

EQUITY, DIVERSITY & INCLUSION POLICY

Policy: Equity, Diversity and Inclusion

Valid as of: January 2026

Released by: People & Development

Next review: January 2027

Reviewed and issued annually

KAEFER is committed to promoting equity, diversity and inclusion (EDI) in all aspects of our business. This policy sets out our commitment to prevent discrimination, to value difference, and to create a workplace and supply-chain culture where everyone can contribute, belong, and thrive in our offices, at our owned facilities and on client sites across the UK & Ireland.

Aligned with one of our core values – respect – we strive to maintain a workplace free from discrimination, harassment, or bullying, where everyone feels empowered to reach their full potential. Our success depends on the talents, skills, and abilities of our workforce.

This policy applies to:

- All employees (permanent, fixed-term, temporary), contractors, agency workers, trainees, and apprentices.
- All individuals interacting with KAEFER, including job applicants, clients, visitors, and suppliers.
- All premises and working environments: KAEFER offices, owned facilities, client sites, and digital/remote settings.

KAEFER will comply with applicable equality and anti-discrimination law in the jurisdictions we operate in, including the UK Equality Act 2010 and the Employment Equality Acts in Ireland, and will follow guidance from relevant bodies.

The following protected characteristics are covered under UK law: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

This policy should be read in conjunction with the KAEFER Equality, Diversity & Inclusion Procedure. 051.

- **Equality** – ensuring individuals or groups are not treated less favourably because of protected characteristics.
- **Equity** – ensuring fair treatment, access, opportunities, and support for all individuals by identifying and removing barriers that disadvantage certain groups.
- **Diversity** – recognising, respecting and valuing differences (visible and non-visible).
- **Inclusion** – creating a culture where everyone feels respected, valued and able to contribute.

KAEFER will:

- Provide equal opportunities in recruitment, development, promotion and pay for all employees and applicants.
- Prevent and respond promptly to discrimination, harassment or victimisation.
- Make reasonable adjustments for employees with disabilities and support mental wellbeing.
- Where possible, embed EDI into procurement, subcontractor selection and client engagement.
- Provide EDI awareness training for all employees.
- Monitor workforce diversity and internally publish anonymised EDI metrics to drive continuous improvement.

The Director of People & Development, with support from the Head of ESG, holds responsibility for EDI strategy and policies, allocating resources and monitoring performance. The Chief Executive Officer oversees implementation and supervision.

All employees and individuals interacting with KAEFER must behave consistently with this policy, complete required training, and report concerns. Failure to adhere to this policy may lead to disciplinary action under the company's procedures.

- **Recruitment & selection** – job adverts and descriptions will use inclusive language and focus on recruiting for behaviours, potential and according to the KAEFER Values as well as any job specific requirements.
- **Training & awareness** – training records and uptake will be monitored.
- **Harassment, bullying & complaints** – all complaints will be taken seriously, investigated confidentially and without victimisation. Employees may raise concerns informally with their line manager or HR. Formal complaints follow our grievance procedure 058. Records of investigations will be kept securely and access restricted. Support will be offered to complainants (e.g. access to occupational health and/or the Employee Assistance Programme)
- **Reasonable adjustments & accessibility** – accessibility considerations will be included during the recruitment and onboarding process, and as and when arising.
- **Procurement & subcontractor expectations** – where practicable, contracts and tenders will include EDI expectations. Subcontractors must comply with this policy while undertaking KAEFER managed works.
- **Monitoring, data & reporting** – we will collect anonymised data to inform the business. Data collection will be voluntary, confidential and GDPR compliant.

The Director of People & Development will review the policy annually. Progress will be reported to the ESG committee. The policy will be revised sooner if legislation or best practise changes internally.

Reviewed and issued by Laura Bowes (Director of People & Development) January 2026. Next review January 2027.