

Diversity, Equity and Inclusion

1.0 INTRODUCTION

At Identity, we are dedicated to actively promoting diversity, equity and inclusion. We're committed to creating an agency and community, where every voice, every perspective, every great idea can be heard. A place where our people feel like they can truly belong. We know that when we all feel welcome, safe, supported, valued, and when we can bring our authentic selves to work each day, we will be able to do our very best work.

We strive for fairness, celebrate differences, and create a sense of belonging for all. These principles of diversity, equity, and inclusion are the foundations of our values and success. By nurturing an inclusive work environment, we are not only enriching ourselves as individuals, but we are harnessing the diverse perspectives, experiences, and skills that collectively enable our success.

We know that simply having a diverse workforce is not enough. Our goal is to establish a truly inclusive workplace where each individual can thrive and develop to their full potential.

We also want to celebrate the uniqueness of every individual. We are committed to treating each person with dignity and respect by fostering a workplace that embraces diversity, care, and optimism.

2.0 SCOPE

This policy applies to all employees and workers employed by us. Other individuals, including our freelancers, contractors, subcontractors, suppliers, interns and apprentices are also encouraged to follow the procedure set out in this policy.

It is important to note that this policy does not form part of any employee's contract of employment and may be subject to amendments at any time.

As a global company, we recognise that cultural norms and expectations vary across regions and are committed to respecting these differences by adopting inclusive and culturally sensitive practices wherever we operate.

The policy accompanies our anti-harassment and anti-bullying policy and (any other equity, diversity and inclusion (DEI) policies adopted by our business).

If it is found that any person has committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) instigating our Disciplinary procedure. We have a zero-tolerance approach to any form of workplace discrimination.

3.0 PRINCIPLES.

3.1 What is Diversity? A definition

At Identity we want all our people to feel like they have a home. That they belong. That they have a meaningful part to play. We believe that's possible when they're heard, and they feel

reflected both at work, and in the work we create. We believe Identity should be as diverse, creative and inspiring as the world we live in, this is regardless of:

- Gender
- Sexual orientation
- Pregnancy
- Gender identity
- Race or ethnicity
- Religion or religious belief
- Culture
- Marital and civil partnership status
- Age
- Educational background
- Physical ability
- Cognitive capabilities
- Neurodiversity
- Caring responsibilities
- Political opinion
- Physical appearance

We embrace diversity in our business and cultivate an authentic culture which allows everyone to be their true selves.

3.2 What is Inclusion?

Inclusion is a practice which goes beyond diversity. It involves creating an environment where every person feels valued, respected and engaged for their uniqueness, talents, beliefs, backgrounds, abilities and ways of working. It is also about building a sense of belonging, where diverse perspectives are not only accepted but actively sought after. Ultimately this creates a culture where everyone has a voice.

Inclusion requires us all to commit to behaviours that allow everyone at Identity to bring their authentic selves to work each day. A community where everyone feels they can contribute and do their very best work.

3.3 What is Equity? A Definition

Equity recognises that individuals have diverse circumstances and is a commitment to fairness and impartiality in treatment, ensuring a balance of opportunities for all based on individual needs.

For Identity, equity is an important element in our approach as this covers areas such as equal opportunity to progress, equal pay and equal access to training and development etc. To us, equity means levelling the playing field for all. It means that at Identity, everyone has an equal opportunity to thrive.

Equality is referred to within this policy; however, equality is different as it refers to providing everyone with the same access from the same starting point, equity recognises that not everyone begins from an equal position. In other words, equality ensures equal treatment, while equity focuses on fair outcomes, accounting for individual differences and circumstances.

3.4 Protected Characteristics

Protected characteristics are certain personal characteristics that are legally protected from discrimination under the Equality Act 2010. The Act is designed to prevent discrimination and promote equal opportunities for individuals in various aspects of their lives, including employment, education, and access to goods and services. The protected characteristics outlined in the Equality Act 2010 are:

- disability
- sex
- gender reassignment
- marital or civil partnership status
- race
- religion or belief
- sexual orientation
- age
- pregnancy or maternity status

Discrimination based on any of these characteristics is unlawful and individuals are protected from unfair treatment, harassment, and victimisation on these grounds. However, as a business, we will not condone any form of discrimination, whether or not it is listed within the Act.

