisation of any kind.
- To treat all prospective and existing employees fairly and with respect.
- To foster innovation and further strengthen our market position and employee relations.
- To investigate and take appropriate action, such as disciplinary action, regarding any behaviour that disadvantages someone unfairly.
- To monitor XPS workforce composition and implement measures for it to reflect broader UK demographics.
- To ensure that decisions on recruitment, selection, training, promotion, career development, performance management, reward and redundancy are based solely on objective and job-related criteria e.g. experience, knowledge, and skills.
- To deliver our EVP consistently, so colleagues' day-to-day experience matches the promise we make, regardless of role, location, background or working pattern. To comply with our statutory responsibilities.

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## Roles and responsibilities

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### Employees are responsible for:

- Respecting and acting in accordance with the spirit of this policy.
- Reporting any unacceptable behaviour they experience or witness and, where appropriate, supporting colleagues who raise concerns. This includes bullying or harassment by clients, suppliers, visitors, or others. Concerns should be raised with their line manager. Please refer to the [Bullying and Harassment Prevention policy](#) for further support and guidance.
- Understanding that individuals can be held legally responsible for discriminatory behaviour.
- Co-operating with any measures introduced to develop equal opportunities, e.g. participating in survey completion and feedback circles.
- Refraining from any kind of discriminatory action or decisions, including any type of harassment or abuse.

### Line managers or equivalent are responsible for:

- Respecting and acting in accordance with the spirit of this policy.
- Acting as role models and setting an appropriate standard of behaviour.
- Leading by example and ensuring that they and those they manage or supervise behave in a way that supports and promotes XPS's Inclusion and Belonging commitments and helps to deliver the everyday experience described in our EVP.
- Ensuring that people related decisions are fair, objective and based on merit.
- Taking reasonable steps to ensure that neither they nor anyone they manage subjects colleagues, applicants or anyone else covered by this policy to discrimination, harassment, bullying or victimisation.
- Communicating to their team the importance of including everyone and the consequences of any unacceptable behaviour and challenging behaviour that falls short of our commitment to Inclusion and Belonging.
- Being aware of employees' behaviour and responding promptly to concerns and escalating them appropriately.
- Being sensitive to the concerns of their team members.

### HR is responsible for:

- Ensuring complaints are dealt with promptly and wherever possible, confidentially.
- Supporting line managers and employees with any issues relating to this policy.
- Acting as a confidential point of contact for line managers and employees.

## Relevant Legislation

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Under the Equality Act of 2010 we have an obligation to eliminate discrimination and other prohibited conduct, advance equality of opportunity, and foster good relations between different groups. This Act includes guidance on sexual harassment, Harassment and victimisation. It is supported by related legislation and guidance, including the Equality Act 2010 (Amendment) Regulations 2023 (in force from 1 January 2024), which made amendments to ensure certain discrimination protections continue to have effect in domestic law.

In Northern Ireland, the Fair Employment Regulations complement the Equality Act by specifically addressing discrimination on the grounds of religious belief. Together, these legislative frameworks form the cornerstone of anti-discrimination and equality law in the UK, promoting a fairer and more equitable society. XPS will apply the legislation relevant to the jurisdiction in which it operates.

In addition, from 26 October 2024 employers have a legal duty to take reasonable steps to prevent sexual harassment of workers under the Worker Protection (Amendment of Equality Act 2010) Act 2023 (the "preventative duty"). We keep our

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approach under review in light of legal developments and guidance, including the Supreme Court judgment *For Women Scotland Ltd v The Scottish Ministers* [2025] UKSC 16 (16 April 2025), and will update this policy and our supporting processes where required. At the same time, we reaffirm that every colleague deserves to feel seen, respected and valued in our workplace.

## What is Discrimination?

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It is unlawful to discriminate against someone because they possess one of the 'protected characteristics' named in the Equality Act 2010. These characteristics are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex and sexual orientation. Discrimination, harassment and victimisation on the basis of protected characteristics can take various forms.

### Types of discrimination:

- **Direct discrimination** occurs when a person is treated less favourably because of a protected characteristic. Direct discrimination can include discrimination because of association with an individual with a protected characteristic, and discrimination because of perception that an individual has a protected characteristic.
- **Indirect discrimination** can occur when a provision, criterion or practice is applied equally to all people, but adversely affects people with a particular characteristic, and where the requirement or condition cannot be justified.
- **Dual discrimination** can occur when a person is treated less favourably on the basis of having two or more protected characteristics.
- **Disability Discrimination** occurs when a person is treated less favourably on the grounds of their disability (direct discrimination) or when a provision, criterion or practice that applies to everyone particularly disadvantages those with disabilities (indirect discrimination). There is also a legal 'duty to make reasonable adjustments' so that disabled people can access jobs. Disabled people can experience discrimination if an employer or organisation doesn't make a reasonable adjustment.

For further guidance and support, please refer to the Workplace Adjustment policy on Nexus.

