

DIVERSITY, EQUITY AND INCLUSION **POLICY**

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1. Policy principles

Davies values diversity of thought and the benefits that a diverse workforce brings to the business. We are committed to creating and maintaining an environment that embraces diversity and inclusion and where everyone is treated equitably. The company will not discriminate on the grounds of any differentiating factor including age, disability, gender reassignment, marriage and civil partnership, race, including colour, nationality and ethnic or national origins, religion or belief, gender, sexual orientation, body shape or neurodiversity.

Davies seeks to create an environment where;

- Everyone is **respected** and **valued** for who they are.
- People's **differences** are embraced as **strengths**.
- We promote **purpose** and **well-being**.
- We ignite **awareness** and **understanding** through **education** and **communication**.

Our commitments that underpin these guiding principles are;

- We will take measures to ensure there is an inclusive and welcoming working environment with zero tolerance to unlawful and unfair discrimination or treatment and where everyone can achieve their potential.
- To reflect and promote this in our policies, procedures and working practices.
- We will ensure there is suitable provision of advice, information and training to support and educate our employees and anyone working on behalf of the company to achieve an equitable, diverse and inclusive working environment and to understand all legislative and regulatory obligations.
- In all dealings with others, including our clients and third parties, we will look to promote the principles of equality, diversity and inclusion and expect all employees and others working on behalf of the company to not only comply with the principles of the policy but take personal responsibility for the promotion and advancement of it.
- To ensure appropriate action is taken when a reported act or behaviour is proven and for everyone to be taken seriously if a formal or informal complaint of discrimination is raised with regard to behaviour or a working practice.

2. Scope

2.1 What is covered under the policy?

This policy sets out how the company will fulfil its obligations and commitments in relation to diversity, equity and inclusion; including what other policies and procedures are in place to achieve this, what monitoring takes place and how you can raise concerns if you believe a current policy, procedure or working practice has the potential for bias or where you have witnessed or been subject to discriminatory behaviour or behaviour that falls short of the policy principles.

The policy is written in accordance with all relevant legislation, including the Equality Act 2010 and the Northern Ireland Act 1998, along with any other relevant legislation, regulations and/or codes of conduct in force that the company is bound to comply with.

The policy is non-contractual and is subject to change without notice as a result of planned or ad-hoc reviews. It may also be necessary for Davies to vary parts of the procedure contained within it depending on the circumstances.

2.2 Who does the policy apply to?

This policy applies to all UK and Republic of Ireland employees and includes partners, agency workers and self-employed contractors. The policy also applies to all our professional dealings with clients and third parties.

Everyone is personally responsible for the promotion and advancement of this policy. Behaviours, actions or words that fall short of the policy principles will not be tolerated in any circumstances and will be dealt with in line with our dispute resolution policy.

Any queries regarding the policy should be discussed with your line manager or a member of the HR team in the first instance. Please note that where the term “line manager” is used this refers to the person you directly report to.

2.3 What are mine and others roles and responsibilities under the policy?

Employees and all other workers are asked to:

- Read this policy and comply with the principles, guidance and their obligations detailed within it.
- To respect the dignity of all colleagues/co-workers and consider the impact their actions and or behaviour may have on other people.
- To raise a concern if you believe a working practice or policy causes bias or discrimination.
- To speak up if you have a concern or believe an individual has been unfairly discriminated against.

Line Managers are expected to:

- Understand the policy as well as their individual and collective responsibilities and comply with all principles, guidance and their obligations detailed within this policy.
- Promote the principles of the policy within their teams as appropriate.
- Investigate and take action in relation to any non-compliance or potential breaches of the policy.

HR will:

- Provide advice and guidance as appropriate on the policy, its interpretation and application.
- Ensure all relevant legislation, along with all other internal policies, procedures and practices comply with this policy.
- Provide appropriate mandatory training in relation to the policy for all employees and other workers.

