Equality, Diversity and Inclusion Policy

Scope

CMC Partnership Consultancy Ltd ('CMC') supports businesses to achieve their transformation aims through the provision of change management consultancy services.

CMC policies provide a framework for corporate governance. Policies, corporate statements and procedures are reviewed on a regular basis to ensure they meet the needs of the business, including all regulatory, audit and contractual compliance requirements. Changes to policy will be communicated and further training provided if required.

Roles and responsibilities

- Company directors are responsible for creating an organisational culture which supports delivery of the company's policy objectives.
- Business and line managers provide policy awareness through induction and ongoing training.
- All employees and users of company IT services have a responsibility to adhere to company policy.
- Parties working on behalf of CMC – sub-contractors, third party suppliers and business partners – will be contractually required to comply with specific policies and procedures: Anti-Bribery & Corruption, Environmental, Health & Safety, and Equality policies, CMC's Modern Slavery Statement. Anti-Bullying, Harassment & Acceptable Use and the Information Security Management, Digital & Social Media policies may also apply, depending upon the level of engagement. These documents will be made available on CMC's website, or shared directly with third parties as defined in their contractual agreements.

Non-adherence to CMC policies, associated procedures and formal guidance may result in disciplinary action, including dismissal or contract termination. It may also invoke criminal and/or civil penalties.

This policy set is provided to staff as part of the company's induction process and is shared annually as a refresher to all permanent employees. Recipients are required to sign for receipt and understanding and encouraged to request further information and/or training at any time via their line manager.

This policy set was reviewed and approved by the CMC Operations Board.

Date: 22.09.2026

Signed by: Jeanette Lane, Director



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Equality, Diversity and Inclusion Policy

CMC is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. CMC endeavours to promote working practices and policies which support fairness, equality, mental health and respect and to ensure all aspects of our business activities are managed in a transparent, fair and non-discriminatory way.

CMC employees are expected to comply with this policy and to always treat people with dignity and without discrimination.

Discrimination can be made in relation to any one of the nine protected characteristics detailed in the Equality Act 2010 – age, disability, gender, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Discrimination could occur in the following ways:

1. Direct discrimination involves treating a person less favourably on any of the above grounds; for example, it is unlawful direct sexual discrimination to treat a woman less favourably because she is pregnant.
2. Indirect discrimination occurs where a policy applies to everybody, but the policy has a disproportionate impact on people with a protected characteristic to their disadvantage and is not a proportionate method to achieve a legitimate aim.
3. Harassment is defined as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. Employees can complain of harassment even if they don't possess the protected characteristic or the harassment is not directed at them; for example if they overhear or are party to a conversation which they find offensive.
4. Victimisation occurs when a person is treated less favourably than others because that person has made or supported a complaint or raised a grievance under applicable equality legislation, or because they are suspected of doing so.
5. Associative discrimination is discrimination against a person because they have an association with someone with a particular protected characteristic. This applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex. An example of associative discrimination might be a non-disabled employee who is discriminated against because of action they need to take to care for a disabled dependant.
6. Perceptive discrimination is discrimination against a person because the discriminator thinks the person possesses that characteristic, even if they do not in fact do so. Perceptive discrimination applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex.

Dealing with inappropriate behaviour and raising complaints

If you believe that you are suffering or have suffered from discrimination you can raise the matter informally with the person you believe is responsible, or you may raise the matter formally using the Grievance Procedure (see below). If you

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believe that you may have suffered from harassment, then you may also bring a grievance or raise the matter as laid out in the Anti-Bullying and Harassment Procedure (see below).

Grievance Procedure

Purpose and scope

CMC understands that there needs to be a clear way for CMC employees to raise concerns. The purpose of this procedure is to enable any employee of CMC to raise a grievance or complaint arising out of their employment with CMC and to have it dealt with speedily and fairly.

This procedure is based on the ACAS Code of Practice. A flowchart of the process is attached at the end of this procedure.

Principles

- All genuine grievances will be taken seriously by CMC.
- All grievances will be fully investigated and responded to promptly.
- You may use this procedure in good faith, freely and without prejudice to your position in CMC, irrespective of your job or grade.
- An employee can raise a grievance if they feel raising it informally has not worked, they do not want it dealt with informally, or it's a very serious issue, for example sexual harassment or 'whistleblowing'.
- The outcome of a formal grievance will be confirmed in writing.
- Wherever possible, any appeal meeting will be attended by a more senior manager than the original grievance meeting.
- Following any appeal meeting, you will be notified of CMC's final decision. The time limits in this procedure may be extended with the agreement of all parties concerned, or where it is not reasonably practicable to comply with the time limits in all of the circumstances.