### Types of harassment:

Harassment is unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

- **Sexual harassment** is unwanted conduct, which is offensive to the recipient, causing them to feel threatened, humiliated, patronised or harassed as a result of their sex.
- **Racial harassment** is behaviour which causes the recipient to feel threatened, disadvantaged or the subject of abuse because of their colour, race, nationality or ethnic origins.
- **Third party harassment** occurs where an employee is harassed by a third party e.g. a client, supplier or visitor, and the harassment is related to a protected characteristic.

For further details on harassment, please refer to the Bullying and Harassment Prevention Policy.

## Victimisation:

- **Victimisation** relates to retaliation against an individual who has raised a complaint, or who has supported someone else's complaint of discrimination or harassment. It is unlawful to discourage or prevent people from complaining under the Acts.

## How this policy applies to Recruitment and Selection

Equal opportunities must be applied throughout the recruitment and selection process and guidance is available to managers through the Recruitment and Selection policy, Interview, Job Description and Shortlisting guides available from the Recruitment team. Our Inclusion, Equality and Diversity statement is available on the Company website in our [Modern Slavery Statement](#).

The following is a set of guidelines to assist line managers through this process:

- All Company vacancies are advertised internally in order that all employees have an opportunity to apply unless there is a sensitivity around the role.
- All advertisements should be organised in conjunction with the Recruitment team, not only to ensure the correct Company format is used, but to also ensure that the advertisement is not discriminatory.
- External agencies on the Preferred Supplier List (PSL) have been made aware that the Company is an equal opportunities employer. If there is a need for an agency outside the PSL to be used, you will need to discuss this with the Recruitment team before placing the vacancy, to ensure the appropriate diligence checks take place and information regarding our approach to equal opportunities is provided.
- All colleagues involved in recruitment and selection should have attended XPS recruitment training, including the necessary legal and procedural requirements covered in the form of workshops, videos or guides. The current interview training programme/ guide highlights the correct procedures to adopt to ensure consistency, fairness and equality of opportunity.
- Application forms and selection processes provided by the Recruitment team must be used. Selection criteria must be agreed at the outset of the recruitment process so that the information gathered is objective, relevant and justifiable for the role. The online shortlisting form must be completed to demonstrate that selection decisions are fair and based on role-related criteria.
- As a Disability Confident leader, we have committed to supporting all disabled applicants through an inclusive recruitment process and offering reasonable adjustments at each stage where required.
- As a signatory to the Race at Work Charter, we have committed to building a pipeline of diverse talent and improving the diversity of our candidate lists, particularly for senior roles.

## How this policy applies to Learning, Development and Performance Management

Learning, development and performance management are areas where it is essential to have good inclusive practices. The following are guidelines for line managers:

- Performance reviews should assess job performance against relevant criteria to avoid subjective assessment.
- Length of service should not be used as criteria for assessing promotion. Decisions should be based on ability and skill.
- All employees should have equal access to training and development opportunities and should be encouraged to take advantage of them where appropriate. For example, part-time employees should have the same opportunity to participate in training as their full-time counterparts.

## How this policy applies to the XPS Group Disciplinary and Grievance procedures

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All colleagues may use the grievance, bullying and harassment procedures to complain about any kind of discriminatory conduct. The Company is keen to ensure that staff feel able to raise such grievances and individuals will not be penalised for raising a grievance in this area. Disciplinary action will be taken against an employee who is found to have committed any act of discrimination, harassment or victimisation. If upheld, this may be treated as misconduct or gross misconduct under our disciplinary procedure, and may lead to disciplinary action up to and including dismissal.

## Monitor and measure

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XPS will monitor workforce composition and assess how this Inclusion and Belonging Policy and any supporting action plans operate in practice. Where the data identifies material gaps or issues, XPS will determine appropriate actions, assign ownership and review progress, while handling personal data in accordance with applicable data protection requirements.

## Data protection

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UK GDPR requires XPS to process personal data fairly, lawfully and in line with data protection principles. This applies to customers, applicants, employees and leavers.

Personal data must be handled in accordance with XPS's Data Protection Policy and Data Protection Manual, available on Nexus / Compliance / Data Protection. Details of the data XPS collects, shares and retains, and employee rights, are set out in the Employee Privacy Notice on Nexus / Human Resources. The Leaver Privacy Notice is available on XPS's external website.

XPS restricts access to personal data to authorised individuals. Any inappropriate access or disclosure of applicant, employee or leaver data is a data breach and must be reported immediately to [Compliance@xpsgroup.com](mailto:Compliance@xpsgroup.com) under XPS's breach reporting process. It may also be treated as a disciplinary matter.

## Reference material

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1. Equality Act 2010
2. Fair Employment (Monitoring) Regulations (Northern Ireland) 1999
3. Equality Act 2010 (Amendment) Regulations 2023 (in force 1 January 2024)
4. Worker Protection (Amendment of Equality Act 2010) Act 2023 (preventative duty in force 26 October 2024)
5. For Women Scotland Ltd v The Scottish Ministers [2025] UKSC 16 (16 April 2025)

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