

EQUITY, DIVERSITY & INCLUSION POLICY (“EDI”)

DEFINITIONS

EQUITY	Equality ensures everyone has equal access to opportunities, treatment of reward, status, rights irrespective of the diversity of employees. Equity takes into consideration a person’s unique circumstances, adjusting treatment accordingly so that the end result is equal. Equity is therefore a more impactful measure for positive action.
DIVERSITY	The difference in race, ethnicity, gender, religion, age, sexual orientation, and socio-economic status or background that makes each of us who we are and recognising and celebrating our individual differences and neurodiversity.
INCLUSION	The practice of enabling everyone to bring their full, authentic selves to work as a place people feel they truly belong, are valued, and are included. Respecting and supporting every individual’s personal contribution, allowing them to perform to their full potential and enable them to make meaningful contributions.

INTRODUCTION

We are a people business, and our success is driven by the effective mobilisation and support of talented people across our organisation. We recognise that our people are a diverse group with a range of valuable backgrounds, experiences, and viewpoints. We embrace and endeavour to support this diversity in all aspects of our employment practice, ensuring that it is a strength and distinguisher, and not a barrier, to success and achievement, both for our colleagues and our business.

Alongside this, we work collaboratively to ensure our workplace operates without discrimination and is free from any form of harassment, victimisation, or bullying.

We believe in treating everyone fairly and equitably. We do so by eliminating discrimination on grounds of any protected characteristics across all areas of employment, including but not limited to:

- Recruitment;
- Training and Development;
- Promotion;
- PDR;
- Reward; and
- Employment terms in general.

Our aim is to ensure that all employees can achieve their full potential and that all employment decisions and actions are free from discrimination, bias, or barriers.

POLICY ASSURANCE ACTIONS

All recruitment and employment decisions are made based on fair and objective criteria.

- Our selection procedures are reviewed regularly to ensure that they are appropriate for achieving our objectives and for avoiding unlawful discrimination.
- The requirements of job applicants and existing employees who have a disability are reviewed to ensure that reasonable adjustments are made where practicable to enable them to enter or remain in our employment.
- Everyone has equal promotion opportunities and facilities of employment.
- Appropriate training is provided across the Company to enable us to collectively implement and uphold our commitment to equal opportunities.
- Anyone who believes that they have been disadvantaged or discriminated against in breach of this policy can raise the matter through our [Dignity at Work Policy](#).
- Anyone who is found to be in breach of this EDI Policy is at serious risk of disciplinary action, up to and including dismissal.

OUR EDI OBJECTIVES

- Ensure our workplace operates without discrimination, and is free from any form of harassment, victimisation, or bullying.
- Promote a working environment where everyone is treated with dignity and respect.
- Create and nurture an environment in which individual differences and the positive contributions of all team members are recognised and valued.
- Encourage and support the personal development and wellness of all our employees.
- Empower our people to challenge unacceptable behaviour and instil trust and confidence in an open and fair process for reporting concerns.

IMPLEMENTATION

This policy will be included in induction packs for new colleagues, sent to all colleagues and displayed on the Company intranet and website. The Company will also provide colleague training on EDI.

The Company will ensure that all line managers are provided with more detailed training on how to manage equity, diversity and inclusion in the workplace.

Training may include:

- an outline of the law covering the protected characteristics and discrimination;
- why the Company has introduced this policy and how it will be put into practice;

- examples of what is and is not acceptable conduct in the workplace;
- the risk of condoning or seeming to approve inappropriate behaviour, and the risk of personal liability; and
- how prejudice can affect the way an employer functions and the impact that generalisations, stereotypes, bias or inappropriate language in day-to-day operations can have on people's chances of obtaining work, promotion, recognition and respect.

Training will be designed in consultation with the Company's EDI Working Group incorporating feedback from previous training. If in-house trainers are used, the Company will ensure that they themselves receive training. External trainers will be fully informed about this policy and other relevant Company policies.

HOW TO MAKE THESE OBJECTIVES A REALITY

Diversity Monitoring	• Collect, monitor, and analyse diversity data regularly to drive focused programmes and initiatives that support the Company's EDI strategy.
Policy Review	• Regularly review all people policies, including terms and conditions of employment to ensure there is no bias, whether unconscious or conscious.
EDI Strategy	• Create and regularly update an annual EDI Strategy which is managed by the EDI Lead alongside an EDI Working Group.
Employee Networks	• Support active Employee Networks which are open for all to join, whether identifying directly with that group or joining as an ally. • These Networks are led by chairs/co-chairs who make up an EDI Working Group which meets regularly, and which strives to ensure diverse groups are represented across the Company and that positive initiatives are developed and introduced that support the Company EDI strategy.
Partnerships	• Review and form partnerships with a range of relevant external partners and associations to raise awareness around subjects that influence the EDI agenda and to drive change.
Engagement and Communications	• Produce and publish regular communications and content that provides information, updates and notifications of events and initiatives related to EDI strategy and activities. • Make all documents available in accessible formats.
Talent Acquisition	• Expand talent pipeline partnerships to positively promote a career in property to underrepresented diverse groups. • Review and expand 'early careers' opportunities including work experience, internships, apprenticeships, and graduate programmes.

