



## DIVERSITY & INCLUSION POLICY

### What is our Diversity Statement?

We are committed to promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. As part of our zero-tolerance approach to discrimination in any form, you and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation ("Protected Characteristics").

This applies equally to the treatment of our visitors, customers, contractors, suppliers and ex-employees.

We would like our workforce to reflect our community and everyone to achieve their full potential. The diversity principle applies to every stage of the employment lifecycle including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

### What is meant by discrimination?

The following forms of discrimination are prohibited under the Equality Act 2010 and under this policy:

- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a Protected Characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a Protected Characteristic.
- (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater

childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- (c) **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.
- (e) **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### What do I have to do?

All workers have a duty:

- to act in accordance with this policy
- to treat colleagues, visitors, clients and others they interact with, with dignity and respect at all times,
- not discriminate against or harass another colleague or person.

All our line managers have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to this policy.

### How does this apply to recruitment and selection?

We will take the following steps to ensure that no job applicant receives less favourable treatment in the recruitment process on any of the unlawful grounds listed above:

- Our recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities
- Job selection criteria will be regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.
- Job adverts will be placed to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in our organisation. If appropriate, use may be made of lawful exemptions to recruit suitably qualified people to cater for the special needs of particular groups.

We will monitor to ensure that this policy is operating effectively and to identify those sections of the local community which may be under-represented in employment.

### What does this mean for staff training and promotion and conditions of service?

Our regular appraisals will identify staff training needs. All employees will be given appropriate access to training to enable them to progress within the organisation.

All promotion decisions will be made on the basis of merit.

The composition and movement of employees at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.

### Disability Discrimination

A disability is defined by the law as *"any physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out their normal day-to-day activities"*.

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible. You may also wish to advise your line manager of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job.

### Gender inclusion

To make our workplace more inclusive all staff are expected to comply with the following:

- A person's gender identity, name and pronouns must be respected;
- Gender assumptions should not be made, for example on the basis of appearance; and
- We encourage pronouns to be included on email signatures but we respect that some colleagues may not wish to do so.

Under the Gender Recognition Act 2004, a person can apply for legal recognition of their acquired gender through the issue of a gender recognition certificate (GRC). A person does not require a GRC to be protected from discrimination, harassment and victimisation under the Equality Act 2010. People should not be asked to produce a GRC as evidence of their legal gender.

It is a criminal offence to disclose without the person's consent information relating to a person's application for a GRC, or which identifies a person with a GRC as transgender, that has been obtained in an official capacity, such as through a recruitment process.

Bullying or harassment in connection with gender identity will be dealt with under our Anti-harassment and Bullying Policy, which may result in disciplinary action being taken against the perpetrator.

Misconduct because of gender identity will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate misconduct because of gender identity may amount to gross misconduct resulting in dismissal.

Non-exhaustive examples of misconduct prohibited by this policy include:

- Repeatedly calling someone by their previous name or incorrect pronouns.
- Refusing to recruit, work with, or promote someone, or provide them with training because of their gender identity, their perceived gender identity or because of the gender identity of someone they associate with.
- Asking someone if they have a gender recognition certificate (GRC).
- Disclosing confidential information about a person's gender history or gender reassignment without their consent.
- Verbal or written jokes or abuse on the basis of gender identity.
- Unwanted questioning about gender identity, gender history or transition.

### **How does it affect those employed on fixed-term and part time contracts?**

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

### **What if the policy is not followed?**

We will not tolerate any discriminatory behaviour.

If you believe that you may have been disadvantaged on any of the unlawful grounds listed above, you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been harassed on any of the unlawful grounds listed above, you are encouraged to raise the matter through our Anti-Harassment and Bullying Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who raise concerns in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

If, following investigation, you are found to have breached this policy by discriminating against or harassing another worker, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and may result in summary dismissal. We will always take a strict approach to serious breaches of this policy.

As this policy applies equally to interactions with visitors, clients, customers and suppliers, if you are found to have discriminated against or harassed a client or supplier, this may also result in disciplinary action.

### How will we monitor and revise this policy?

The Board has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the HR Director.

We will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated and we are committed to providing relevant training for all staff on their responsibilities and duties under this policy.

## **XMOS Gender Equality Plan and Diversity & Inclusion Framework**

Alongside meeting our legal obligations, XMOS is committed to taking proactive, proportionate steps to promote gender equality. This plan outlines how we will do this in practice.