3.5 Intersectionality

Intersectionality recognises that people hold multiple, overlapping identities such as race, gender, sexuality, disability, class, age, and religion and that these identities combine to shape each person's unique experience of the world. Discrimination and disadvantage rarely operate in isolation; someone may face barriers not simply because of one aspect of who they are, but because of the way several identities intersect and interact. At Identity, we acknowledge that a one-size-fits-all approach to inclusion will inevitably leave some people behind. Understanding intersectionality means looking beyond broad categories and taking the time to consider how different combinations of identity and experience may affect a colleague's access to opportunities, their sense of belonging, or the challenges they face in the workplace. Our commitment to equity therefore means being attentive to the whole person recognising complexity, avoiding assumptions, and ensuring that our policies, practices, and culture work for everyone, not just the most visible or loudest voices in the room.

3.6 Different types of discrimination under the Equality Act 2010

Discrimination isn't always clear; it can be subtle and unconscious. This happens when people make assumptions about a group's abilities, interests, or characteristics (known as "unconscious bias"). These assumptions or prejudices may lead to applying conditions that disadvantage people in those groups. The Equality Act defines that discrimination can take one of the following forms:

- Direct discrimination: Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic
- Indirect discrimination: Where a policy, procedure or work approach that applies to everyone puts people with a particular protected characteristic at a disadvantage compared to those without that characteristic, unless there is a valid reason to justify it.
- Harassment: This includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which violates someone's dignity or creates an intimidating, hostile, degrading humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- Victimisation: Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Discrimination arising from disability: This includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

4.0 What we expect from you

Identity Group is passionate about ensuring all our people are able to work within a culture that is accepting of, and respectful towards others at all times. We expect you to take personal responsibility for observing, upholding, promoting and applying this policy. We all have a responsibility to behave in a way that is respectful of who we work with and to understand that our views and opinions may not always be the same as others. Our culture is something we all create that is developed in all of our day-to-day working interactions, therefore, creating the right environment is a responsibility that we all share.

We expect you to treat those that you work with and third parties (including customers, freelancers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust, warmth and respect and not creating an intimidating, hostile, degrading, humiliating, or offensive environment for anyone. A hostile or intimidating environment is not solely created by behaviour but can be influenced by other factors such as displaying emblems, badges, clothing, tattoos, posters, graffiti, images, or literature that may be offensive to others.

It is the responsibility of all of us to embed these values each day, and to constructively and respectfully challenge any inappropriate comments or ways of working we might see or experience. You can help us achieve and maintain a truly inclusive workplace culture.

Here is other some things you can do to help create an inclusive workplace:

- Try to understand others points of view, and support them to understand yours
- If you ever see inappropriate behaviour, challenge or report it - if you challenge others, do so in a respectful way
- Be aware of different cultures and customs, and respect the benefits that diversity can bring
- Respect the confidentiality of those that you work with inside and outside the business
- Treat all with respect and in an ethical and lawful way at all times
- Take responsibility for your own actions

- Look for solutions to problems and try to resolve issues constructively

4.1 Allyship

Not only do we expect you to treat your colleagues with dignity, fairness and respect but we actively encourage Allyship. Allyship means actively supporting colleagues from underrepresented or marginalised groups; not just in moments of visible injustice, but as a consistent part of how we work every day. At Identity, we expect everyone, regardless of their background or seniority, to listen with genuine curiosity and an open mind, speak up when they witness exclusionary behaviour, and use whatever privilege or platform they have to support colleagues from marginalised groups whose voices are not being heard, or whose opinions are being overlooked. Being an ally is an ongoing commitment to reflection, action and learning. We recognise that we might not always get it right and we encourage a culture where people keep talking and feeding back so that those conversations lead to growth rather than defensiveness. We are committed to providing resources and opportunities for our people to develop their understanding of allyship, and we hold ourselves accountable to making this a workplace where everyone feels genuinely seen and supported.

