



JUSTICE, EQUITY, DIVERSITY & INCLUSION (JEDI) AT 3KEEL

Mission Statement

3Keel lives up to its values of being friendly, curious, practical and ambitious. We try to offer an exceptional and fulfilling working experience to all our staff, underpinned by a generous employee value proposition.

We are committed to offering equal opportunities and to being an inclusive organisation with equality built into its norms, practices and policies, and where a diverse mix of talented people join, stay and deliver their best work. We recognise that a diverse workforce will ensure that 3Keel will make better and more balanced business decisions and drive innovative solutions.

We strive towards being a just, equitable, diverse and inclusive place of work. We recognise the benefits which this brings to company performance and staff wellbeing and the benefits it brings to tackling the sustainability challenges we exist to solve.

What does JEDI mean?

Justice means actively dismantling systemic barriers and oppressive structures that cause inequality. It is the moral rightness of creating a society or organisation where disparities are addressed and people can have fair treatment and full participation. This goes beyond simply treating everyone the same; it involves repairing past harms and ensuring fairness in areas like policies, procedures, and treatment.

Diversity refers to the presence and appreciation of a wide range of human differences. Rather than focusing only on visible characteristics, JEDI emphasises that diversity encompasses both seen and unseen differences.

Equity is the principle of providing people with the specific resources and opportunities they need to achieve fair outcomes. Equity recognises that individuals and groups have different circumstances and face different systemic barriers and therefore require different support to reach an equal playing field. Everyone has a right not to be treated less favourably because of their characteristics, of which those seen as protected by the Equality Act are:

- Age
- Disability
- Gender transition/expression
- Marriage, civil partnership
- Pregnancy and maternity
- Race
- Religion or belief system
- Sex
- Sexual orientation

Inclusion is the practice of creating an environment where every individual feels welcomed, respected, supported, and valued. While diversity focuses on the presence of different backgrounds and identities, inclusion is about ensuring that these diverse individuals can fully participate and have their voices heard.

Business benefits of JEDI

- Diverse teams help performance. Broader, more balanced and inclusive dialogue and interactions lead to better engagement, innovation and productivity.
- Diverse and inclusive teams, where staff feel they belong, help reduce staff turnover and absenteeism rates.
- Working with diverse teams improves customer satisfaction - there are a broader range of team members to relate to or connect with.
- A diverse and inclusive company will in turn attract a larger pool of talent.
- Diverse teams contribute to increased psychological safety and inclusion, again improving engagement and innovation.
- A commitment to JEDI builds trust and reputation.

Why the sustainability sector needs diverse workforces

It is important for 3Keel to play our part in increasing diversity within the sustainability sector, recognising that there is some way to go. The climate and biodiversity crises demand creative, tailored solutions that will best come from the contributions of people from as wide a range of backgrounds, experiences and ideas as possible to achieve real innovation for our clients and audiences around the world. After all, the climate and other environmental crises are happening to all of us, not just some. We take our role in contributing to change in this area seriously.

JEDI Policy

This policy does not form part of the employees' contract of employment. 3Keel may change this policy from time to time and you will be notified of any such changes.

This policy must be read in conjunction with our Harassment, Sexual Harassment, Bullying and Victimisation Policy, Grievance Policy and Whistle Blowing Policy.

Scope

This policy applies to all employees. For the avoidance of doubt, all positions detailed below are included:

- Directors
- Senior Managers
- Employees (Home workers, Permanent, fixed-term and temporary, casual seasonal workers)
- Consultants/Analysts
- Core Services staff
- Sub-contractors/Freelancers
- Trainee/Apprentices/Interns
- Seconded employees
- Third party employees working on 3Keel's behalf

All the above-mentioned employees and anyone performing services on or on behalf of 3Keel must comply with this policy. Failure to comply with any aspect may result in disciplinary action up to and including termination or possibly criminal offences.

Our Commitments

1. Non Discrimination Commitment

3Keel is wholeheartedly committed to being an Equal Opportunities Employer. We are committed to offering equal opportunities and to creating a workplace where a diverse mix of talented people join, stay and deliver their best work. In promoting this policy, 3Keel aims to fulfil its social responsibility towards its employees and communities in which it operates. It also recognises its legal obligations under the Equality Act 2010 and any other relevant legislation or employment guidelines.

All employees and applicants for employment shall be given equal opportunities in all areas of employment. 3Keel will not impose any condition or requirement in relation to any job that cannot be justified as being necessary for the proper performance of the job. No individual will receive less favourable treatment on grounds (or association with or perception of) age, race/ethnicity, sex, religion/belief system, sexual orientation, disability (which may include individuals who are neurodiverse or who suffer from long term mental ill health), maternity/pregnancy, marital/civil partnership and gender expression or transition (in the case of gender reassignment/transition: whether proposing to undergo, is undergoing or has undergone the process).

