



Bluesource Equality, Diversity & Inclusion Policy

Last updated 31 March 2026

1 Purpose

Bluesource is committed to encouraging equality, diversity, and inclusion among our workforce, and to treating people with dignity and respect in line with the UN Global Compact's principles on human rights and labor. We aim to eliminate unlawful discrimination and create an environment where every employee feels respected and able to contribute their best. This policy applies to all employees, whether temporary, part-time, or full-time, and guides how we also work with agency workers, contractors, candidates, and other people working on our behalf.

The aim is for our workforce to be truly representative of all sections of society and our customers, and in providing goods and/or services, committed against unlawful discrimination of customers or the public.

We also aim to engage partners and suppliers who have similar commitments to equality, diversity and inclusion, including fair and respectful treatment, non-discrimination and appropriate steps to prevent harassment in the way they work with their own people and with Bluesource.

UN Global Compact (EDI-relevant principles) – what this policy covers

In line with the UN Global Compact Ten Principles, Bluesource commits to the following expectations across our business activities:

- Human Rights (Principles 1–2): treat people with dignity and respect, avoid discriminatory or harassing behavior, and address concerns promptly and fairly.
- Labor (Principle 6 – non-discrimination): provide equal opportunity and fair treatment, prevent bullying, harassment and victimisation, and make reasonable adjustments where required.

2 Scope

This policy applies to everyone working for or on behalf of Bluesource, including employees, temporary workers, agency workers, contractors, interns, and job applicants/candidates. It also sets expectations for how we work with clients, customers, suppliers and other business partners.

It applies to behavior in the workplace and in any work-related setting, including remote working, business travel, training, meetings, social events, and online/digital communications. It applies across the full employment lifecycle, including recruitment, onboarding, pay and reward, performance management, promotion, learning and development, and exit processes.

We do not tolerate harassment by third parties (for example, clients, suppliers or visitors) connected to our work

3 Definitions

- Company** shall refer to Bluesource
- Discrimination** is unfair treatment because of a protected characteristic (including direct and indirect discrimination).

- Harassment** is unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- Victimisation** is being treated badly because you raised (or supported) an EDI concern
- Bullying** may occur even where it is not linked to a protected characteristic.

4 Protected characteristics

We will not unlawfully discriminate based on the following protected characteristics under the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including color, nationality, and ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation.

5 Unlawful discrimination

Oppose and avoid all forms of unlawful discrimination in:

- pay and benefits
- terms and conditions of employment
- dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents
- requests for flexible working
- selection for employment, promotion, training or other development opportunities.

6 Commitment

Bluesource commits to:

- 1) Provide a workplace (and work-related settings) where everyone is treated with dignity and respect and feels included.
- 2) Prevent and address discrimination, harassment, bullying and victimisation, including from third parties connected to our work.
- 3) Make employment-related decisions fairly and based on merit, skills and business needs (subject to any lawful exceptions permitted under the Equality Act 2010).
- 4) Promote accessibility by removing barriers and providing reasonable adjustments, and by using inclusive communication and accessible formats where needed (for example, captions and alternative formats).
- 5) Build capability through awareness and training, and review our practices and this policy to support continuous improvement.

Everyone at Bluesource is responsible for supporting this commitment. Breaches of this policy may result in action under Bluesource's grievance or disciplinary procedures. Concerns can be raised as set out in Section 8, and Bluesource will not tolerate retaliation against anyone who raises a concern in good faith.

The following examples illustrate how this commitment may be put into practice:

- 🔘 **Recruitment & selection:** use clear role criteria, structured interviews, diverse shortlists where feasible, and remove non-essential barriers (for example, unnecessary degree requirements).
- 🔘 **Inclusive job adverts:** use inclusive language, state commitment to reasonable adjustments, and focus on skills and outcomes.
- 🔘 **Reasonable adjustments:** provide adjustments for interviews and work (for example, assistive technology, changes to working hours, adapting workspace, additional breaks, alternative formats).
- 🔘 **Flexible working & inclusivity:** consider flexible working requests fairly and consistently, and design roles and rotas to support different needs where possible.
- 🔘 **Inclusive meetings:** share agendas in advance, rotate who speaks first, invite quieter voices, avoid interrupting, and provide accessible meeting options (captions, dial-in, etc.).
- 🔘 **Everyday inclusive behaviour:** use preferred names/pronouns where shared, avoid stereotypes and assumptions, and challenge inappropriate comments respectfully.
- 🔘 **Learning & awareness:** complete EDI training, keep up to date with guidance, and support participation in awareness activities where appropriate.
- 🔘 **Safe reporting:** signpost how to raise concerns, respond promptly, maintain confidentiality where possible, and ensure no retaliation for speaking up.
- 🔘 **Working with clients, candidates and suppliers:** set expectations for respectful behaviour, do not tolerate discriminatory instructions (for example, requests for candidates of a particular protected characteristic), and escalate concerns.
- 🔘 **Data & privacy:** handle EDI-related information sensitively and in line with data protection requirements, collecting only what is necessary and explaining why.

