



EQUALITY, DIVERSITY &
INCLUSION STRATEGY
2025 - 2028

Introduction

Founded on the principles of delivering a high-quality service to our clients, the Greentown Companies strive to promote equality of opportunities to all their employees. We are proud to create an environment that attracts a wide and diverse range of individuals across all our services, and we ensure that they receive appropriate training and support to continue to develop and grow within our industries.

We want our employees to feel they are an integral part of the Greentown community and together we will strive to create an inclusive culture where everyone can contribute their views and to reach their full potential.



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Our Equality, Diversity, and Inclusion Vision

Greentown, with its range of Divisions and Services, relies on attracting and retaining individuals with a wide range of skills and experience and we work with these individuals to create an environment where, through working together, we share this knowledge and develop experiences. We have secured the Bronze Diversity Mark Charter Mark for Equality, Diversity and Inclusion and we will build on this success to further promote the equality of opportunity, working with strategic partners, including Women in Business, to ensure that this remains an important business objective.

Our commitment to Equality, Diversity, and Inclusion

We will work together to create a business culture where diversity is recognised, valued, and celebrated. We will proactively advance equality and inclusive practice in our recruitment and selection processes, in our day-to-day business, within the business environment, and in the careers we offer to our employees.

Our values and principles

As well as being integral to Greentown's strategic plan, our Equality, Diversity, and Inclusion Strategy is underpinned by the belief that equality, diversity, and inclusive practice enhances our Company culture as a whole.

To ensure this we will:

- demonstrate visible senior leadership on equality, diversity, and inclusion matters.
- ensure everyone understands their personal responsibility to promote equality and inclusive practice and remove any unfair barriers.
- align and embed the Strategy to all areas of the business agendas, including Operations; Human Resources; Marketing and social engagement.
- explore multi-layered experiences of disadvantage when addressing under-representation and barriers to achievement.
- engage and involve employees of all areas of the business and organisations within the locality to develop our equality, diversity, and inclusion initiatives.
- ensure that our objectives and actions are led by our own ambitions, with an understanding that the achievement of the Diversity Mark charter mark is a measure of success.

What we mean by

Equality	A fundamental part of a fair society in which everyone can have the best possible chance to succeed in life.
Diversity	Recognising that everyone is different in a variety of visible and non-visible ways, and that those differences are to be recognised, respected, and valued.
Inclusion	The active creation of a learning, working and social environment that is welcoming, which recognises and celebrates difference and is reflected in structures, practices, and attitudes.

Our workforce is made up of employees who are typically recruited locally to each Division. Many identities and experiences shape the diversity of our entire employee workforce including gender and gender identity; ethnicity; culture and nationality; sexual orientation; physical, learning, and mental health disabilities; having religious or other beliefs; age and combining career with caring responsibilities.

How will we make this happen?

In order to ensure that these key objectives are realised, we will implement and monitor detailed actions that will specify targets, timescales, and responsibilities. These actions will not be static but will be reported and reviewed annually by the Equality, Diversity, and Inclusion Committee to ensure they remain relevant.

Equality, Diversity, and Inclusion: Strategic Objectives

Objective 1

Embed equality in all aspects of Greentown Companies

We will be a Company that will lead by example; we will raise awareness and promote equality in a way that informs our culture and practices, is inclusive and removes any form of less favourable treatment or harassment.



We will do this by:

- Ensuring everyone understands their responsibilities to foster an inclusive learning, working and social environment and are aware of relevant good practice policies, guidance, and support services available.
- ensuring diversity is reflected in our decision-making bodies and committees, and that they actively contribute to promoting equality and inclusive practice.
- embedding structures and resources to support equality, diversity, and inclusion activity within each area of the business.

Objective 2

Attract, retain, and develop our diverse workforce.

We will attract, retain, and develop a diverse workforce and strive to ensure that everyone can attain and succeed to the best of their abilities.