This framework sits alongside our company-wide policies, including the Anti-Harassment and Anti-Bullying, Anti-Sexual Harassment, Grievance and Whistleblowing policies, and supports our commitment to a safe and inclusive culture. This Gender Equality Plan is approved by the XMOS leadership team and is publicly available on our website.

### **Leadership and Oversight**

XMOS's leadership team supports our commitment to inclusion and ensures these principles are reflected across our policies and day-to-day practices.

XMOS will promote fairness and transparency in leadership and decision-making structures, monitoring gender representation where data exists.

HR will coordinate activity in this area, provide guidance where needed, and review progress as part of our broader HR agenda. XMOS allocates dedicated HR time and organisational resources to the implementation, monitoring and reporting of this Gender Equality Plan.

### **Data and Insight**

XMOS will collect, monitor, and review gender data annually across recruitment, retention, remuneration, development and progression. Summary findings will be used to inform actions and improvements.

Insights will be used proportionately to support fair and evidence-based people decisions, recognising XMOS's size and available data.

Data collected in relation to pay will be used to monitor (and where appropriate, address) any gender pay gap.

### **Awareness and Training**

Relevant training will be available to employees to support inclusive behaviour, fair decision-making and respect in the workplace. This includes alignment with our Anti-Harassment and Anti-Sexual Harassment policies, where expectations and definitions are clearly outlined.

Training will include awareness of gender equality, unconscious bias, and inclusive behaviour.

Managers may receive additional guidance to help promote consistency and equity within their teams.

### **Inclusive Culture and Flexible Working**

XMOS supports flexible working where business needs allow and reviews practices to ensure they are inclusive and supportive at different life stages.

XMOS will encourage equal share of care responsibilities between men and women. This includes enabling men to work flexibly, so that it is not seen as only a benefit for women and encouraging fathers to take up paternity and shared parental leave.

Where relevant to our research and innovation activities, XMOS will consider the gender dimension in product design, testing and user experience to ensure inclusive and equitable outcomes.

### **Recruitment, Development and Progression**

XMOS is committed to fair and transparent recruitment and progression processes.

We will:

- review role profiles and adverts to ensure they are inclusive and free from bias
- encourage diverse representation in interviews where practical
- maintain clear criteria for hiring and promotion
- increase transparency to promotion, pay and reward processes
- support fair access to development opportunities
- promote gender-based representation in positions of responsibility and decision making.

### **Respectful and Safe Workplace**

XMOS maintains a zero-tolerance stance on harassment, bullying and discrimination. Our Anti-Harassment & Anti-Bullying, Anti-Sexual Harassment, Grievance and Whistleblowing policies outline how concerns can be raised and how they will be managed. All reports will be handled sensitively and addressed in line with our procedures.

All colleagues are expected to contribute to a positive working environment and to report concerns about inappropriate behaviour through HR or anonymously via SpeakOutXMOS.

### **Review and Continuous Improvement**

This framework will be reviewed periodically to ensure it reflects XMOS's values, culture and any relevant external expectations. As a smaller organisation, we will take a proportionate, practical approach focused on continuous improvement rather than formal targets.

Focus Area	Key Actions	Frequency
1. Policy Review & Alignment	Review People policies for inclusive language and accessibility. Consider whether policies adequately support different employee groups, including gender-specific needs (e.g., family leave, work-life balance).	Annually / as needed
2. Fair & Inclusive Recruitment	Review job descriptions and adverts to remove unintended bias, including gendered language. Maintain job-related, objective criteria for selection. Encourage diverse representation on interview panels where practical. Monitor recruitment trends, with periodic attention to gender representation across stages.	Annually
3. Workforce Understanding & Insight	Review available workforce data on recruitment, retention and progression, including gender where data exists. Identify any emerging patterns or barriers, even if anecdotal. Use insights proportionately to inform future improvements.	Annually
4. Awareness & Capability Building	Maintain access to training on equality and inclusive behaviour. Reinforce expectations in Anti-Harassment and Anti-Sexual Harassment policies. Provide managers with practical guidance on avoiding bias, including bias related to gender and other characteristics.	Ongoing
5. Inclusive Culture & Working Practices	Promote flexible working where business needs allow, supporting work-life balance for all genders.	Ongoing

This Gender Equality Plan has been reviewed and approved by XMOS.

**Signed:**



**Mark Lippett**  
CEO

**Date: 17/12/2026**