Consequence of not following the grievance procedure

If you do not follow this procedure you will not be prevented from bringing a claim in an Employment Tribunal; however if a Tribunal finds that you have unreasonably failed to follow the ACAS Code, any award made may be reduced by up to 25%.

Roles and responsibilities

- Employees are encouraged to raise minor concerns informally with their line manager.
- Employees can receive independent advice and support throughout this process from the Company Secretary.
- Employees have the right to appeal against any grievance finding.

Procedure

1. Informal process

You are encouraged to raise minor concerns on an informal basis with your line manager.

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2. Formal process

If you are dissatisfied with the outcome of an informal consultation with your manager or consider the matter too serious to be addressed in an informal manner, the formal procedure should be used.

2.1. Written statement of grievance

Under the formal procedure, you should send a written statement of your grievance to your manager (unless the grievance concerns your manager in which case the written grievance should be submitted to the Company Secretary or a CMC director). The written statement should set out your dissatisfaction and the grounds for the grievance and should be submitted without unreasonable delay. CMC will attempt to deal with the grievance (after carrying out such investigation as is necessary) within a period of 14 working days from receipt of the written statement.

2.2. Grievance hearing

A meeting will be held to decide whether to uphold the grievance. You will be given at least 3 working days' notice of the date and time of the grievance meeting and all attempts will be made in advance to establish a mutually convenient time to meet.

You should take all reasonable steps to attend the grievance meeting. If you are unable to attend for a legitimate reason, the meeting will be postponed once. If you do not attend without a reasonable explanation or for a second time, CMC will conclude that you no longer wish to proceed with your grievance.

If you would like the support, you may choose to be accompanied at the meeting by an appropriate CMC work colleague of your choice. Your companion may ask questions, address the hearing and confer with you, but is not entitled to answer questions on your behalf. If your chosen companion is not available, the grievance meeting will be postponed to a more mutually convenient time within the next 5 working days. You should inform the appropriate manager in advance of the meeting if you will be accompanied and if so by whom.

2.3. Investigation

The grievance meeting may be adjourned in order to carry out further investigation where necessary. If so, the appropriate manager will conduct such investigation as is reasonable in all the circumstances.

2.4. Outcome

Following such investigation as is necessary, the appropriate manager will inform you of the decision in response to your grievance and of your right to appeal.

