



Equality, Diversity And Inclusion Policy.

Introduction

Our business is made up of brilliant individuals and each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. We value our people for the differences they bring to Cove and these differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all and being happy at work is at the heart of being a team member at Cove and Cove being an employer of choice.

To support this inclusive culture, we have two key values of Trustworthiness (we consistently do the right thing) and Kindness (we follow the golden rule), and this policy helps by:

- outlining 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 team in support of this commitment; and
- 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 for everyone.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to anyone working with us and includes all team members, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy accompanies our other policies of Anti- Bribery and Anti- Corruption, Bullying and Harassment, as well as Recruitment and selection.

Our Commitment to You

We believe that a culture of equality, diversity and inclusion not only benefits our Mission, Vision and Values but supports the wellbeing of our team and enables our team to work better because they can be themselves and feel that they belong. This in turn helps and supports our team to deliver the very best customer experience to our guests every day.

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We are committed to promoting a working environment based on trust, dignity and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion and retention procedures do not treat team less favourably because of their:

- disabilities (including hidden disabilities such as neurological and mental health conditions).
- gender, gender identity or gender reassignment status.
- marital status.
- race, racial group, ethnic or national origin, or nationality.
- religion or belief.
- sexual orientation.
- age.
- civil partnership status.
- pregnancy or maternity.
- paternity.
- educational background.
- socio-economic background.
- part-time status.

What We Expect from You

We expect you, and every one of our team, 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.

Delivering this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded.

We expect you to treat your fellow team members, every guest, owner and third parties individual (including suppliers, contractors, agency team and consultants) fairly and with trust, dignity and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

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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 team, guest, owners or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

If any of our team following an investigation are found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them.

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

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics, and these are:

- disability.
- sex.
- gender reassignment.
- marital or civil partnership status.
- race.
- religion or belief.
- sexual orientation.
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception. This means that an individual can feel discriminated against even if they do not personally have a protected characteristic but is related to someone who does, example a mother and a gay daughter, or if they just believe discrimination is taking place.

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments" if you have a need to make adjustments then speak with Human Resources or Health and Safety to ensure this takes place.

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

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"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 team 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 team members or guests; and
- using different standards for different groups of teams to judge performance.

Different types of discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled, and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts team with a particular protected characteristic at a disadvantage, compared with team who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a new requirement for all team to finish work at 6pm. It is arguable that female team, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
 - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
 - disciplining someone for losing their temper where such a loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:**

Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at

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a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:

allocating some of the disabled person's duties to another team member;

changing their working hours or place of work.

adjusting procedures for assessing job candidates.

modifying disciplinary and grievance procedures.

providing a special phone for those with a hearing disability.

Harassment and Sexual Harassment

Harassment is unwanted 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 is:

- 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 Bullying and Harassment Policy for further information on our procedure for reporting harassment.

Victimisation

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

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

Bullying can be physical or mental, inappropriate 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 of the work environment.

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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 Bullying and Harassment Policy for further information on our procedure for reporting bullying.

Our Equality, Diversity and Inclusion Framework

We are proud to have our Mental First Aiders providing a support group for team who have a passion for, or a connection with, a particular aspect of equality, diversity and inclusion.

The aim of this support group is to:

- provide networking opportunities and community support.
- organise events to raise awareness and provide education; and
- contribute ideas and suggestions for ways the organisation can be more diverse and inclusive.

The group will support for the following:

- mental health.
- disability.
- faith.
- ethnicity.
- carers.
- gender.
- LGBTQ+.

The Support Group can be those who are not personally affected but are prepared to speak up for under-represented groups by calling out and challenging unconscious bias, as well as challenging non-inclusive working practices.

We provide our Support Group with regular training and networking events to help them in their role. If you are interested in joining the network, please contact Antony Smith in Culture and Development or Peter Budd in Human Resources.

Equality of Opportunity

Recruitment and Selection

We take reasonable and appropriate steps to encourage job applications from as many diverse backgrounds as possible. Anyone deciding about recruitment must not discriminate in any way and must have attended Cove Recruitment and Selection training before any involvement in recruiting or selecting new Cove team.

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Every decision-maker should challenge themselves, and other members of the recruitment and selection team, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in our recruitment decisions.

Career Development

Any decision you make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and individuals' appraisals are reviewed on a regular basis so that there is no discriminatory impact on a certain group. We continue to improve the diversity of our workforce, for example:

- attending career workshops in schools in local areas.
- offering work placements/internships to people living in local areas.
- working with charities, schools, colleges and universities that support disability and the underrepresented groups in the workplace.
- running a return-to-work programme for those returning from family-related or disability-related long-term leave.

Disability Inclusion

Recruiting people with a disability

As a leader you should consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible. If you are not sure, then please contact the Human Resources team who will support you.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview/adapting psychometric tests/replacing psychometric tests with an alternative option/providing an alternative to a telephone interview for a deaf candidate/providing a suitable chair for an interview with a candidate suffering from back problems are just a few examples to think about.

If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from Peter Budd or one of the Human Resources team. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

Talking About Disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

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Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion. However, this is only possible if we treat people with trust, dignity and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will act against you including implementing the disciplinary procedure.

Reasonable Adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please in the first instance speak to your manager and if they cannot help you resolve the issue then speak to Human Resources to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with our Health and Safety team, you and your medical adviser to help us get the right support in place.

For team who are returning from long-term disability-related absence, we have a return-to-work interview in place to support what needs to be put in place which is different for each individual team member.

Support

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme which is a free, confidential advice line for all team. This can be done via their website healthassuredeap.com or phone 0800 028 0199 or by using MyHealthyAdvantage app code MHA204828. Details on how to access this service are also on the team hub.

We also encourage team speak with our Mental Health First Aiders, or to our Pathfinder Inclusion Network who can speak with team with similar experiences, and they can let you know who the other team are who have also experience of disability and who understand the associated workplace challenges. This group of Pathfinders make their voice heard and make a difference by helping raise disability awareness and understanding across the wider organisation.

Accessibility

If you experience accessibility issues due to your disability, for example because of aspects of our premises or because you do not have adaptive equipment to help you perform your role, please in the first instance speak to your manager who will discuss options or contact Health and Safety or Human Resources for support.

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Training

If you are involved with making decisions about a person's employment, you must attend appropriate equality, diversity and inclusion training. All new starters will receive some equality, diversity and inclusion training as part of their onboarding programme. Every current employee must attend regular equality, diversity and inclusion training on at least on a bi-annual basis.

We expect all our team to proactively support our equality, diversity and inclusion initiatives by attending events and workshops organised by the management or Pathfinders to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

Monitoring and Review

We will be analysing 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.

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