7 Responsibilities

7.1 Management Responsibilities

Bluesource expects its management team and a line managers:

- 🔘 To actively support equity, diversity and inclusion, so that all colleagues feel valued, engaged and respected
- 🔘 To ensure that the decisions you make affecting employment, training, promotion, reward and career development are based only on an individual's skills, talents and ability
- 🔘 To engage with your colleagues to create an inclusive working environment and ensure that everyone is familiar with the policy and aware of their responsibilities
- 🔘 To proactively address any inappropriate behaviour, including taking formal disciplinary action where necessary
- 🔘 To ensure yourself and your team members complete any relevant EDI training
- 🔘 To be an advocate of diversity and inclusion
- 🔘 To create a safe environment in which members of your team feel confident and able to speak up and raise concerns where necessary
- 🔘 To support relevant reasonable adjustments to accommodate colleagues' needs.

7.2 Human Resources responsibilities

The Human Resources function within the Business is expected:

- 🔘 Maintain this policy and keep it under review, including updating it for changes in law and good practice.
- 🔘 Provide advice and guidance to managers and employees on EDI matters, reasonable adjustments and inclusive practices.
- 🔘 Receive and triage EDI concerns and support fair, timely and proportionate investigations and outcomes.

- Coordinate relevant training and awareness activities.
- Support EDI monitoring and reporting in line with data protection requirements, including anonymisation where appropriate.

7.3 Employee Responsibilities

All employees, as a colleague and member of the team, are expected:

- To familiarise yourself with this policy and to act in accordance with our commitment to equity, diversity and inclusion always
- To work in partnership to create an inclusive environment in which everyone's contributions are valued
- To respect the rights of all your colleagues in an environment that is free from discrimination or harassment
- To proactively challenge inappropriate behavior and report breaches of this policy to your line manager or to Human Resources
- To be an advocate of diversity and inclusion both within the business and with clients and candidates
- To conduct themselves to help provide equal opportunities in employment.
- To prevent bullying, harassment, victimization, and unlawful discrimination.
- To understand that they, as well as the employer, can be held liable for discriminatory acts.

8 Raising issues and Whistle Blowing (including third-party escalations)

Concerns relating to equality, diversity and inclusion (including discrimination, harassment, bullying or victimisation) should be brought to Bluesource's attention as soon as possible. Concerns may be raised confidentially, and where possible they may be raised anonymously.

How to raise a concern

You can raise concerns with:

- your line manager; or
- Human Resources; or
- another manager if your line manager is involved or you do not feel comfortable raising it with them.

Where appropriate, Bluesource may also provide an external speak-up route. If you feel in immediate danger or a criminal offence may have occurred, contact emergency services and notify HR as soon as it is safe to do so. Bluesource's Whistle Blowing process may also be used, as detailed in the company's [Employee Handbook](#).

What happens next:

We will acknowledge concerns promptly, assess the issue, and decide the most appropriate route (for example, informal resolution, the grievance process, the disciplinary process, or another procedure). Investigations will be handled as sensitively and impartially as possible, with information shared only on a need-to-know basis. Outcomes may include corrective action, support measures, training, and/or disciplinary action where appropriate.

Support

We will consider reasonable adjustments to enable people to raise concerns and participate in any process (for example, providing information in alternative formats, allowing a companion, or adjusting meeting times). Anyone involved may access wellbeing support available through Bluesource.

Non-retaliation and confidentiality

Bluesource prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation. Concerns will be handled as sensitively and confidentially as possible (on a need-to-know basis). Where a concern is substantiated, we will take appropriate corrective action.