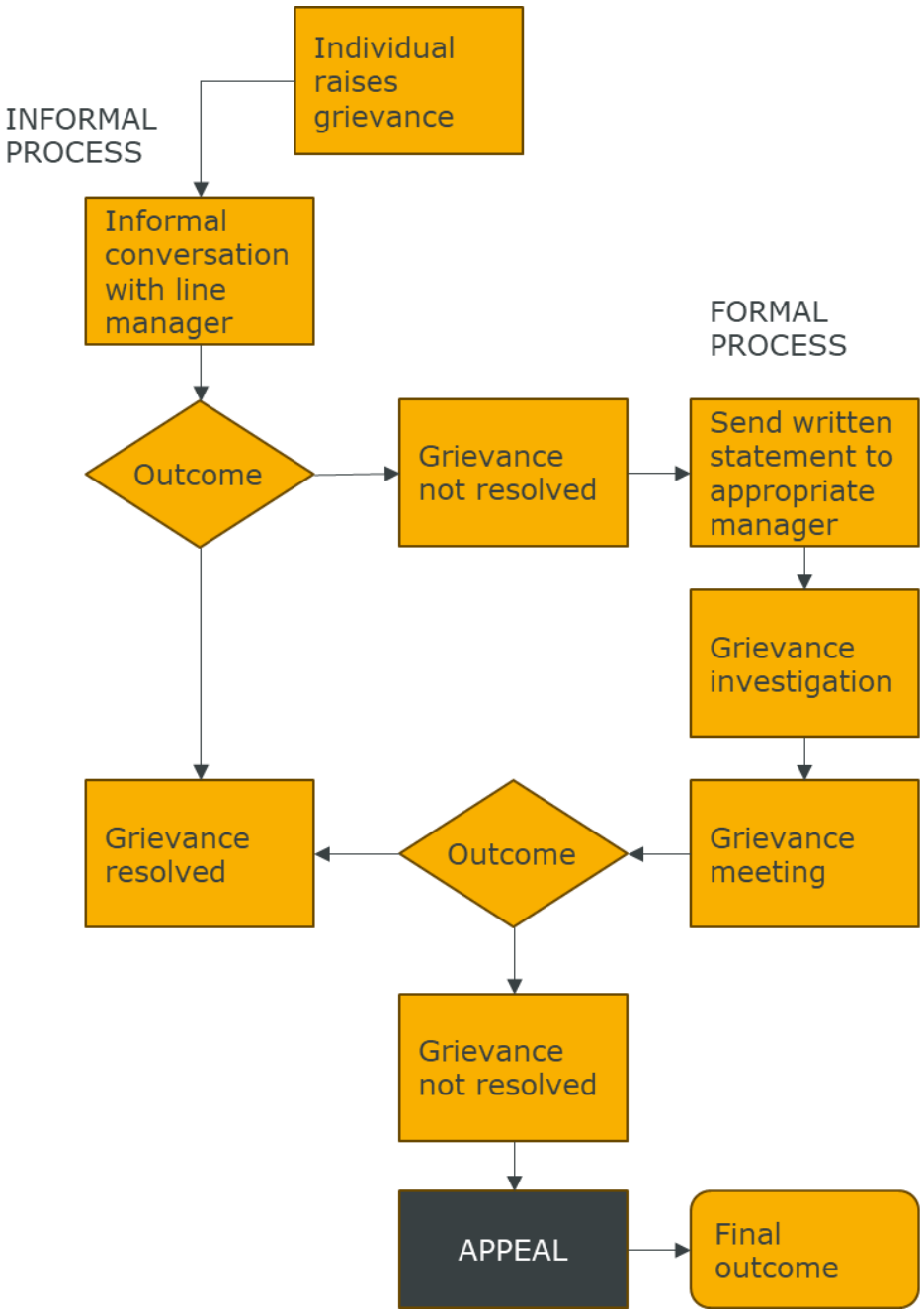
2.5. Appeal Procedure

If you are dissatisfied with the finding, you can appeal. You will be informed to whom you should address an appeal when you receive notification of the outcome. Your appeal must be lodged in writing within 5 working days of being notified of the decision. The appeal request must state the grounds of the appeal, i.e. why you think the decision is wrong. This may be because you think the outcome is unfair (giving the reasons for this), because new evidence has come to light, or because you think the correct procedure was not followed.

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The timing, attendance and right to be accompanied at appeal hearings are the same as described above with respect to grievance meetings. You will be notified of the outcome of the appeal in writing. The appeal decision is final and CMC's grievance procedure is exhausted at this stage.

Flowchart of the grievance process



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Anti-Bullying & Harassment Procedure

Objective and scope

CMC has a long-standing commitment to a workplace environment that respects the dignity and worth of each individual. Inappropriate workplace behaviour and harassment are wholly inconsistent with this commitment. CMC takes a zero tolerance approach to any type of bullying or harassment.

This document sets out CMC's procedure for dealing with these types of incidents if they occur to ensure all employees are treated with dignity and respect and are free from harassment, intimidation, victimisation or other forms of bullying at work; whether on CMC premises, on customer site or other work-related settings and applies regardless of the individuals involved.

Resolution process

CMC strongly encourages the prompt reporting of all incidents of bullying, harassment, or inappropriate use of language through company systems, including social media.

The company encourages informal resolution as a first step but recognises support must be provided to all employees to ensure incidents are quickly and effectively resolved.

Where more formal support is required please report the matter to any CMC manager who will ensure that the situation is investigated and resolved.

Those who are asked to investigate the harassment or bullying will:

- listen to the complaint in full and take it seriously
- remain impartial and reach conclusions based upon the reported facts of the case
- take action to prevent any further harassment or bullying, either themselves, or by referring it to other managers
- follow CMC's disciplinary or grievance procedures when appropriate

Informal resolution

1. You may wish to attempt to resolve the problem in the first instance by explaining to the person responsible why the behaviour is offensive and ask him/her to stop the unwelcome behaviour. You may wish to have another person present when explaining that you find the behaviour inappropriate.
2. The intention of the informal stage is to resolve the matter as quickly and amicably as possible. It is particularly appropriate in circumstances where the person responsible may be unaware that he/she is causing offence. At this stage you may not wish any investigation to take place and where possible your wishes will be complied with.