We will do this by:

- proactively engaging and encouraging applications for roles where we know there is an under-representation at different levels; we will pursue this through our employment, career progression and leadership development opportunities.
- ensuring we engage and inspire candidates from diverse backgrounds to apply to Greentown, making sure our recruitment and selection processes are fair and inclusive.
- ensuring we monitor and address differences in appointments and employment opportunities for our diverse workforce and promote equality in participation and progression.

Equality, Diversity, and Inclusion: Strategic Objectives

Objective 3

Be flexible and adaptable to the needs of our diverse Workforce.

We will support flexible ways of working, ensuring excellence through inclusion.



We will do this by:

- ensuring an inclusive approach to our flexible working policies
- ensuring we embed inclusive practice to support research excellence.
- ensuring we promote equality and inclusion within all our working policies and practices.

Objective 4

Adopt an inclusive workplace approach.

We will provide an inclusive workplace for all employees which addresses the needs of our employees which is accessible, safe, and welcoming.



We will do this by:

- understanding the diverse composition and needs of our staff by creating an environment which encourages disclosure as well as collecting and analysing robust information.
- ensuring accessibility and inclusive practices to accommodate the needs of our staff and visitors when considering our current business and future developments.
- committing to promoting a culture based on the principles of respect, dignity, and inclusion for everyone.



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EQUALITY, DIVERSITY, EQUITY & INCLUSION POLICY

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1. Our commitment

- 1.1 Greentown Environmental Ltd and Greentown Traffic Management Ltd (together “the Company” or “We”) recognise the importance of affordable and sustainable service for our clients and the protection of the environment.

2. About this policy

- 2.1 This policy sets out our approach to equality, diversity, equity, and inclusion. Our aim is to encourage and support equality, diversity, equity, and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with us, organisation including recruitment, pay, benefits and conditions, flexible working and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 2.2 This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.
- 2.3 The HR Manager is responsible for this policy and will review it annually.
- 2.4 This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3. Diversity and inclusion training

- 3.1 Managers will be given appropriate training on recognising and avoiding discrimination, harassment, and victimisation, and promoting equality of opportunity and diversity in the areas of recruitment, development, and promotion. The HR Department has overall responsibility for equality training, for staff and managers as appropriate.
- 3.2 We will provide you with regular training to ensure that everyone is aware of and understands the contents of this policy. Following the training, you will be required to confirm that you have read, understand, and will comply with this policy.
- 3.3 All colleagues are expected to:
- Challenge unacceptable behaviours and create a climate where complaints can be raised without the fear of reprisal;
 - Take firm action where unfairness or inconsistency exists;
 - Encourage and support diversity within your teams;
 - Demonstrate and promote considerate and fair behaviour;
 - Treat colleagues with dignity and respect recognising and valuing individual skills and contributions;
 - Demonstrate through words and actions that diversity is an integral part of meeting the priorities of the Company;
 - Create an environment in which colleagues can identify and share good practice, celebrate successes, and encourage positive attitudes towards diversity; and
 - Comply fully with all legislation relating to equality and diversity.

4. Discrimination

- 4.1 You must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers, and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts or when wearing a work uniform), on work-related trips or events including social events or in your use of social media.
- 4.2 The following forms of discrimination are prohibited under this policy and are unlawful:
- (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.
- (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 worked on a full-time basis 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.



- (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.

5. Recruitment and selection

- 5.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Shortlisting and interviewing should be done by more than one person where possible. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.
- 5.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should, where possible, include a short policy statement on equal opportunities and the employer's commitment to equality, diversity, equity and inclusion in the workplace and state that a copy of this policy will be made available on request.
- 5.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 5.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.
- 5.1 We are required by law to ensure that all employees are entitled to work in the country that we conduct our business. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department.

6. Disabilities

- 6.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

7. Part-time and fixed-term work

- 7.1 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.

8. Breaches of this policy

- 8.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.
- 8.2 If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.
- 8.3 There must be no victimisation or retaliation against staff who complain about or report discrimination. If you believe you have been victimised for making a complaint or a report of discrimination or have witnessed it happening to someone else in the workplace, you should raise this through our Grievance Procedure.
- 8.4 We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that equality, diversity, equity, and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.