3Keel will, where appropriate, take positive action to bring better balance to its team and practices in line with its JEDI measures and principles. In line with ACAS guidance, positive action

refers to voluntary measures employers can take to help and encourage people who share a protected characteristic to overcome disadvantages in the workplace - or gain access to the organisation, via recruitment or hiring.

We emphasise that discrimination in the workplace is unacceptable and will be treated as a disciplinary offence. 3Keel will not tolerate any form of unlawful discrimination at work or at work-related social functions. Individual employees, as well as 3Keel, can be liable to pay damages if they are found to have discriminated against another employee or applicant. They may also be subject to disciplinary action. Intentional unlawful discrimination is gross misconduct.

Contractors and agency staff undertaking work for 3Keel are expected to associate the principles of this policy with their own responsibilities in terms of their contractual obligations and the service they provide. Discriminatory or abusive behaviour by customers, visitors or staff is not tolerated and decisive action will be taken to protect employees.

Great emphasis is placed on maintaining procedures, which are free from all forms of discrimination.

2. Equitable recruitment/hiring

We will ensure that:

- All applicants for employment with 3Keel are treated equally and with respect. No unjustifiable conditions should be imposed in relation to any job and adverts must not suggest that 3Keel has any intention of unlawfully discriminating against applicants
- Language used in job adverts is inclusive
- Where reasonable and practical, we promote our external roles with the aim of attracting a more diverse range of applicants
- We place an emphasis on supporting apprentices and those from non-traditional backgrounds to join the company
- Recruitment processes are standardised for fairness
- Interview panels are as diverse as is practical
- Adjustments are made to recruitment processes where reasonable
- In any selection process, the ability to perform the job is paramount
- Managers taking decisions at any stage of recruitment, promotion, training etc keep a written record of their reasons for decisions.
- Records are retained for six months.

3. Equal pay

We will ensure that:

- We commit to fair compensation by regularly reviewing pay data across demographic groups to identify and close any unjust pay gaps.
- All pay/remuneration structures are available to employees.

4. Equitable development/promotion

We will ensure that:

- Our performance management process is fair, transparent, enabling and psychologically safe.
- Our career progression information makes it clear how individuals can develop and progress.
- Our promotion process is conducted every year and is democratic and fair.
- Our learning and development processes and opportunities are accessible to all.
- Opportunity for staff promotion and training is be open to all and based purely on merit.

5. Policy, procedure and process

We will ensure that the application of 3Keels terms and conditions of employment, policies and procedures and particularly the disciplinary and grievance procedures are consistent, fair and transparent.

6. Gathering data, action plan and measurement/evaluation

We will ensure that:

- We gather appropriate data on our staff and job applicants to better understand their needs and characteristics and to be able to report on JEDI progress.
- We identify an action plan and Key Performance Indicators to enable evaluation and reporting on our JEDI activities and progress over time.

7. Inclusion of diverse perspectives

We will ensure that:

- We provide training and tools to help all employees to foster respectful communication and inclusive behaviour.
- The format of our collective and wider team gatherings and meetings is inclusive, invites participation and a wide range of perspectives and ideas.
- We invite 'external voices in' where we feel they are missing.

8. Disability

We will ensure that:

- We comply with our obligations and duties under the disability legislation.
- Support is given to disabled staff and job applicants with the aim (amongst other things) of enabling disabled staff and job applicants to realise and achieve their potential.
- Where employees have become disabled during their working life, 3Keel gives all reasonable assistance (having regard among other things to the company's size and resources), with rehabilitation, training and other measures of a similar nature.

9. Age

We will ensure that:

- Employees of all ages can work and make a meaningful contribution to 3Keel as a company which benefits from diversity.
- That no employee feels obliged to retire - there is no default retirement age and you can retire when you choose. 3Keel will provide a range of flexible working options to allow employees to contribute for as long as they wish.
- The company (at its discretion) provides a range of benefits to allow staff to plan for retirement.
- Younger staff are supported on their career journey, with salaries that are above National Living Wage levels, and a range of company benefits and policies to support their personal and professional development.

10. Pregnancy, Maternity, Paternity, Same Sex Parenting and Parenthood

We will ensure that:

- We provide above statutory and generous maternity and paternity leave and pay packages for all those expecting a baby, within the terms of our **Parental Policies**.
- We provide a range of flexible working options and wider range of leave types in order to support the continued contribution of parents who are juggling work and childcare responsibilities - either with a partner or alone.
- Where possible, we provide private space and other provisions for breastfeeding mothers at our workspaces.

