

LumioLex Diversity and Inclusion Policy with Regard to Services and Employees

Document Status: Approved Policy

Effective Date: 6 May 2026

Review Cycle: Annual

Policy Owner: LumioLex Leadership

Applies To: Consultants, contractors, suppliers, clients, professional representatives, counsel, experts and third parties acting for or with LumioLex

1. LumioLex's Commitment

1.1. LumioLex is committed to avoiding and preventing discrimination, harassment, bullying and victimisation, and to promoting equality, diversity and inclusion across its policies, practices, procedures, services and professional relationships.

1.2. This commitment applies to all professional dealings with employees, consultants, contractors, clients, counsel, experts, suppliers, professional representatives and third parties.

1.3. Everyone working with or on behalf of LumioLex is expected and required to treat others with equal attention, courtesy, dignity and respect, regardless of age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

1.4. LumioLex recognises that equality, diversity and inclusion are not merely compliance obligations. They are central to ethical service delivery, sound governance, professional credibility and public trust.

1.5. LumioLex will seek, where appropriate, to support the objectives of recognised legal sector equality, diversity and inclusion initiatives, including relevant guidance issued by the the Law Society and the Equality and Human Rights Commission.

2. Scope of the Policy

2.1. This policy applies to all professional and organisational activities undertaken by LumioLex, including:

- 2.1.1. accepting or declining instructions from clients;
- 2.1.2. providing legal, consultancy, mediation, advisory or related professional services;
- 2.1.3. instructing counsel, experts, consultants, outsourced providers and other third parties;
- 2.1.4. dealings with those representing clients, opponents, public bodies, courts, tribunals or other organisations;
- 2.1.5. recruitment, engagement, training, supervision, progression and termination of employees, consultants and contractors;

2.1.6. marketing, communications, business development and public-facing activity;

2.1.7. all interactions incidental to the provision of LumioLex services.

2.2. This policy applies whether work is undertaken in person, remotely, online, in writing, by telephone, by video conference, or through any other communication method.

2.3. All individuals working with or on behalf of LumioLex must comply with this policy, applicable equality legislation, and any relevant professional or regulatory standards.

3. Legal and Regulatory Framework

3.1. LumioLex is committed to compliance with all applicable equality and anti-discrimination law and relevant professional standards, including, where applicable:

3.1.1. the Equality Act 2010;

3.1.2. the Equality and Human Rights Commission statutory codes, guidance and technical guidance;

3.1.4. relevant Law Society guidance and good practice materials;

3.1.5. applicable data protection legislation, including the UK GDPR and Data Protection Act 2018;

3.1.6. any other legislation, codes of practice, professional standards or guidance relevant to equality, diversity, inclusion, employment, service provision or professional conduct.

3.2. Where LumioLex provides services to, advises, supports or works alongside public authorities, it will also have regard to relevant public sector equality considerations where applicable.

3.3. This policy is intended to reflect both legal compliance and a proactive commitment to best practice.

4. Protected Characteristics

4.1. This policy covers discrimination and unfair treatment connected to the protected characteristics recognised under the Equality Act 2010, namely:

4.1.1. age;

4.1.2. disability;

4.1.3. gender reassignment;

4.1.4. marriage and civil partnership;

4.1.5. pregnancy and maternity;

4.1.6. race, including colour, nationality and ethnic or national origins;

4.1.7. religion or belief;

4.1.8. sex;

4.1.9. sexual orientation.

4.2. These are referred to in this policy as “protected characteristics”.

4.3. LumioLex also recognises that disadvantage and exclusion may arise from wider personal, social or economic circumstances. Where appropriate, LumioLex will seek to promote fairness and inclusion beyond minimum legal requirements.

5. Forms of Prohibited Conduct

5.1. LumioLex does not tolerate any form of unlawful discrimination, harassment, bullying or victimisation.

5.2. The forms of conduct prohibited by this policy include:

5.2.1. **Direct discrimination**, where a person is treated less favourably because of a protected characteristic.

5.2.2. **Indirect discrimination**, where a provision, criterion or practice is applied generally but places, or would place, people sharing a protected characteristic at a particular disadvantage, unless it can be justified as a proportionate means of achieving a legitimate aim.

5.2.3. **Harassment**, where unwanted conduct related to a protected characteristic has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

5.2.4. **Victimisation**, where a person is subjected to a detriment because they have made, supported, or may make or support, a complaint or allegation under equality law or this policy.