	Develop, implement, and review recruitment and selection practices that are open, fair, and free from all bias, and that enable the selection of the best talent.
People Processes	- Using a range of people data, identify any potential barriers to opportunity or progression that may exist and take any necessary positive action to correct these. - Design initiatives that support the Company's EDI Strategy, particularly focussing on talent attraction, skills development, career progression and talent attraction. - Make all pay, progression, recognition and opportunity decisions concerning our colleagues based on merit.
Learning and Development	- Provide all employees with appropriate and regular equity, diversity, and inclusion training. - Provide appropriate and regular training to line managers to ensure all employment practices and procedures are conducted fairly and consistently. - Provide all employees with access to relevant adhoc training, webinars and events to raise levels of awareness and understanding around EDI subjects.
Programme Monitoring	- Agree relevant KPI measures and report annually on progress. - Analyse data to ensure activities are achieving the Company's EDI strategy objectives.
Recognition and Accreditation	Seek external recognition & accreditation at an appropriate point in time.

EQUITY, DIVERSITY AND INCLUSION IN PRACTICE

We have a number of Employee Networks that provide a forum for people who share a common interest in a particular aspect of equity, diversity and inclusion. These groups aim to provide networking opportunities and support, to organise events to raise awareness and inform, and to contribute ideas for ways in which diversity and inclusion can be improved in the organisation. For information on these groups, please visit [Together | Equity, Diversity and Inclusion | LSH](#) or contact together@lsh.co.uk.

WHAT WE EXPECT FROM YOU

- To contribute to a working environment that is accessible, comfortable, healthy, well maintained and welcoming, and that is free from discrimination, harassment, victimisation and bullying.
- To demonstrate and share a commitment to valuing EDI in the workplace and develop attitudes and behaviours that support this.

- To challenge what is considered to be unacceptable behaviour, be pro-active with regard to the Company's EDI strategy, and to take personal responsibility to promote good practice and create change.
- To regularly review and identify your own learning and development needs on EDI matters.
- To undertake relevant training provided by the Company to maintain and improve knowledge and to contribute to the learning and development of others.

DISCRIMINATION

Discrimination refers to the unfair or unjust treatment of people because they possess one of the recognised protected characteristics, which are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race (including colour, nationality and ethnic or national origin)
- Religion or beliefs
- Sexual orientation; or
- Sex.

Equally, LSH will not treat anyone less favourably because they are a trade union member, or on the grounds of working part time or for a fixed term period, or their socioeconomic background or any caring responsibilities that they may have.

Direct discrimination refers to discrimination because of a protected characteristic (above). Examples of this might include paying someone less because of their sex or the colour of their skin. Less favourable treatment may also arise where someone is associated with another person who has a protected characteristic, for example where an employee is the primary carer for a disabled child. Direct discrimination may also result from perception, whereby an individual is assumed to have a protected characteristic, regardless of whether this perception is correct or not. For example, someone may be perceived as being a particular religion, age, or sexual orientation.

Indirect discrimination refers to treating a group of people in the same way, but in a way that adversely affects those with a protected characteristic. An example of this would be telling all employees that

they must work late at night—although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women or single parents.

BULLYING AND HARASSMENT

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate, or injure the person at whom this action is directed.

Harassment can include unwelcome physical, verbal, or non-verbal contact. It may be related to but not limited to one of the protected characteristics and has the purpose or effect of violating a person's dignity; or is reasonably considered to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended.

If you consider that you have been, or are being, harassed by another employee, or you would like to understand more about bullying and harassment, please see our [Dignity at Work policy](#).

VICTIMISATION

Victimisation refers to unfair treatment directed towards someone who has made or is believed to have made or supported a complaint of discrimination. We will ensure that if you bring a complaint of discrimination or harassment or give any evidence or information relating to an act of discrimination or harassment, you will not suffer any detriment as a result of doing so. However, to ensure that individuals are not falsely accused, any person who makes an allegation of discrimination or harassment which they know to be false, will be subject to disciplinary action.

If you are found to have discriminated, harassed, or victimised another employee or a client, we will take disciplinary action against you as such behaviour will not be tolerated.

HOW TO REPORT A CONCERN

If you feel you may have been discriminated against or believe you have been subject to harassment at work, we encourage you to follow our [Dignity at Work policy](#).

Any complaints received from anyone outside of the Company will be reviewed under our [Complaints Handling Procedure](#).

If you have any wider concerns about corporate matters, we encourage you to follow our [Whistleblowing Procedure](#).

CONTACTS AND FURTHER INFORMATION

To find out more, please visit our LSHTogether Website (<https://www.lsh.co.uk/lshtogether>). Related relevant EDI policies include:

- [Equal Pay Statement](#);
- [Dignity at Work Policy](#); and
- [Sexual Harassment Policy](#).

If you have any questions or requests for additional information on this policy, please contact HROperations@lsh.co.uk.