

Group Diversity and Inclusion Policy

Scope and responsibility

The Diversity and Inclusion Policy ('Policy') sets out Marlowe PLC's ('Marlowe') approach to diversity and inclusion. The group is fully committed to non-discrimination with respect to employment decisions and working conditions. This Policy is applicable to all employees of the Group (whether full-time, temporary, casual, part-time or on fixed term contracts). Third parties including suppliers should be made aware of and act in accordance with this policy.

The Board has overall responsibility for the oversight and implementation of this policy and will be supported in its implementation through divisional management. The Nomination Committee are responsible for the annual review and approval of this policy, and all relevant stakeholders will be made aware of any changes.

Introduction

Marlowe is committed both as an employer and as a provider of services to businesses and the wider community, to promoting diversity, equal opportunities and non-discrimination. We recognise that equal opportunities during the hiring process and through career development and promotion will help staff develop to their best potential which is in the best interests of the company, staff and customers. We are committed to providing a working environment where everyone is treated with equality, dignity and respect, free from harassment, victimisation, bullying and discrimination.

As a UK employer Marlowe is required to comply with the Equality Act 2010. Our policy has been aligned with International Labour Organisations (ILO) standards, including ILO CI00, ILO CIII, ILO C156 and ILO C190.

Discrimination

Marlowe seeks to remove all forms of discrimination from our working practices and will take all allegations of discrimination seriously. Forms of unlawful discrimination include, but are not limited to:

- **Direct discrimination:** Treating a person less favourably on the grounds of a protected characteristic;
- **Discrimination by perception:** Discrimination against someone because others think they possess a particular characteristic;
- **Discrimination by association:** Direct discrimination against a person who is associated with a person with a protected characteristic, for example carers to disabled people and the elderly;
- **Indirect discrimination:** Having a rule or practice which is applied to all, which is unfair to a group of individuals;
- **Bullying and harassment:** Unwanted or offensive behaviour to affect the dignity of an individual, including verbal/physical gesturing, jokes and content containing inappropriate comments or images.

Marlowe will not tolerate any acts of unlawful discrimination committed against any employee, contractor, customer, supplier, applicant or visitor because of a protected characteristic, including but not limited to:

- Gender
- Race, colour and/or ethnic origin
- Nationality and/or country of origin
- Background (Social, Economic, Cultural and Geographical)
- Religion and/or beliefs
- Sexual Orientation
- Family Responsibilities (including pregnancy, maternity/paternity, and duties of care)
- Disability
- Political opinion/affiliation
- Age
- Sensitive medical conditions
- Trade Union membership/non-membership
- Gender reassignment
- Marriage or Civil Partnership status

Diversity and Equal Opportunities

Marlowe recognises the benefits of increased diversity, and it is the policy of the Group that fair and equal opportunities for training, career development and promotion are available to all. The group will ensure that entry to, and progression within the group is based solely on aptitude. Necessary steps will be taken to ensure that the views of all groups are considered as an integral part of our processes, and reasonable adjustments to allow for recruitment in a way which is not discriminatory may be provided.

Speaking up

If an employee has any concerns or wishes to make a complaint or report a violation of this Policy or any Group or local policies, then they should report the matter as soon as possible in accordance with the Whistleblowing Policy.

Allegations will be investigated and if confirmed, will be escalated to the appropriate authority. In more serious cases actions may require formal disciplinary procedures which may require involvement with the Police or Court.

Marlowe strongly supports a culture of speaking up and is committed to non-retaliation against those who make a report concerning actual or suspected breaches of this policy.

The policy has been approved by the board of directors of Marlowe PLC on 20th March 2025.