5.2.5. **Associative discrimination**, where a person is discriminated against or harassed because of their association with another person who has a protected characteristic.

5.2.6. **Perceptive discrimination**, where a person is discriminated against or harassed because they are perceived to have a protected characteristic, whether or not that perception is correct.

5.2.7. **Bullying**, including offensive, intimidating, malicious, insulting or abusive behaviour, misuse of power, or conduct that undermines, humiliates, denigrates or injures another person.

5.3. Conduct may breach this policy even where there was no intention to offend or discriminate. The impact of conduct will be considered alongside the surrounding facts and context.

5.4. Any malicious or knowingly false complaint may itself be treated as a disciplinary or contractual matter. This does not prevent individuals from raising genuine concerns, including concerns that are ultimately not upheld.

6. Disability, Accessibility and Reasonable Adjustments

6.1. LumioLex recognises its legal and professional duty to make reasonable adjustments for disabled employees, consultants, contractors, clients and service users where required.

6.2. LumioLex is committed to taking reasonable steps to prevent disabled individuals from being placed at a substantial disadvantage when compared with individuals who are not disabled.

6.3. Reasonable adjustments may include, depending on individual circumstances:

- 6.3.1. flexible working arrangements;
- 6.3.2. remote or hybrid working arrangements;
- 6.3.3. adjusted hours or adjusted deadlines where appropriate;
- 6.3.4. time off for medical, therapeutic or disability-related appointments;
- 6.3.5. assistive technology or adapted equipment;
- 6.3.6. accessible communication formats;
- 6.3.7. modified meeting arrangements;
- 6.3.8. adjustments to workstation, working environment or method of service delivery;
- 6.3.9. any other reasonable measure appropriate to the individual circumstances.

6.4. LumioLex will discuss possible adjustments with the individual concerned where it appears that adjustments may be required, or where an adjustment is requested.

6.5. Requests for adjustments will be considered promptly, sensitively and on a case-by-case basis.

6.6. LumioLex will not require a disabled person to disclose more personal or medical information than is reasonably necessary to consider and implement appropriate adjustments.

7. Employment, Engagement and Training

7.1. LumioLex will treat consultants, contractors and applicants fairly and will not unlawfully discriminate in relation to recruitment, engagement, terms, working arrangements, access to training, supervision, performance management, work allocation, progression, grievance handling, disciplinary processes, termination or any other work-related matter.

7.2. LumioLex will seek to create an inclusive working environment in which individuals are respected, supported and able to contribute effectively.

7.3. Equality, diversity and inclusion training will be provided where appropriate and proportionate to the individual's role, responsibilities and level of involvement with LumioLex.

7.4. All individuals working with or on behalf of LumioLex are expected to understand and comply with this policy.

8. Recruitment and Selection

8.1. LumioLex recognises the benefits of a diverse workforce and will seek to recruit from the widest appropriate pool of qualified candidates.

8.2. Recruitment, selection and engagement decisions will be based on merit, capability, experience, suitability and objective role requirements.

8.3. LumioLex will take reasonable steps to ensure that:

8.3.1. opportunities are open and accessible on the basis of individual merit;

8.3.2. role descriptions and selection criteria are limited to requirements necessary for effective performance;

8.3.3. candidates are assessed objectively against relevant criteria;

8.3.4. reasonable adjustments are made for disabled applicants where required;

8.3.5. selection criteria and processes do not unjustifiably disadvantage individuals with protected characteristics;

8.3.6. recruitment agencies, where used, are made aware of LumioLex's equality and non-discrimination expectations;

8.3.7. lawful positive action may be considered where appropriate to address disadvantage, under-representation or particular needs.

8.4. LumioLex will not apply unlawful quotas or discriminate in favour of any person or group. Positive action, where used, will be applied only where lawful and proportionate.

9. Conditions of Service and Workplace Culture

9.1. LumioLex will seek to maintain a working environment that is free from discrimination, harassment, bullying and victimisation.

9.2. Working arrangements, benefits, leave, flexibility, performance processes, dress expectations, work allocation and other conditions of service will be applied fairly and without unlawful discrimination.

9.3. Where appropriate and practicable, LumioLex will take account of specific needs arising from protected characteristics, caring responsibilities, cultural background, religious observance, disability, health needs or other relevant circumstances.

