CITY & ESSEX

2026

Equality, Diversity, Inclusion & Anti-Harassessment **Policy**

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1.MISSION STATEMENT

City & Essex is committed to creating and maintaining a working environment where people are treated with dignity, fairness and respect. We value equality, diversity and inclusion across our workforce, supply chain and client relationships, and we do not tolerate discrimination, bullying, harassment, sexual harassment, victimisation or retaliation.

This policy sets out our overarching approach to equal opportunity, inclusive working practices, anti-harassment prevention, accessible reporting and continuous improvement. It is intended to sit above the detailed HR policies, employee procedures, reporting routes and training records used across City & Essex operations.

2. SCOPE

This policy applies to City & Essex Limited and all affiliated subsidiaries. It applies to employees, workers, agency workers, apprentices, contractors, subcontractors, consultants and anyone working on behalf of City & Essex, where relevant to their role or contractual relationship.

- Head Office, management and support functions.
- Site-based employees and operational cleaning teams working across client locations.
- Supervisors, managers and authorised managers responsible for recruitment, development, supervision, investigation or employee support.
- Work-related events, communications, online platforms, client sites, supplier interactions and any environment where people are representing City & Essex.

Supplier and subcontractor expectations are also supported by the Supplier Code of Conduct, Sustainable Procurement Policy, Modern Slavery & Human Rights Policy and relevant client site requirements.

3. REPLACED DOCUMENTS

This policy replaces the previous Equality & Diversity Policy as City & Essex's top-level equality, diversity, inclusion and anti-harassment policy, subject to final HR review and approval.

Detailed HR platform policies and procedures, including Equal Opportunities, Bullying & Harassment, Sexual Harassment, Standards, Social Events, Social Media, grievance procedures and confidential reporting routes, remain in force unless separately updated.

4. FRAMEWORKS & LEGISLATION

This policy is informed by applicable UK employment, equality and worker-protection requirements and recognised responsible business principles, including where relevant:

- Equality Act 2010.
- Worker Protection and related UK requirements on prevention of sexual harassment.
- Employment Rights Act 1996 and related UK employment protections.
- Protection from Harassment Act 1997.
- Health and Safety at Work etc. Act 1974, where dignity, wellbeing and psychological safety are relevant.
- Modern Slavery Act 2015, where labour exploitation, coercion or worker vulnerability may be relevant.
- ILO principles on non-discrimination, fair treatment and decent work.
- UN Guiding Principles on Business and Human Rights.
- City & Essex Working Conditions, Wages & Employee Voice Policy.

5. POLICY COMMITMENTS

1. Equal Opportunity and Fair Treatment

City & Essex will provide equal opportunity and fair treatment in employment, recruitment, training, development, promotion, performance management and day-to-day working relationships. Decisions should be based on skills, experience, conduct, performance, business need and role requirements, not on protected characteristics or irrelevant personal factors.

We will not tolerate discrimination, victimisation or unfair treatment on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or any other characteristic protected by law.

2. Inclusive Working Environment

City & Essex will promote a working environment where employees and workers can contribute safely and confidently. We recognise that our workforce includes people from different backgrounds, cultures and language groups, including site-based employees and employees whose first language may not be English.

We will make important employment information, reporting routes and support mechanisms accessible and understandable, using appropriate communication methods and reviewing accessibility for site-based employees and employees whose first language is not English.

3. Recruitment, Development and Progression

City & Essex will ensure that recruitment, onboarding, training, development and progression processes are fair, transparent and free from discrimination.

Managers involved in recruitment, supervision or development decisions are expected to apply consistent criteria, avoid bias and escalate concerns where a process may create unfair barriers.

4. Bullying, Harassment and Sexual Harassment

City & Essex does not tolerate bullying, harassment, sexual harassment or any conduct that undermines dignity, respect or psychological safety. This applies whether the conduct takes place in person, online, by message, at work-related events, on client sites, during travel, or in any work-related setting.

Sexual harassment is treated as a serious matter. City & Essex will take reasonable steps to prevent sexual harassment, respond to concerns promptly and take appropriate action where concerns are upheld.

5. Third-Party Harassment and Work-Related Conduct

City & Essex recognises that employees may interact with clients, suppliers, subcontractors, visitors, members of the public and other third parties. Concerns involving third-party conduct should be reported and managed appropriately, with support provided to affected employees where needed.

Employees representing City & Essex at social events, supplier meetings, client sites, training sessions or online must behave in a manner consistent with this policy and the Company's standards of conduct.

6. Reporting, Grievance and Protection from Retaliation

Employees and workers are encouraged to raise concerns about discrimination, bullying, harassment, sexual harassment, victimisation or unfair treatment as early as possible. Concerns may be raised through line managers, HR, grievance procedures, confidential reporting routes or whistleblowing channels where appropriate.

