
	Author	Director of HR	Document Ref	COS 17.0
	Title	<b>DIVERSITY, EQUALITY AND INCLUSION POLICY</b>		
	Date Created		Version	Review Date
	Responsibility	Infinis Energy Management Limited		

# Group policy

Revision	Date	Description	Prepared by	Approved by
	September 2025	Update	John Okninski	IEML Board

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## 1. POLICY STATEMENT

1.1 Infinis believes that everyone should be treated with dignity and respect both at work and in every way connected with its activities and values of diversity and inclusiveness in the workplace. The Company takes commitment to equality seriously and is committed to taking all reasonable and practicable steps to prevent all forms of harassment and ensure that its employees and other workers, job applicants, customers and suppliers are always treated fairly, regardless of disability, race, religion or belief, age, gender, gender reassignment, pregnancy/maternity, sexual orientation or marriage/civil partnership. Infinis employees or potential employees will not be disadvantaged by any conditions of employment or Company requirements which cannot be justified as necessary on operational grounds.

## 2. WHO IS COVERED BY THIS POLICY

2.1 Infinis expects all its employees to be aware of the importance the Company attaches to the Equality, Diversity and Inclusion Policy and employees should ensure that they do not discriminate unfairly by their actions or behaviour, directly or indirectly, intentionally or unintentionally. In addition, all Infinis' employees must ensure that they do not participate in behaviour which may constitute bullying or harassment, irrespective of the circumstances or individuals concerned. Infinis' employees should always show consideration for how others may react to their behaviour and actions/omissions - simply because an individual does not intend these to be intimidatory or discriminatory does not mean that the other individual does not find them so.


2.2 All Infinis employees are therefore reminded that the following rules and guidance refer to anyone on Infinis property, or encountered during business on Infinis' behalf:

1. There must be no discrimination on account of disability, race, religion or belief, age, gender, gender reassignment, pregnancy/maternity, sexual orientation, or marriage/civil partnership.
2. Inappropriate behaviour, which may be regarded as bullying or harassment will not be tolerated.
3. Infinis appoints, trains, develops and promotes on the basis of merit and ability.
4. Everyone has personal responsibility for the practical application of the Equality, Diversity and Inclusion Policy. This includes bringing any observed discriminatory, intimidatory or inappropriate behaviour to the attention of an appropriate manager.
5. Managers and supervisors involved in the recruitment, selection, promotion and training of employees have special responsibility for ensuring that the Equality, Diversity and Inclusion Policy is properly applied.
6. The Company requires that its suppliers and customers are treated in a manner consistent with this Policy and that they also treat others in a manner consistent with this Policy. Accordingly, if any employee feels that they have not been treated in a manner consistent with this policy by a customer or supplier they should bring it to the attention of an appropriate Infinis manager.
7. Employees must adhere to the standards of behaviour set out in Infinis' social media policy.
8. Infinis Grievance Procedure is available to any employee who believes that they may have been unfairly treated or subject to harassment.
9. Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination or act of harassment. In serious cases such behaviour is likely to be considered gross misconduct that could lead to summary dismissal.
10. Malicious and unfounded allegations of discriminatory or inappropriate conduct will also be subject to disciplinary proceedings against the complainant (an example might be where an employee complains of harassment by their manager when the manager gives the employee a reasonable instruction or holds a reasonable expectation of them which the employee resents).

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Author:

Authorised By:

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11. An Infinis employee wishing to disclose any concerns under this policy anonymously can use the confidential and anonymous whistleblowing hotline service, contact details of which are set out below and in the Company's Whistleblowing policy.

**3. RAISING A DISCRIMINATION CONCERN**

3.1 Infinis recognises the sensitive nature of complaints of discrimination, and the courage sometimes required to raise them. Any investigations will be handled as confidentially as possible with only the necessary parties involved. Infinis reserves the right to separate the complainant and whoever the complaint is made against should this be necessary during any period of investigation (and, if appropriate, subsequently), including suspension from work. Suspension does not indicate that there is any presumption of 'guilt' against any individual or that there has even been an offence which might be worthy of further attention.

**4. RESONSIBILITY FOR THIS POLICY**

4.1 The Chief Executive Officer has ultimate day to day responsibility for the implementation of this policy and delegates line management responsibility requiring commitment from all employees, consultants and contractors. If an individual has any questions, doubts or concerns about this Policy or its application they should consult their manager or, if not appropriate, their manager's manager or the Human Resources Department.

4.2 The Board reviews this policy annually and updates it as required, monitoring its implementation on an ongoing basis.



Bruce Heppenstall  
Chief Executive Officer

**Confidential and anonymous  
Whistleblowing hotline**

<http://infinis.ethicspoint.com/>  
0800 0488404