Formal procedure

1. If the informal resolution is inappropriate or the outcome has been unsatisfactory, the formal procedure may be appropriate. To bring a formal complaint of harassment or bullying, you can follow CMC's Grievance Procedure. You can also take your complaint to any manager and should

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make it clear that it is a formal complaint. In either case the following procedure will normally be followed.

2. You will be asked to put your formal complaint in writing setting out the full details of the unwanted conduct.
3. A formal meeting will be held with the alleged harasser/bully to establish his/her response to the complaint. They are entitled to be accompanied to this meeting by a CMC employee or a trade union representative. A companion may not answer questions on their behalf, but may present their case, sum up and respond on their behalf to views expressed at the meeting.
4. Further investigations may then be carried out, including interviews with any potential witnesses. The investigation will be carried out in an independent manner with the respect for the rights of all parties being respected. The importance of confidentiality will be stressed to all those involved in the procedure and they will be required not to discuss the complaint with colleagues or friends.
5. A meeting will then be arranged to discuss your complaint, during which you may be asked further questions as a result of any information uncovered in the investigation. You have a right to be accompanied at that meeting by a CMC employee or a trade union representative. If the person you wish to attend the meeting with you is unavailable at the date proposed then the meeting will be postponed to a more mutually convenient time within 5 working days. A companion's role is as described previously.
6. In circumstances where it is not appropriate for the alleged harasser/bully and the complainant to work together, then consideration will be given to moving the alleged harasser/bully or suspending him/her while the investigation is ongoing. If this is not possible then the complainant may be given the opportunity to remain at home on special leave until the matter is resolved.
7. CMC will aim to complete the investigation as quickly as possible. Following an investigation, the evidence will be considered and a decision taken as to what (if any) action is appropriate. If the complaint is upheld, disciplinary action (up to and including dismissal) is likely. Where the harasser/bully is not an employee, we will consider what action is appropriate in the circumstances.
8. Complaints that are unfounded and not made in good faith will be treated as a disciplinary offence. Complainants will not, however, be penalised for bringing a complaint in good faith. Victimisation and retaliation against such complainants will not be tolerated and may be treated as gross misconduct in the same way as harassment and bullying.

Appeal procedure

1. If you are not satisfied with the decision you may lodge an appeal. You will be informed following the investigation to whom you should send an appeal. This would usually be a CMC director. Your appeal must be lodged in writing within 5 working days of being notified of the decision.
2. The director, or their designate if deemed appropriate, will hear the appeal, ideally within 10 working days of receiving an appeal letter.

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3. You will have the right to be accompanied at an appeal hearing by a colleague or a trade union representative of your choice and your companion's role is as described previously.
4. Once a decision has been reached you will be informed of it (and the reasons for it) in writing. The appeal decision will be final.

Advice and support

You may seek advice and support from the Company Secretary at any point if you feel you are being bullied or harassed. Managers may also raise concerns at any stage and should speak to the Company Secretary as soon as a member of staff raises a concern, and at the latest before starting the formal procedure.

Definitions

1. Harassment

Harassment can broadly be said to include a range of unwelcome behaviour which, whether intentionally or not; creates feelings of embarrassment, humiliation, intimidation or discomfort or causes offence, and/or threatens or appears to threaten job security or prospects.

Harassment can also be defined as unwanted conduct based on sex, sexual orientation, marital status, race, ethnic or national origin, religion or belief, disability or age which has the purpose or effect of violating an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment can also occur if an individual engages in any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which violates another person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

2. Bullying

Bullying can be defined as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Legitimate or constructive criticism or management of your performance or behaviour is not bullying, nor is an occasionally raised voice or an argument. Examples of bullying might include ridiculing or demeaning others, particularly junior colleagues, criticising a colleague in public and repeatedly putting unacceptable pressure on subordinates, such as imposing unachievable deadlines.

3. Defamation

Defamatory comments are ones that could be held to libel a third party either directly or indirectly and are sent or shown to somebody other than the sender and the person(s) or company commented about. CMC follows the definition of defamation that exists in law.

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