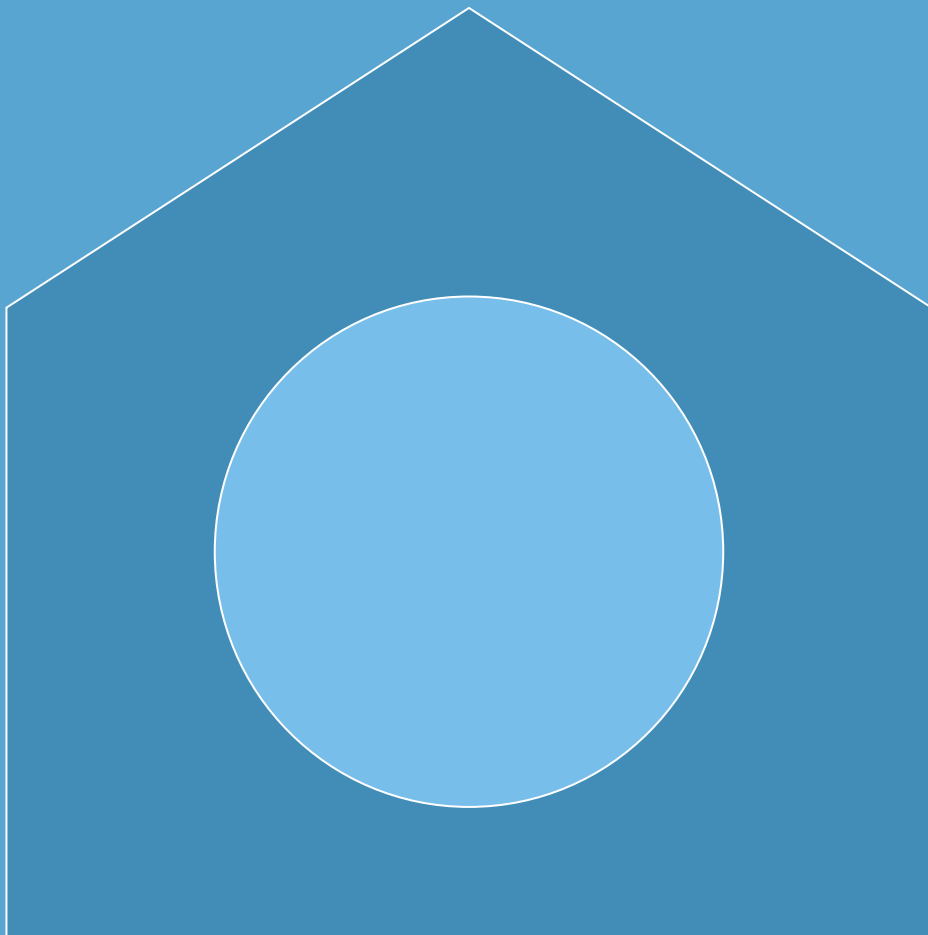


Cairn Homes plc
Equality Diversity & Inclusion Policy



Our purpose places “People” at the forefront, whether it is the people who buy or live in one of our homes, or those who have been involved in its development and build. The respect, welfare and safety of our extended workforce is fundamental to achieving our purpose and so we are committed to encouraging equality, diversity, and inclusion among that workforce, whilst eliminating unlawful discrimination.

Our Approach

By having a diverse and inclusive workforce, where everyone is treated equally and with respect, not only can Cairn achieve its purpose, but it can build an environment where diversity of views, perceptions, qualities, experiences, and contributions can better enable Cairn to meet its ambitions and goals, for everyone’s benefit. The principle of non-discrimination and equality of opportunity applies equally to the treatment of employees, workers, contractors, visitors, customers, partners, and suppliers by members of our extended workforce. This policy applies to all Cairn Homes plc and its subsidiaries (“**Cairn**” or the “**Group**”) directors, officers, employees, suppliers, and contractors.

Our aim is for our direct and extended workforce to be representative of all sections of society, and for anyone who works for or with Cairn to feel respected. This policy applies to all the business activities of Cairn. Any breach of this policy will give rise to disciplinary action, up to and including summary dismissal. This policy does not form part of any employee’s contract of employment, and we may amend it at any time. Cairn’s Leadership Team has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The objective of this policy is to ensure Cairn:

- Provides an inclusive working environment which respects diversity of characteristics including but not limited to sexual orientation, age, gender, sexual orientation, race, ethnicity, disability, civil status, personality, thinking style and religious beliefs;
- Formulates and implements policies and practices that value diversity, provide equality of opportunity, and ensure that no job applicant, employee, customer, or business associate receives less favourable treatment;
- Policies and practices reflect our commitment to treating people fairly, promoting an integrated way of working and respecting the dignity of employees at all times; and
- Avoids all forms of unlawful discrimination.