11. Culture, race/ethnicity and religion

We will ensure that we:

- Encourage the celebration of diverse cultural and religious festivals and holidays.
- Provide flexible leave options to allow for the accommodation or observance of culturally important days. Show sensitivity towards those of all religions and backgrounds when planning social gatherings or similar.
- Take positive action where possible during recruitment and selection processes to increase the racial/ethnic diversity within our team, noting that ability to perform the job will be paramount.

12. Socio-economic background

We will ensure that we take positive action where possible (noting that ability to perform the job will be paramount) during recruitment and selection processes to increase the socio-economic and academic diversity within our team, acknowledging that the sustainability sector is typically and traditionally seen as 'white and middle class'.

13. Diverse working models

We will ensure that we provide flexible working arrangements to accommodate the needs of a diverse workforce, making use of remote, hybrid and flexible working models, as well as a broad range of leave types.

14. Employee Resource Groups (ERGs)

We will ensure that we work sensitively towards providing a supportive environment in which specific ERGs can develop and provide a forum for connection, input and support for employees with shared backgrounds

Definitions of forms of discrimination

- **Direct discrimination** - when someone is treated less favourably than another person because of a Protected Characteristic they have or are thought to have.
- **Discrimination by association** - direct discrimination against someone because they associate with another person who possesses a Protected Characteristic.
- **Perception discrimination** - direct discrimination against an individual because others think they possess a particular Protected Characteristic. It applies even if the person does not actually possess that characteristic.
- **Indirect discrimination** - indirect discrimination can occur when you have a condition, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a Protected Characteristic.
- **Disability discrimination** - 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.
- **Harassment** - unwanted conduct related to a relevant Protected Characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Sexual harassment is unwanted conduct of a sexual nature, which has the effect of harassment.
- **Retaliations** - (often called victimisation in UK law) is when an employer takes an adverse action against an employee for engaging in a legally protected activity. This can include reporting discrimination or harassment, participating in an investigation, or challenging unfair treatment. Retaliation is unlawful, and the adverse action is intended to punish or deter the employee.
- **Less favourable treatment** to an individual because they submit to or reject sexual harassment or harassment related to sex or gender reassignment
- **Victimisation** or treating someone badly because they have reported, wanted to report or because it is believed that they have done.

For further information on the following, please refer to the **Harassment, Sexual Harassment, Bullying and Victimisation Policy**.

Procedure in the case of discrimination

3Keel emphasises that discrimination in the workplace is unacceptable and will be treated as a disciplinary offence.

Any deliberate act of discrimination in the course of employment in breach of this policy or any other anti-discrimination policy introduced and implemented by 3Keel, will be regarded as a serious breach of conduct which may justify summary dismissal, depending on the circumstances and the subsequent investigation of the matter.

Discriminatory or abusive behaviour by customers, visitors or staff is not tolerated and decisive action will be taken to protect employees.

If an employee believes that they have been discriminated against, they should, if appropriate, raise the matter with their manager. In circumstances where this is not appropriate (for example where the employee wishes to complain about their manager), they should, ideally, take the matter to the next level or the People Team.

Recognising the sensitivity that is often involved in cases of this type and in addition to the Grievance Procedure, 3Keel has a specific Whistleblowing Policy and Harassment, Sexual Harassment, Bullying and Victimisation Policy. Employees should review these documents for the details of how they should communicate and escalate any complaint that they have.

Staff may, if they wish, disclose information anonymously by using the confidential [Incident Reporting Form](#). This is sent direct to the People Team.

Accountability and Oversight

- Managing Director - lead responsibility for the implementation of this policy rests with the Managing Director, with the support of the Head of People, who will ensure the policy is observed within their sphere of responsibility. The impact of this policy will be reviewed by the Managing Director (and Head of People) every three years or in line with changes to legislation, whichever is sooner.
- Managers - are responsible for ensuring that all employees are aware of their responsibilities under the policy and that it is implemented throughout their sphere of responsibility. They also have a responsibility under this policy to ensure that proper records of employment decisions are maintained for the appropriate period in line with best practice and GDPR.
- Employees (home workers, permanent, fixed-term and temporary, casual seasonal workers), consultants, sub-contractors/freelancers, trainees/apprentices, seconded employees - while the primary responsibility of providing equal opportunity for all is an organisational responsibility, we expect all employees to take responsibility for implementing this policy.