

**COU-POL-015**  
**EQUALITY, DIVERSITY, AND INCLUSION POLICY**

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**Introduction**

This policy applies to all employees and potential employees of Cousins Ltd and its subsidiaries (Cousins Ltd, and Campbell Smith & Co Ltd) and the Policy will be communicated to all employees and potential employees. It addresses our compliance with relevant legislation, specifically the Equality Act 2010, the Equal Pay Act 1970, the Employment Rights Act 1996, and the GDPR Regulations 2016.

Cousins Ltd, recognising the need to achieve equality of opportunity has formulated this policy which is designed to ensure the optimum use of human resources and to bring about equality in any matters affecting the employment, selection, promotion, or training of its employees or its potential employees.

**Implementation**

Cousins Ltd, as the employer, has the ultimate responsibility for ensuring the effective implementation of the Policy and provides training to staff induction and other relevant methods.

However, all Managers and Supervisors of group companies are responsible for ensuring the effective implementation of the Policy. It is also the responsibility of all employees and any trade unions that represent them to co-operate in working to achieve the objectives of the Policy.

**Objectives**

The overall objectives of the Policy are:

- To prevent direct and indirect discrimination, including slavery.
- To encourage equality of opportunity for all protected groups by the adoption and development of good employment practices and procedures.
- To achieve a workforce that reflects the overall composition of the community Cousins Limited is seeking to serve.

The specific objectives of Cousins Ltd are: -

- To ensure that job selection criteria are objective and are designed to recruit the best person for the job irrespective of age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, or sexual orientation.
- To ensure that all employees receive the training they require to develop their skills, irrespective of their age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, or sexual orientation.
- To ensure that training is given to the appropriate employees so that they can meet the objectives of the Policy.
- To provide conditions and facilities which will give employees and potential employees equal opportunity e.g.: special facilities for the disabled where necessary, flexitime working.

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**Responsibilities**

The primary responsibility for providing equal opportunity rests with the employer, but all employees have a responsibility not to discriminate against any groups or individuals. Failure to comply with this Policy will be dealt with in the framework of Cousins Limited's Disciplinary Procedures.

**Monitoring**

The effectiveness of this Policy in achieving its objectives is monitored and regularly reviewed by the Senior Management of Cousins Ltd.

**Grievances**

- a) Any employee who has a grievance arising from this Policy should raise it through the MIR-PR-5106 Grievance Procedure.
- b) Any potential employee who feels they have a grievance relating to recruitment and selection should contact the Manager who will be responsible for investigating the matter.
- c) a) and b) above do not take away the rights of any person to make a complaint directly to the Equal Opportunity Commission or the Commission for Radical Equality or pursue their case in some other way such as the Industrial Tribunal.



T Wilkinson  
**Group Operations Director**

22/01/2026