

## 1 Purpose

Bluesource is committed to encouraging equality, diversity, and inclusion among our workforce. We aim to eliminate unlawful discrimination and create an environment where every employee feels respected and able to contribute their best. This policy applies to all employees, whether temporary, part-time, or full-time.

The aim is for our workforce to be truly representative of all sections of society and our customers, and in providing goods and/or services, committed against unlawful discrimination of customers or the public.

We also aim to engage partners and suppliers who have similar commitments.

## 2 Protected characteristics

We will not unlawfully discriminate based on the following protected characteristics under the Equality Act 2010:

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

## 3 Unlawful discrimination

Oppose and avoid all forms of unlawful discrimination in:

- ☒ pay and benefits
- ☒ terms and conditions of employment
- ☒ dealing with grievances and discipline
- ☒ dismissal
- ☒ redundancy
- ☒ leave for parents
- ☒ requests for flexible working
- ☒ selection for employment, promotion, training or other development opportunities.

## 4 Commitment

Bluesource commits to:

1. Encourage equality, diversity, and inclusion in the workplace as they are good practice and make business sense.
2. Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity, and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination.

All staff should understand they, as well the company, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

3. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others during the company's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.









4. Make opportunities for training, development, and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Make decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
7. Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this equality, diversity and inclusion policy.

Monitoring may also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, where applicable, are working in practice, reviewing them annually, and considering and taking action to address any issue

## 5 Responsibilities









### 5.1 Management Responsibilities

Bluesource expects its management team and a line managers:

-  To actively support equity, diversity and inclusion, so that all colleagues feel valued, engaged and respected
-  To ensure that the decisions you make affecting employment, training, promotion, reward and career development are based only on an individual's skills, talents and ability
-  To engage with your colleagues to create an inclusive working environment and ensure that everyone is familiar with the policy and aware of their responsibilities
-  To proactively address any inappropriate behaviour, including taking formal disciplinary action where necessary
-  To ensure yourself and your team members complete any relevant ED&I training
-  To be an advocate of diversity and inclusion
-  To create a safe environment in which members of your team feel confident and able to speak up and raise concerns where necessary
-  To support relevant reasonable adjustments to accommodate colleagues' needs.

### 5.2 Employee Responsibilities

All employees, as a colleague and member of the team, are expected:

-  To familiarise yourself with this policy and to act in accordance with our commitment to equity, diversity and inclusion always
-  To work in partnership to create an inclusive environment in which everyone's contributions are valued
-  To respect the rights of all your colleagues in an environment that is free from discrimination or harassment
-  To proactively challenge inappropriate behavior and report breaches of this policy to your line manager or to Human Resources
-  To be an advocate of diversity and inclusion both within the business and with clients and candidates
-  To conduct themselves to help provide equal opportunities in employment.
-  To prevent bullying, harassment, victimization, and unlawful discrimination.
-  To understand that they, as well as the employer, can be held liable for discriminatory acts.

## 6 Raising issues and Whistle Blowing

Concerns relating to equality, diversity and inclusion should be brought to Bluesource's attention and may be made anonymously and confidentially.

If you feel that you are, or have been discriminated against, harassed, or victimised you should raise the matter in complete confidence with Human Resources.

The Company takes complaints seriously and deal with them accordingly.

## 7 Our disciplinary and grievance procedures

Details of the Company's grievance and disciplinary policies and procedures can be found in the Employee Handbook (available on the Company's Intranet for employees). This includes with whom an employee should raise a grievance – usually their line manager and/or Human Resources.

The use of the Company's grievance or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within 3 months of the alleged discrimination.

## 8 Monitoring

Bluesource reserves the right to monitor, record and disclose all data and communications created, sent, received, or stored using Bluesource resources as it deems appropriate, subject to applicable laws and regulations. This includes all communications created by, sent to, received, or stored by the Supplier relating to Bluesource or Bluesource's customers.

Any employee found to be in breach of this policy and not upholding bluesource's values, may be subject to the company's disciplinary proceedings.

Bluesource will endeavor to work with its Suppliers to ensure they are compliant and where necessary, review any identified corrective action plans. Where non-compliance is identified, Bluesource expects the Supplier to work with its respective relationship manager/business contact at Bluesource to act quickly and implement appropriate corrective actions. Where compliance is unable to be achieved by the Supplier, Bluesource reserves the right to suspend and/or terminate any supply agreements, and without notice.

## 9 Reporting

At present Bluesource is not required to gather data and report on EDI. It does however capture the following data for its employees, which can be anonymized by Human Resources and reported against:


- ☒ Employee gender
- ☒ Employee age
- ☒ Employee nationality (based on passport)

The following categories of information, mostly of which are classed as protected characteristics under the Equality Act 2010 and classed as sensitive personally identifiable information ("PII") under data protection legislation, are not captured by the Company and therefore not reportable, even in an anonymized form:

- ☒ Disability
- ☒ Gender reassignment
- ☒ Marriage and civil partnership
- ☒ Parental status
- ☒ Race (color, ethnic or national origin)
- ☒ Religion or belief
- ☒ Sexual orientation
- ☒ Trade union membership

As a future enhancement, the Company is looking to be able to provide basic anonymized gender pay data and to be able to report on such areas as the gender pay gap, etc.

## 10 Sign Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	19 March 2025

## 11 Revision History

Revision Date	Reviser	Description of Revision
22/03/2024	Nick Jagers	Policy created and published.
19/03/2025	Nik Jagers	No changes required.