3. Types of discrimination

3.1 What groups can be subject to discrimination?

The Equality Act 2010 requires equal treatment for everyone, regardless of protected characteristics. There are nine protected characteristics currently defined by the Act:



3.2 What forms of discrimination are there?

- **Direct discrimination;** where a person is treated less favourably on the grounds of a protected characteristic;
- **Indirect discrimination;** where an apparently neutral provision, criterion or practice would put a substantially higher proportion of those with a protected characteristic at a particular disadvantage compared with other persons, unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;

- **Victimisation;** where someone is treated less favourably than others because they have taken action against the Company under the Equality Act 2010;
- **Harassment;** when unwanted conduct related to any of the grounds referred to takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. This will include physical, verbal and non-verbal communications or gestures;
- **Associative discrimination;** where a person is directly discriminated against on the grounds that they are associated with another person who possesses a protected characteristic;
- **Discrimination by perception;** where a person is directly discriminated against and they do not possess a protected characteristic, but they are discriminated against on the grounds that others believe that they possess a particular protected characteristic.

For the avoidance of doubt, we will not permit or tolerate any form of discrimination.

4. Promotion of Diversity, Equity and Inclusion

4.1 How does the company promote and ensure the policy principles and commitments are enforced?

We are committed to promoting diversity and equity across all parts of the company as well as in those areas where we have influence.

Any acts of discrimination or harassment by colleagues and/or a failure to comply with the principles of the policy will result in disciplinary action.

In all dealings, including those with other colleagues, clients and third party suppliers, we will look to promote the principles of equality, diversity and inclusion and expect everyone to not only comply with the principles of the policy but take responsibility for the promotion and advancement of it.

We will also work in conjunction with our ESG Board Committee that is responsible for overseeing DEI initiatives, to further develop an inclusive and diverse workplace where everyone feels valued, respected, understood and are assured of equal treatment. Our work is supported by our four current Employee Resource Groups (ERGs); LGBTQ+, My Culture & Heritage, Working Families and Caregivers and Supporting our Health and Wellbeing. In 2024 we launch two new ERGs, Women's Network and Eco Davies. Our ERGs are run by their members with support from the business and their aim is to foster a culture of inclusion by supporting our population through awareness (via the provision of education and communication), celebration (through engagement and events) and change (to support the needs of our diverse workforce).

5. Terms and conditions of employment

5.1 How does the company ensure fairness and equality in respect of our employment terms?

Terms and conditions of employment and all working arrangements, procedures and practices

will comply with the relevant equality legislation and will not discriminate on the grounds of any protected characteristic.

This is achieved through:

- Appropriate arrangements for recruitment and selection;
- Provision of equitable terms and conditions of employment including salary, hours and place of work;
- Availability of benefits including all forms of family leave;
- Application of bonus schemes;
- Appropriate allocation of work load/ targets;
- Application of performance review processes;
- Open access to promotion and internal transfer opportunities;
- Providing access to training opportunities for all;
- Applying appropriate criteria for demotions/ selection for redundancies;
- Providing appropriate grievance and disciplinary processes;
- Adopting an appropriate dress code; and
- Regularly reviewing any other employment related activities.

Where appropriate and necessary, we will look to provide appropriate terms and conditions of service and facilities which take into account the specific needs of our people which arise as a result of any protected characteristic. If you feel adjustments are required within your role please speak to your Line Manager in the first instance who will liaise with Health & Safety and/or HR as appropriate.

6. Recruitment and selection

6.1 How does the company ensure fairness and equality in its recruitment and selection processes?

We recognise the benefits and value of having a diverse workforce and will take steps to ensure that:

- We look to recruit from the widest pool of suitable candidates possible;
- Employment opportunities are open and accessible to all on the basis of their skills, knowledge and experience;
- Where appropriate, positive measures are taken to attract applicants from all sections of society and especially from those groups which are under-represented in the workforce;
- Our selection criteria and recruitment processes do not discriminate on the grounds of any protected characteristic other than in those instances where we are exercising permitted positive action;
- Wherever appropriate and necessary, lawful exemptions (genuine operational requirements) will be used to recruit suitable staff to meet the special needs of particular groups; and
- All recruitment agencies working on our behalf are aware of our requirement not to discriminate and act accordingly.

