

## Equality Diversity & Inclusion Policy

### Introduction

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Grainger is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. We want individuals to bring their whole selves to work and create an environment where everyone is given the opportunity to thrive. We value our people for the differences they bring and encourage diversity, which supports our inclusive culture at Grainger.

### Purpose

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The purpose of this policy is to help create a great working environment. One that promotes dignity and respect as an inclusive workplace where individual differences and contribution of all colleagues are recognised, and is free of bullying, harassment, victimisation and unlawful discrimination. This policy is also aligned with The Equality Act 2010.

To support our inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of our colleagues in support of this commitment;
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle; and
- identifies forms of discrimination and behaviour which this policy aims to address, which are not tolerated and unacceptable within Grainger.

This policy does not form part of any contract of employment, and we may amend or withdraw it at any time.

### Scope

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This policy applies to anyone working for Grainger. This includes employed colleagues, workers, contractors, volunteers, interns and apprentices. This policy also relates to job applicants and is relevant to all stages of the employment relationship.

The policy supports our company values and accompanies our Equal Opportunity Policy and our other equality, diversity and inclusion (EDI) policies that we have adopted. These can be found in The Employee Handbook. The Definitions can be found in Appendix A.

### Our commitment to you

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We believe that a culture of equality, diversity and inclusion benefits our organisation, the communities we serve and our customers. Our commitment to ED&I fosters a culture which puts People at the Heart and enables our colleagues to work better because they can be themselves and feel that they belong.

We ensure that all our policies, procedures and processes do not treat people less favourably because of (but not limited to) their:

- Age

- Disability
- Gender reassignment status
- Marital status or civil partnership
- Pregnancy or maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Social mobility
- Caring responsibilities;
- Employment status (part-time status; or fixed-term).

Our ED&I commitment to you is supported by our core purpose and each of our four Grainger values and the importance of creating a culture of inclusivity, respect and where individual characteristics are valued.

This policy sets out the different forms of discrimination, harassment, sexual harassment, victimisation, bullying and our approach at Grainger.

## Discrimination

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We do not tolerate any form of discrimination.

Discrimination can be direct or indirect and can include harassment and it can occur intentionally or unintentionally.

- Direct discrimination - less favourable treatment directly because of a protected characteristic
- Indirect discrimination - when colleagues are treated the same but those with a protected characteristic are put at a disadvantage compared to others

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering colleagues into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other colleagues or clients; and
- using different standards for different groups of colleagues to judge performance.

The Equality Act 2010 prohibits discrimination because of certain protected characteristics: disability; sex; gender reassignment; marital or civil partnership status; race; religion or belief; sexual orientation; age; and pregnancy/maternity.

## Harassment and Sexual Harassment

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Harassment is unwanted and unacceptable conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or

- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment can be defined as:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our Equal Opportunity Policy for further information on our procedure for reporting harassment.

## Victimisation

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Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

## Bullying

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There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, an abuse or misuse of power or displaying behaviours of a 'cancel culture'. It is usually persistent, and has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our Equal Opportunity Policy for further information on our procedure for reporting bullying.

## Our Equality, Diversity and Inclusion Network

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We are proud to have an Equality, Diversity & Inclusion (ED&I) Network to provide a forum for colleagues who have a passion for, or a connection with, a particular aspect of equality, diversity and inclusion; all colleagues are welcome to be part of our network. This supports the creation of a sense of belonging.

We have an ED&I steering committee which is made up of Executive Committee members and is chaired by our Chief Financial Officer.

The objective of this Network is to:

- help drive a culture at Grainger which embraces equality, diversity and inclusion;

- raise awareness by communicating key ED&I priorities, supporting training initiatives and sharing best practice;
- increase engagement by organising events throughout the year;
- act as ambassadors for ED&I; and
- support Grainger's leadership to achieve our strategic ED&I goals, including the ED&I Governance and Strategic Framework.

Grainger was awarded the National Equality Standard (NES) accreditation in 2024 – a recognition of our commitment to Diversity and our leading practices that support our commitment.

## Equality of Opportunity

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### Recruitment

In order to attract the best talent to Grainger, we take reasonable and appropriate steps to encourage job applications from a diverse range of candidates, which is underpinned by our recruitment policy.

### Learning & Development and Career Progression

We take reasonable and appropriate steps relating to a colleague's promotion or career development to ensure that any decision must be free from discrimination.

All new starters complete ED&I Training; and colleagues undertake annual refresher ED&I training, with additional, subject specific ED&I training taking place on a range of subjects, supported by the ED&I Steering Committee and ED&I Network.

All training across the business is delivered in accordance with this policy.

### Performance Management

We have a well-defined approach to Performance Management and support colleagues to be at their best with Performance Development Reviews taking place with all colleagues at Grainger. We seek to have a high performing culture, and our performance management processes area based on managing and supporting talent. We are committed to ensure that all forms of performance management are free from bias, discrimination, bullying or harassment.

### Reasonable Adjustments

We ensure reasonable adjustments are implemented and monitored in accordance with our Workplace Accessibility and Adjustments Policy to ensure we support employees where we can.

## What Grainger expects from you

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We expect you, and every one of our colleagues, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility that we all share.

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect maintaining

our People at the Heart value. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute; this supports our inclusive environment and approach to listening to ensure every colleague has a voice.

By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our colleagues are found to have 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, under our Disciplinary Procedure.

You should be aware that you can be personally liable for discrimination and harassment.

## Monitoring and Review

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We analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equality, diversity and inclusion strategy.

## Data Protection

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Grainger processes personal data collected in relation to diversity and inclusion in accordance with our data protection policy and wider data protection regulations. This data is held securely. The data collected will be deleted in compliance with our retention and deletion procedures.

Inappropriate access or disclosure of employee data constitutes a data breach and must be reported immediately in accordance with Grainger's data protection policy. It may, depending on the circumstances, also constitute a disciplinary offence, which will be dealt with under this disciplinary policy.

## APPENDIX 1

### Definitions

The below definitions are in the context of the workplace.

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Diversity - the ability of organisations to attract and retain talent with diverse backgrounds, views, and approaches.

Equality - the foundation where everyone employed by, or seeking employment with, an organisation has equality of opportunity.

Inclusion - when organisations actively involve staff in participating in the activities and decisions that shape the organisation

Prejudice - a preconceived judgment or attitude towards others, often without awareness or control. This can be caused by unconscious bias.

Protected Characteristic - a specific attributes safeguarded against discrimination under the Equality Act 2010. These include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Unconscious bias - the purposeful or accidental assumptions or social stereotyping regarding groups of people that individuals develop without conscious awareness.