



Diversity, Equity and Inclusion Policy

What this policy covers

The Company recognises the benefits of a diverse and inclusive workforce and is committed to providing a working environment that is free from discrimination.

An inclusive work culture where people of different backgrounds are valued equally will ensure better outcomes for us all. We will engage with our employees as well as external partners to help us understand how we can make our workplace more inclusive and gain insight into what our employees need most from us.

The Company will seek to promote the principles of diversity, equity and inclusion (DEI) in all its dealings with employees, interns, job applicants, clients, customers, suppliers, contractors and the public.

All employees and those who act on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any guise.

Please note that this policy is a living document, and the Company is committed to continuously improving its DEI efforts and engagements to ensure that the Company's values and goals are reflected in its practices and culture.

Your entitlements and responsibilities

Everyone within the Company must fully understand and comprehend how this policy will affect them, and they must abide by the following when carrying out their duties. When working for or representing the Company, you must:

- Ensure that you are always presenting the best of yourself at work and supporting your colleagues so that we encourage an engaged, welcoming and committed workplace which realises the potential of all involved
- Understand the policies surrounding DEI in the capacity of your role and how they affect not only you but your fellow colleagues
- Be receptive and open to differences, and where appropriate, challenge your own thinking to ensure you do not fall foul of making assumptions about colleagues and/or customers who may be different to you
- Understand the full breadth and impact that discrimination of any kind can have on the Company, our customers and your colleagues
- Follow the appropriate channels to challenge behaviours that are not inclusive; and
- Ensure that the Company's DEI Policy is at the forefront of your mind in all internal and external interactions, in order to respect differences and ensure that you represent the Company in the correct light

Line managers

In addition, line managers must:

- establish inclusive values throughout their teams to ensure differences are being valued and inappropriate behaviour is being challenged swiftly
- take appropriate action where there is a clear breach of the Company's DEI Policy in order to discourage such behaviour and supply relevant training/coaching to encourage correct behaviours
- be a clear role model to the team they manage to demonstrate their own actions and behaviours are in line with those of the Company's inclusion commitment; and
- consider all steps to ensure inclusion is prevalent within every stage from induction to exiting, ensuring that all decisions taken are based completely on merit and that clear opportunities to develop skills and potential are available to all

Unlawful discrimination

Unlawful discrimination of any kind in the working environment will not be tolerated, and the Company will take all necessary action to prevent its occurrence.

Specifically, the Company aims to ensure that no employee or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation, or trade union membership. This commitment applies to all aspects of employment, including:

- Recruitment and selection, including advertisements, job descriptions, and interview and selection procedures
- Training
- Promotion and career development opportunities
- Terms and conditions of employment, and access to employment-related benefits and facilities
- Grievance handling and the application of disciplinary procedures
- Selection for redundancy

Equal opportunities practice is developing constantly as social attitudes and legislation change. The Company will review all policies and implement necessary changes where these could improve equality of opportunity.

Career and personal development

While positive measures may be considered to encourage under-represented groups to apply for employment opportunities (including internships and work experience), recruitment or promotion for all roles will be based solely on merit and skills/experience.

All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities.

Procedure

Complaints of discrimination

The Company will treat all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties seriously, and will take action where appropriate.

If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possible with your line manager or other senior employee using the Company's [Grievance Policy](#).

Allegations regarding potential breaches of the DEI policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's [Disciplinary Procedure Policy](#).

Investigating accusations of unlawful discrimination

If you are accused of unlawful discrimination, the Company will investigate the matter fully.

During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

If the investigation concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

Equal opportunities monitoring

The Company may carry out monitoring for the purposes of measuring the effectiveness of its DEI Policy.

Training and implementation

All employees are required to undertake online training focusing on the topic of DEI in the workplace. The Company takes an active interest in DEI, and has established a DEI Working Group, involving a representative and broad group of members (employees). This Working Group is responsible for supporting the Company Directors with DEI initiatives, in order to ensure a working environment that is free from discrimination, and enjoyable for all employees.

The Operations Manager and Directors have primary responsibility for this policy and its implementation.

Supplier Diversity Programme

Supplier diversity commitment

Helios is committed to promoting and actively increasing supplier diversity and creating opportunities for historically under-represented groups, including minority-, women-, LGBTQ+- and disabled-owned businesses, as well as small businesses. We aim to seek out and engage diverse suppliers to foster economic growth, innovation and social change.

The Company recognises that having a diverse supplier pool brings huge advantages to the organisation (both commercial and social), furthers our values and goals, and benefits society as whole.

Supplier diversity policy

The Company commits to ensuring that diverse suppliers will have an equal opportunity to work with us.

As detailed in our DEI Policy, the Company seeks to promote the principles of DEI in all its dealings with suppliers, as well as employees, interns, job applicants, clients, customers, contractors and the public.

Supplier code of conduct

The Company requires suppliers to adhere to our standards of DEI, which include anti-discrimination and other rights protected by law.

Procedure

- ***Responsibility and ownership***

The Company has specific team members who actively work on this programme and commit to ensuring that all areas of the organisation are included within this programme, by reporting, informing and educating.

- ***Supplier evaluation and selection***

The Company evaluates current and potential suppliers based on their commitment to DEI based upon diversity certification, diversity within the supplier's workforce, and their own DEI policies. We also actively seek procurement from small and medium-sized enterprises (SMEs), as these are recognised to increase DEI opportunities.

In addition, the Company aims to seek out and encourage diverse suppliers, ensuring they align with our values and goals.

- ***Reporting and tracking***

The Company tracks our supplier diversity through the percentage of total spending allocated to diverse suppliers and shares progress reports internally and externally to showcase the Company's commitment and impact.

- ***Evaluation and continuous improvement***

The Company aims to regularly evaluate the effectiveness of the supplier diversity programme, solicit feedback from diverse suppliers and identify areas for improvement to ensure ongoing progress and success.