

Equality, Diversity & Inclusion (EDI) Policy

PURPOSE

Coffey is committed to equality of opportunity and to creating a working environment in which everyone is treated with dignity and respect. We will not tolerate unlawful discrimination, harassment, bullying or victimisation.

This parent policy sets the overarching standards for equality, diversity and inclusion across the full employment lifecycle, and links to the supporting sub policies on **Human Rights** and **Modern Slavery & Human Trafficking**.

SCOPE

This policy applies to anyone working for or on behalf of Coffey Group, including employees, workers, agency staff, contractors, consultants, interns, apprentices and volunteers. It also applies to job applicants, sub-contractors and suppliers and is relevant at all stages of the employment/contract relationship.

OUR COMMITMENT

Coffey will:

- Make employment decisions fairly, objectively and consistently, based on merit, capability and business need.
- Promote an inclusive culture where different perspectives are welcomed and everyone can contribute.
- Take reasonable steps to remove barriers to participation and ensure equality of access to opportunities.
- Address concerns promptly and appropriately and protect those who raise concerns in good faith.
- Take proactive preventative action, to ensure an inclusive environment for all

PROTECTED CHARACTERISTICS

Coffey will not unlawfully discriminate, harass or victimise any individual on the basis of any protected characteristic/ground recognised under applicable law in the jurisdiction where they work or are applying to work. Because Coffey operates across multiple jurisdictions, the statutory terms and protected categories may differ by location; however, Coffey's commitment applies to all legally protected categories and to promoting a respectful, inclusive workplace for everyone.

Non-exhaustive examples of protected characteristics/grounds (covering Ireland, Northern Ireland and Great Britain): age; disability; sex/gender; gender identity and/or gender reassignment; pregnancy, maternity and related family leave; marriage and civil partnership/civil status; family status; sexual orientation; race (including colour,

nationality, ethnic or national origin); religion or belief and/or political opinion, and membership of the Traveller community.

PROHIBITED CONDUCT

Discrimination can be intentional or unintentional and may be direct or indirect. It can also occur by association or by perception.

Coffey prohibits (non-exhaustive):

- **Direct discrimination** – less favourable treatment because of a protected characteristic.
- **Indirect discrimination** – a provision, criterion or practice that disadvantages a protected group and cannot be objectively justified.
- **Harassment** – unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation/Retaliation** – detrimental treatment because someone raised or supported a concern.
- **Failure to make reasonable adjustments** – where required, not taking reasonable steps to remove substantial disadvantage for a disabled person.

EXPECTATIONS AND RESPONSIBILITIES

Everyone:

- Treat colleagues and third parties (including customers, suppliers and contractors) fairly and with dignity and respect.
- Support inclusive ways of working and challenge inappropriate behaviour constructively.
- Cooperate with measures introduced by Coffey to promote equality.

Managers:

- Lead by example, communicate this policy, and apply it consistently.
- Ensure teams understand expected behaviours and know how to raise concerns.
- Consider reasonable adjustments and inclusive practices in decision-making.

HR / Leadership:

- Provide guidance, training and oversight.
- Monitor themes/risks and drive continuous improvement

Breaches of this policy may result in action under the relevant procedures (including disciplinary action, where applicable).

EQUALITY OF OPPORTUNITY IN PRACTICE

Coffey will strive to ensure fairness across:

- Recruitment and selection (objective criteria; inclusive processes)
- Training and development
- Promotion and career opportunities

- Pay, benefits and reward decisions
- Performance management
- Discipline and grievance processes
- Working arrangements (where feasible and appropriate)

REASONABLE ADJUSTMENTS

Where an individual has a disability, Coffey will consider and, where appropriate, implement reasonable adjustments to remove or reduce disadvantage. Colleagues are encouraged to speak with their line manager or HR to discuss support required. Coffey is committed to treating such requests as efficiently as possible.

RAISING CONCERNS

Any colleague who believes they have experienced or witnessed discrimination, harassment, bullying or a breach of this policy should raise the matter promptly. Concerns can be raised through:

- Line management; and/or
- Member of People & Culture (P&C) team; and/or
- Coffey's grievance or reporting channels (including whistleblowing routes where appropriate).