Third-party escalation process (clients, suppliers, visitors)

If you experience or witness discrimination, harassment, bullying or victimisation by a third party connected to our work (for example, a client contact, supplier, contractor, visitor, or someone at a work-related event), or if a client gives an instruction that could be discriminatory (for example, requesting candidates of a particular protected characteristic), the following process should instead be adopted:

1. **Immediate safety first:** If anyone is at risk, remove yourself/others from the situation and seek help. If urgent or there is immediate danger, contact emergency services and notify HR as soon as it is safe.
2. **Set a clear boundary (where safe):** Calmly state that the behaviour/request is unacceptable and must stop, and that Bluesource expects respectful, non-discriminatory conduct.
3. **Record key facts:** Note what happened (date/time, location, people involved, what was said/done, any witnesses). Save relevant messages where appropriate and lawful.
4. **Report internally promptly:** Inform your line manager and HR. If the issue involves a client/supplier relationship, also inform the relevant account/relationship owner (or another manager if your line manager is involved).
5. **Protect and support affected people:** Consider immediate support measures (for example, changing meeting attendees, switching communication channels, providing a companion, checking welfare, and offering reasonable adjustments).
6. **Engage the third party:** The relationship owner (supported by HR) will address the issue with the third party, confirm expectations, and agree corrective actions (for example, apology, removal of the individual from the account, training, or changes to how meetings are conducted).
7. **Decision point – pause or disengage:** If the behaviour is severe, repeated, or not addressed, Bluesource may pause work, change points of contact, escalate to the third party's senior leadership, and/or end the relationship in line with contractual terms.
8. **Close out and learn:** HR will document the outcome, check for retaliation risks, and consider any improvements needed (for example, updating client brief templates, onboarding expectations, or training).

9 Our disciplinary and grievance procedures

Details of the Company's grievance and disciplinary policies and procedures can be found in the Employee Handbook (available on the Company's Intranet for employees). This includes with whom an employee should raise a grievance – usually their line manager and/or Human Resources.

The use of the Company's grievance or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within 3 months of the alleged discrimination.

10 Monitoring

Bluesource may monitor, record and disclose data and communications created, sent, received, or stored using Bluesource resources where it is necessary and proportionate for legitimate business purposes and permitted by applicable laws and regulations (including privacy and data protection requirements).

Any employee found to be in breach of this policy and not upholding bluesource's values, may be subject to the company's disciplinary proceedings.

Bluesource will endeavor to work with its Suppliers to ensure they are compliant with this policy and aligned to the UN Global Compact principles, including through proportionate due diligence, risk assessment and corrective action plans.

Where non-compliance is identified, Bluesource expects the Supplier to work with its respective relationship manager/business contact at Bluesource to act quickly, implement appropriate corrective actions and prevent recurrence. Where severe issues persist and improvement is not achieved within a reasonable timeframe, Bluesource reserves the right to suspend and/or terminate supply arrangements in line with contractual terms.

11 Reporting

To support continuous improvement and transparency, Bluesource will periodically review the effectiveness of this policy, track relevant EDI indicators (for example, training completion and trends in EDI-related concerns raised) and, where appropriate, communicate progress to stakeholders.

At present Bluesource is not required to gather data and report on EDI. It does, however, capture the following data for its employees, which can be anonymized by Human Resources and reported against:

- Employee gender
- Employee age
- Employee nationality (based on passport)

The following categories of information, mostly of which are classed as protected characteristics under the Equality Act 2010 and classed as sensitive personally identifiable information ("PII") under data protection legislation, are not captured by the Company and therefore not reportable, even in an anonymized form:

- Disability
- Gender reassignment
- Marriage and civil partnership
- Parental status
- Race (color, ethnic or national origin)
- Religion or belief
- Sexual orientation
- Trade union membership.

12 Related Policies


Breaches of this policy may result in action under the Company's grievance or disciplinary procedures. Details of those procedures are set out in the Employee Handbook.

13 Review

This policy is owned by the Head of Operations and Human Resources, and will be reviewed annually to ensure continued alignment with:

- UN Global Compact principles
- Current legislation
- Best practices in sustainability and responsible business conduct

14 Sign Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	31 March 2026

15 Revision History

Revision Date	Reviser	Description of Revision
22/03/2024	Nick Jagers	Policy created and published.
19/03/2025	Nick Jagers	No changes required.
31/03/2026	Nick Jagers	Aligned with UN Global Compact principles