City & Essex will treat concerns seriously, sensitively and, where possible, confidentially. Retaliation, victimisation or detrimental treatment of anyone who raises a concern in good faith will not be tolerated.

7. Training, Communication and Awareness

City & Essex will provide access to relevant information, communication and training on equality, diversity, inclusion and anti-harassment expectations. This may include induction, HR portal guidance, manager briefings, online training, policy reminders and targeted communications where required.

8. Monitoring and Continuous Improvement

City & Essex will monitor relevant EDI and anti-harassment information where appropriate, including training records, concerns raised, complaints, investigation outcomes and corrective actions. This information will be used to identify trends, improve controls and strengthen prevention where needed.

6. TARGETS AND MEASUREMENT

City & Essex will use 2024 as its ESG baseline year unless a more specific baseline is stated.

Area	Baseline / Context	Target	Deadline
Policy access	Equal Opportunities, Bullying & Harassment and Sexual Harassment procedures are available through the HR portal	Maintain employee access to EDI, bullying, harassment and sexual harassment procedures through the HR portal or equivalent employee-facing system	Ongoing
Reporting routes	Confidential/ anonymous reporting routes and HR/manager escalation routes exist	Review EDI and anti-harassment reporting routes for accessibility to site-based employees and employees whose first language is not English	End 2026
Training and awareness	EDI and sexual harassment awareness supported through induction, communications or online learning where relevant	Maintain records of EDI, equal opportunities, anti-harassment or sexual harassment training/communicatio n where delivered	Annual
Incident review	Complaints and concerns handled through HR procedures	Review discrimination, bullying, harassment and sexual harassment concerns and corrective actions to identify trends or prevention measures	Annual

Reporting will be handled confidentially, sensitively and in line with data protection and employment requirements.

7. RESPONSIBILITIES

Managing Director

The Managing Director has ultimate accountability for this policy and for ensuring that equality, diversity, inclusion and anti-harassment remain part of City & Essex's responsible business approach.

Head of People & Culture

The Head of People & Culture is the policy owner and is responsible for maintaining this policy, overseeing relevant HR procedures, supporting managers, coordinating employee communications and ensuring concerns are handled through appropriate routes.

Head of ESG

The Head of ESG supports this policy by aligning EDI and anti-harassment evidence with ESG reporting, EcoVadis requirements, client assurance and responsible business commitments where relevant.

Head of HSEQ

The Head of HSEQ supports this policy where dignity, wellbeing, psychological safety, site controls and operational risk management intersect with health, safety and wellbeing responsibilities.

Operations Managers, Site Managers and Supervisors

Operations Managers, Site Managers and Supervisors are responsible for applying this policy fairly, escalating concerns, supporting respectful conduct, avoiding retaliation and ensuring site-based employees know how to access relevant support or reporting routes.

Employees, Workers and Subcontractors

Employees, workers and subcontractors are expected to treat others with dignity and respect, comply with this policy, report concerns in good faith and avoid discriminatory, bullying, harassing or retaliatory behaviour.

Suppliers and Third Parties

Suppliers, subcontractors, clients, visitors and other third parties are expected to behave respectfully when engaging with City & Essex employees and representatives. Supplier expectations are also supported by the Supplier Code of Conduct.

8. SUPPORTING PROCEDURES AND EVIDENCE

This policy sets out City & Essex's overarching commitments, responsibilities and objectives. It is supported by relevant HR policies, reporting routes, training records, communications, investigation records, client requirements, supplier documents and statutory obligations.

Supporting documents and evidence may include:

- Equal Opportunities policy.
- Bullying & Harassment policy.
- Sexual Harassment policy.
- Standards and conduct guidance.
- Social Events and Social Media policies where relevant to conduct.
- Grievance, disciplinary, whistleblowing and confidential reporting procedures.
- EDI, equal opportunities or anti-harassment training and communication records.
- Complaint, concern, investigation and corrective action records where available and appropriate.
- Employee Handbook and HR Portal Evidence Statement.
- Supplier Code of Conduct and relevant client site requirements.

These supporting documents provide the detailed controls used to implement this policy in day-to-day operations.

9. REPORTING AND REVIEW

This policy will be reviewed annually, or sooner where required by legislation, client requirements, EcoVadis reassessment, material operational changes, significant concerns, HR review findings or changes to employee reporting arrangements.

Equality, diversity, inclusion and anti-harassment performance will be reviewed through HR processes, reporting records, training and communication records, management review, employee feedback routes and ESG evidence review where relevant.

Business Name: **City & Essex Ltd**
Approved and Signed By: **Ian Hookway, Managing Director**
Approval Date: **October 2026**

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