Concerns raised in good faith will be handled sensitively and without fear of retaliation.

MONITORING AND REVIEW

Coffey will monitor and review this policy regularly to ensure it remains effective, legally compliant and aligned with best practice. Coffey is also committed to monitoring employee experiences and as appropriate workforce data to identify barriers or disproportionate outcomes and to taking corrective action to address and \or prevent.

Reviews may also be triggered by organisational change, incident trends, audit findings or legislative updates.

LINKED SUB POLICIES (read in conjunction)

The following sub policies sit under this parent Equality policy:

- **Human Rights Policy** (Sub Policy A)
- **Modern Slavery & Human Trafficking Policy** (Sub Policy B)

Sub Policy A: Human Rights Policy

PURPOSE

Coffey is committed to respecting and supporting human rights in our operations and working practices. This sub policy explains how Coffey upholds human rights standards in the workplace and how concerns should be raised.

SCOPE

This policy applies to employees, contractors, suppliers and other third parties working for or on behalf of Coffey and is relevant to job applicants and workplace decisions.

OUR COMMITMENTS

Coffey will:

- Maintain a workplace free from discrimination, harassment, bullying and victimisation.
- Promote dignity, respect and fair treatment.
- Provide routes to raise concerns and ensure those concerns are addressed appropriately.

ROLES AND RESPONSIBILITIES

- **Managers** must support and communicate this policy and ensure colleagues understand expected behaviours.
- **All colleagues** must comply with this policy and the parent Equality policy.
- **Leadership/P&C** will provide guidance and oversee consistent application.

RAISING CONCERNS

Concerns relating to human rights or unfair treatment should be raised promptly through line management or a member of the People & Culture team. Where appropriate, concerns can also be raised via whistleblowing channels.

REVIEW

This policy will be reviewed regularly (at least annually) and updated where required.

Sub Policy B: Modern Slavery & Human Trafficking Policy

PURPOSE

Coffey recognises that modern slavery and human trafficking can occur in any industry and supply chain. Coffey has a **zero-tolerance approach** to slavery and human trafficking and is committed to taking steps to identify, prevent and mitigate risk in our operations and supply chain.

SCOPE

This policy applies to:

- All employees; and
- Contractors, consultants and agency staff; and
- Suppliers and subcontractors where Coffey can set expectations through procurement and contract management.

KEY PRINCIPLES

Coffey will:

- Act ethically and with integrity in our business relationships.
- Encourage reporting and protect people who raise concerns in good faith.
- Use proportionate controls and due diligence to reduce risk.

RESPONSIBILITIES

- **Leadership:** provides oversight and ensures appropriate controls are in place.
- **Managers:** remain alert to indicators of exploitation and escalate concerns.
- **Colleagues:** report concerns promptly.
- **Procurement/Contract owners:** apply supplier expectations and due diligence where relevant.

DUE DILIGENCE AND CONTROLS (Examples)

Coffey may use a combination of controls, appropriate to our operations and risk profile, including:

- Right to Work / identity checks and induction processes
- Clear contractual arrangements and payment practices
- Supplier onboarding questionnaires and periodic reconfirmation of commitments
- Contract clauses allowing action where modern slavery offences or serious concerns arise
- Training for relevant colleagues
- Periodic risk assessments of high-risk spend categories or supply chain tiers.

REPORTING CONCERNS

Concerns about suspected modern slavery or human trafficking must be reported immediately to a manager or HR. Where appropriate, concerns can also be raised through whistleblowing channels.

REVIEW AND PUBLICATION

This policy will be reviewed regularly and updated where required, including in response to legislative change and risk assessment outcomes.

GOVERNANCE (applies to the full suite)

Ownership and Accountability

- Overall accountability for this policy suite sits with Head of People and Culture.
- The People & Culture team supports implementation, training, monitoring and review.

Training and Communication

Coffey will communicate these policies through appropriate channels and provide training proportionate to role and risk.

RELATED DOCUMENTS

- **Business Ethics Policy:** CPY-GN-005

Signed: 
Odran Madden
CEO Coffey Group
Date: 13/04/2026