7. Career development

7.1 How does the company ensure we all have fair and equal career development opportunities?

We are committed to ensuring that all employees have equal access to training and other career development opportunities that are appropriate to their experience and abilities

Promotion throughout the company will be made with regard to merit and other appropriate business related criteria and without reference to any protected characteristic.

Our selection criteria and processes for promotions will be kept under review to ensure that there is no discriminatory impact on any particular group of people.

8. Delivery of service

8.1 How does the company ensure its professional dealings with other parties are fair and equitable?

In all dealings with others, including our clients and third parties, we will look to promote the principles of equity, diversity and inclusion.

Clients - we are generally free to decide whether to accept instructions from any client and will refuse to act where doing so would be in breach of relevant legislation. We will also take steps to meet the different needs of particular clients arising from our obligations under relevant legislation, regulations and professional codes of conduct.

Counsel - specifically relating to our provision of legal services; counsel should be instructed on the basis of their skills, experience and ability. We will not avoid briefing counsel or request counsel clerks to avoid briefing counsel on the grounds of possession of a protected characteristic. Client requests for named counsel should be complied with (subject to our duties in instructing third parties under the SRA Code of Conduct 2019) in so far as such requests are due to the client's approved panel counsel and not due to the possession of a protected characteristic.

Suppliers - third party suppliers are only instructed based [on](#) the ability of those persons or organisations to undertake work of a particular type. Instructions to Third Party Suppliers will not be discriminatory nor exclude a Third Party Supplier based on a protected characteristic.

9. Handling complaints

9.1 How do I raise a complaint if I believe I have witnessed or been subject to discriminatory behaviour or actions by another colleague?

Any complaints of discrimination, victimisation or harassment will be treated seriously. Anyone wishing to raise a complaint should do so via the processes set out in our grievance policy.

Complaints made about another colleague will be investigated under the relevant provisions of the grievance and/or disciplinary procedures by an appropriate manager in conjunction with HR.

9.2 How do I raise a complaint if I believe I have witnessed or been subject to discriminatory behaviour or actions by a client or third party?

Any complaints made about the behaviour or actions of clients, counsel or other third parties will be referred to Risk and Compliance in the first instance for guidance on the relevant complaints handling procedure to follow.

All third parties will be advised of our complaints handling procedure and that any complaint of discrimination will be dealt with in accordance with this procedure.

10. Monitoring Equity, Inclusion and Diversity

10.1 Does the company undertake any reviews to monitor compliance with the principles of the policy?

Monitoring will be conducted to ensure that our employees are not being discriminated against in terms of the opportunities or benefits available to them. However, we are aware that some employees may choose not to disclose certain information, and care should be taken to avoid inadvertent discrimination in such cases.

We will, as appropriate, monitor and record:

- The gender, age, disability and ethnic composition of employees and partners, and at different levels of the company;
- The ethnicity, gender and disability of all applicants for promotion, training opportunities and details of whether they were successful;
- Where it is possible to do so, and where doing so will not cause offence or discomfort to those whom it is intended to protect, the sexual orientation and religion or belief of employees and partners;
- The ethnicity, age, gender and disability of all applicants, short-listed applicants and successful applicants for employment contracts, including apprenticeships and training contracts; and
- The number and outcome of complaints of discrimination made by employees, partners, agency workers, contractors, counsel, clients and other third parties.

11. Additional guidance

Where you need advice or guidance on any of the provisions in this policy, you can speak with your Line Manager or with a member of the HR team. You can also speak to any of the DEI action group sponsors or champions for guidance, support or to provide feedback. You may also find the below useful sources of information and guidance.

Other relevant policies and procedures	Dispute resolution- grievance and disciplinary policies Recruitment and retention policy Learning and development policy Whistleblowing policy Trans equality policy Health & Well-being hub
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