

PUNCH

Diversity and Inclusion Policy 2026

Contents

1. Overview
2. Scope of the policy
3. Responsibility for the policy
4. Policy aims and principles
5. The legislative background
6. Types of unlawful discrimination
7. Customers, Suppliers and others not employed by Punch
8. Working environment
9. Complaints and grievance procedures
10. Monitoring and review

1. Overview

This policy outlines our commitment to an inclusive workplace where everyone feels respected, safe, and able to thrive.

Punch is committed to being an equal-opportunities employer and fostering an inclusive culture. We strive to ensure that everyone, regardless of sex (as defined in law), gender reassignment, disability, race, age, sexual orientation, religion or belief, marital/civil partnership status, pregnancy/maternity, or any other protected characteristic, is treated fairly and has the opportunity to reach their potential.

This policy ensures compliance with the Equality Act 2010 and recent legislative and judicial developments, including:

- New Employment Rights Act 2025
- The Supreme Court ruling confirming that “sex” refers to biological sex for the purposes of single-sex exceptions under the Equality Act 2010
- Strengthened protections relating to sexual harassment and employer duties to take all reasonable steps to prevent it

The People Team will provide advice and support relating to this policy.

2. Scope of the policy

This policy applies to:

- All employees: full-time, part-time, permanent, temporary, fixed-term
- Contractors, agency workers, consultants, and anyone carrying out work on behalf of Punch
- Job applicants and candidates throughout recruitment and selection

It covers all aspects of the employment relationship, including:

- Recruitment and selection
- Training & development
- Progression & promotion
- Probation & performance management
- Pay, benefits, & working arrangements
- Leave rights
- Discipline & grievance
- Dismissal (including redundancy)

3. Responsibility for the policy

Managers

- Uphold this policy and embed inclusive behaviours
- Ensure recruitment, performance and decision-making are bias-free
- Address inappropriate behaviour immediately
- Support reasonable adjustments for disability
- Implement new legal obligations, including:
 - day-one protection for certain types of leave
 - strengthened anti-harassment duties

Employees

- Treat colleagues, customers, and suppliers with dignity
- Report concerns, harassment, or discriminatory behaviour
- Cooperate with investigations and training

The Business

- Maintain policies and training reflecting statutory requirements
- Take reasonable and proportionate steps to prevent harassment
- Ensure facilities and workplace arrangements comply with EHRC guidance, including biological-sex-based facilities where required, with appropriate alternative options for trans employees (e.g., unisex or single-user spaces)

4. Aims and Principles

Punch aims to:

- Provide an inclusive and respectful working environment
- Ensure equal access to opportunities based on merit
- Prevent discrimination, harassment, victimisation, and bullying
- Support positive action where lawful
- Ensure compliance with changing UK employment law and equality case-law

Principles include:

- Zero tolerance for discriminatory behaviour
- Fair and bias-free processes
- Personal responsibility for inclusion
- Accountability where behaviour breaches standards

5. The legislative background

This policy reflects obligations under the Equality Act 2010 and the following recent developments:

Key updates incorporated:

- Definition of “sex” clarified as biological sex, affecting lawful single sex exceptions and access to facilities
- Employer duties to prevent sexual harassment strengthened, requiring all reasonable steps
- Restrictions on NDAs in harassment and discrimination cases
- Day-one rights for paternity leave and unpaid parental leave
- Strengthened whistleblowing protections for those reporting sexual harassment
- Changes to Statutory Sick Pay removing the Lower Earnings Limit and waiting days

Traditional anti-discrimination duties remain unchanged:

- No direct or indirect discrimination
- Duty to provide reasonable adjustments
- Protection from harassment and victimisation

6. Types of unlawful discrimination

Direct discrimination occurs where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ a woman because she was pregnant.

Indirect discrimination occurs where a provision, criterion or practice is applied and as such would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable and which is to the individual's detriment. An example of indirect sex discrimination could be requiring everyone to work full time unless there is a good reason, unrelated to sex, as to why the particular job has to be done on a full-time basis, since requiring everyone to work full time will normally adversely affect a higher proportion of women than men.

Victimisation occurs where someone is treated less favourably than others because he/she has alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Bullying can take many forms but is the result of misconduct through negative actions and practices. This involves the intentional intimidation or belittling of an individual or Groups of employees.

Failure to make reasonable adjustments occurs where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

Harassment occurs where there is unwanted conduct related to one of the prohibited grounds which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person (or is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her), even if this effect was not intended by the person responsible for the conduct.

7. Customers, Suppliers and others not employed by Punch

Punch will not unlawfully discriminate in the provision of goods or services and will take action where employees experience harassment from third parties.

8. Working environment

Punch commit to:

- A workplace free from harassment and bullying
- Lawful provision of single-sex facilities in line with updated legal definition of sex (biological) and EHRC guidance, while providing suitable alternative facilities for trans staff (e.g., unisex single-occupancy spaces)
- Appropriate adjustments for disability and other needs
- Inclusive practices reflecting diversity in our teams and customers

9. Working arrangements

Punch will provide flexible arrangements where operationally possible and ensure decisions are made without discrimination. This includes supporting staff with:

- Changing personal circumstances
- Disability adjustments
- Requests covered by expanded leave rights

10. Complaints and grievance procedures

Employees should report concerns to their Line Manager or The People Team. Complaints will be handled sensitively and fairly. NDAs will not be used to silence concerns relating to harassment or discrimination.

11. Monitoring and review

Punch will:

- Review this policy annually or following significant legal changes
- Review job descriptions, recruitment practices, and training materials for fairness
- Provide ongoing training on equal opportunities, harassment prevention, and inclusive leadership
- Ensure compliance with new legal duties (e.g., all reasonable steps to prevent harassment)