5.0 Our commitment to you

We know fostering a culture of diversity, equity and inclusion not only benefits our business, and allows us to improve the work we create, but contributes to overall wellbeing, facilitating improved performance and allowing us to authentically express ourselves.

- Our goal is to create a workforce that's representative of our society and community.
- We appreciate everyone's contributions and actively celebrate diversity across all aspects of our agency.
- We strive for a truly inclusive workplace, where we welcome the similarities and differences of all.
- We are committed to supporting the unique and diverse needs of our clients, our business and our communities.
- Our suppliers, clients and partners are expected to actively support and demonstrate their commitment to us achieving a diverse and inclusive culture.
- We are opposed to all forms of unlawful and unfair discrimination.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation. Identity will champion an equitable workplace.

5.1 Equity of opportunity

We are committed to equity of opportunity in our recruitment and career development processes. We attract diverse applicants and ensure decisions are free from discrimination. Through diversity training and disability inclusion, we support all candidates and employees by providing necessary accommodations and fostering an inclusive environment.

5.1.1 Recruitment and Selection

We will take steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way and must have attended appropriate diversity and inclusion training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

This includes a specific and explicit commitment to race equality. Identity does not discriminate on grounds of race, colour, nationality, or ethnic or national origin at any stage of recruitment, training or promotion. All those involved in making such decisions are required to apply this commitment consistently and are supported to do so through our training programme.

5.1.2 Career development

Any decision made relating to a person's promotion or career development will be free from discrimination.

We will ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

5.1.3 Disabilities

Disability will be considered in advance of any recruitment opportunity and campaign to ensure the whole recruitment process is as inclusive as possible.

We will ask candidates at the outset if any reasonable adjustments are required, this will apply during the recruitment process and beyond.

Applicants will not be asked about their health or disability during the interview process.

We will ensure psychological safety, where people feel able to speak up about their experiences without fear of negative consequences. This may be by speaking to your manager or a member of the PX team. We also have a Whistleblowing policy which can be accessed via our HRIS (HR Information System).

5.1.4 Reasonable adjustments

If you have a disability, there is no obligation to disclose it to the business. However, we encourage you to share this information with us so that we can offer support. This may include making reasonable adjustments to premises, your role, or our working practices.

Should you encounter challenges at work due to your disability, please reach out to your manager or the PX team. This will allow us to explore potential reasonable adjustments that could alleviate or minimise these difficulties. We may need to have a discussion with you and your medical adviser to ensure the appropriate support is implemented.

If you're returning from a prolonged disability-related absence, we will support you to re-adjust to work.

By embracing diversity and fostering an inclusive environment, we adhere to ethical standards and unlock the full potential of our teams. We believe that everyone deserves equal opportunity and a respectful environment to be themselves, develop their skills, achieve their potential and we are committed to ensuring our people are recognised and rewarded equally for who they are, their work and contributions.

We appreciate the collective effort of the entire Identity community in driving diversity, fostering inclusivity, and creating a workplace where everyone can thrive. We are committed to being a safe, supportive, diverse, and inclusive agency where our people can do just that.

5.1.5 Training and Awareness

We conduct an annual training needs analysis to identify gaps in DEI understanding across the business. Findings are shared with the Senior Leadership Team and used to update our training programme. DEI competencies are built into recruitment, performance review and development frameworks. Progress against training commitments is reported to key stakeholders each year

5.1.6 Monitoring and Review

We will establish appropriate information and monitoring systems to assist the effective implementation of our DEI policy

The effectiveness of this policy will be reviewed annually in consultation with employees and action taken as necessary.

Recruitment policies and procedures will be reviewed regularly to ensure that they do not discriminate or create unfair conditions of employment

5.1.7 Management & Stakeholders

To support the DEI policy, the Senior Leadership Team will:

- Support and drive the educational programme
- Work closely with key stakeholders such as clients and suppliers to achieve the aims of this policy.

6.0 BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

7.0 DOCUMENT INFORMATION

Date of review: June 2026

Next review: June 2027