Non-discrimination policy

Cairn will not tolerate the unlawful discrimination or harassment of other people, including current and former employees, job applicants, suppliers, homebuyers, and visitors. This applies in the workplace **and** outside the workplace when you are on Cairn business or where you are (or can be) identified as working for Cairn. This includes in on-line interactions or posts.

The following forms of discrimination or harassment are prohibited under the Policy and are unlawful:

Direct discrimination

Treating someone less favourably or abusing them because of a protected characteristic. This can include rejecting a job applicant on grounds associated with their sexual orientation or gender.

Indirect discrimination

Except with lawful justification, adopting any policy or practice (whether formal or informal) that applies to everyone but adversely affects people with a particular protected characteristic more than others. This can

include putting in place job requirements or conditions that are not necessary, but which mean women will not apply for that job.

Disability discrimination

This 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 and victimisation

This includes sexual harassment and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her. It also includes retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

Recruitment, Selection, and Terms of Employment or Engagement

We will implement equality, diversity and non-discriminatory practices in our recruitment and selection of our workforce, as well as the terms of employment or engagement we provide them.

Recruitment and selection

The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions:

1. Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.
2. Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.
3. We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.
4. We will not confine our recruitment to areas or media sources which provide only, or mainly, applicants of a particular group. However, senior appointments/promotions may be selected without internal vacancy notice if it is deemed at senior management level to be a sensitive appointment with a high level of confidentiality, a specific skill or qualification or if there are time constraints that require an immediate appointment.
5. All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do the job.
6. All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate.
7. Short listing and interviewing will be carried out by more than one person where possible.
8. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.
9. We will not disqualify any applicant because he/she is unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job.
10. Selection decisions will not be influenced by any perceived prejudices of other staff.

Cairn is required by law to ensure that all employees are entitled to work in Ireland. Assumptions about immigration status will never be made and so all prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

Terms of employment

Our terms of employment, benefits and facilities are reviewed periodically to ensure they are available to all who should have access to them, that there are no unlawful obstacles to accessing them.

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

Disabilities

Any of our workforce who is or becomes disabled, is encouraged to be open and honest about their needs to facilitate Cairn providing appropriate support and adjustments.

Anyone who experiences difficulties at work as a result of their disability can speak with their line manager or a member of the HR team to discuss the adjustments they feel would help overcome or minimise the difficulty. Cairn will always make efforts to accommodate disability needs or try and find alternative solutions to support those needs. We will monitor the features of our work to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to help lessen that disadvantage.

Monitoring, Reporting, and Improving

The success of this policy and its objectives is dependent on our monitoring of its implementation, transparency in how we are progressing, and taking positive steps to improve our performance.

Monitoring

We will periodically review the success of this policy by:

- Measuring and recording the diversity profile of our workforce;
- Measuring and recording the gender pay gap of Cairn;
- Engaging with Cairn workforce on the perceived impact and success of this policy, including through confidential employee surveys, analysis, and the seeking of feedback; and
- Reviewing concerns, complaints, and other feedback we receive about equality and diversity at Cairn, for instance, as part of our exit interview process.

Reporting

We will report the progress and success of this policy both internally and externally, including within our Annual Report.

Improving

Through our monitoring, we will identify opportunities to ensure improved equality and diversity at all levels of Cairn. Where needed, we will take steps to identify and remove unjustified barriers to meet the special needs of disadvantaged or underrepresented groups.

We will also work in partnership with the Irish Centre for Diversity and other associated organisations to ensure Cairn can provide a work environment which is equitable and inclusive.

We will review our ambitions annually and develop an annual plan for the continued improvement of our equality and diversity as a business.

Responsibilities

All managers must lead by example and set appropriate standards of behaviour, so ensuring that those they manage adhere to the policy and promote our aims and objectives with regard to equality, diversity, and inclusion. Managers will receive appropriate training on equality and diversity awareness including recruitment and selection best practice.

Raising a concern

This policy is supported by Cairn' Dignity at Work Policy, as well as its Grievance Procedure.

Any employee who believes they have suffered discrimination, harassment or victimisation are encouraged to immediately bring the matter to our attention. This can be through line management, the appropriate Cairn policy, or the Confidential Reporting Policy.