9.4. All individuals working with or on behalf of LumioLex are expected to contribute to a professional culture of dignity, respect, accountability and inclusion.

10. Promotion, Progression and Career Development

10.1. Progression, promotion, increased responsibility and development opportunities within LumioLex will be based on merit, capability, contribution, role requirements and organisational need.

10.2. Selection criteria and processes for progression will be kept under review to reduce the risk of unjustifiable discriminatory impact.

10.3. All eligible consultants or contractors will have fair access to relevant development opportunities appropriate to their role, experience and capability.

10.4. Where lawful and appropriate, LumioLex may take positive action to support individuals or groups who are under-represented, disadvantaged or who have particular needs connected to a protected characteristic.

11. Leadership, Consultants and Senior Representatives

11.1. LumioLex leadership, senior consultants and those representing LumioLex externally have particular responsibility for modelling inclusive, respectful and non-discriminatory conduct.

11.2. Arrangements for appointing, engaging, remunerating, allocating work to, progressing or terminating senior representatives, consultants or contractors will be reviewed where appropriate to prevent discrimination.

11.3. Any individual representing LumioLex must act consistently with this policy and with LumioLex's wider professional standards.

12. Dignity at Work

12.1. LumioLex is committed to maintaining a dignified, respectful and safe professional environment.

12.2. Bullying, harassment, intimidation, humiliation, exclusionary conduct or abuse of power will not be tolerated.

12.3. Concerns relating to dignity at work may be raised under this policy, through any applicable grievance or complaints procedure, or directly with LumioLex leadership.

13. Counsel, Experts, Suppliers and Third Parties

Counsel and Experts

13.1. Counsel, experts, consultants and professional representatives will be selected on the basis of skills, competence, experience, suitability, availability and professional judgement.

13.2. LumioLex will not avoid instructing counsel, experts or other professionals for reasons connected to protected characteristics.

13.3. Where a client requests a named barrister, expert or professional, LumioLex may comply with that request subject to its professional duty to consider suitability and advise appropriately.

13.4. Where a client request appears discriminatory, LumioLex will discuss the request with the client and seek to address or modify it. If the discriminatory basis cannot be justified by a lawful exception, LumioLex may decline to act or withdraw from the matter where appropriate.

Suppliers and Contractors

13.5. Suppliers, contractors, agents and outsourced providers will be selected on the basis of competence, suitability, value, reliability, regulatory compliance and service quality.

13.6. Approved supplier lists or preferred provider arrangements must not contain discriminatory bias connected to any protected characteristic.

13.7. LumioLex expects third parties acting for or with it to respect the principles of equality, diversity and inclusion.

14. Clients and Service Delivery

14.1. LumioLex is generally free to decide whether to accept instructions from a particular client, subject to legal, regulatory and professional obligations.

14.2. Any refusal to act must not be based on discriminatory grounds, and care must be taken to avoid any perception that discriminatory grounds have influenced the decision.

14.3. LumioLex will seek to provide services in a fair, inclusive, accessible and non-discriminatory manner.

14.4. LumioLex will take reasonable steps to meet clients' different needs arising from disability, language, communication needs, caring responsibilities, cultural background, religious observance, vulnerability or other relevant circumstances.

14.5. Where permitted by law, LumioLex may provide tailored or targeted services to meet specific needs, support access to justice, or address disadvantage.

14.6. LumioLex will not support, enable or give effect to discriminatory instructions.

15. Promoting Equality, Diversity and Inclusion

15.1. LumioLex is committed to preventing unlawful discrimination and promoting equality, diversity and inclusion within the organisation and in areas where it has influence.

15.2. Equality, diversity and inclusion form part of LumioLex's wider business ethics, service quality, governance and professional standards.

15.3. LumioLex will seek to promote inclusive practice through:

15.3.1. clear policy standards;

- 15.3.2. leadership accountability;
- 15.3.3. proportionate training and awareness;
- 15.3.4. fair recruitment and engagement practices;
- 15.3.5. accessible client service delivery;
- 15.3.6. responsible supplier and professional selection;
- 15.3.7. inclusive marketing and communication practices.

15.4. All individuals acting on behalf of LumioLex will be expected to pay due regard to this policy when conducting business or providing services.

16. Implementation and Responsibility

16.1. Ultimate responsibility for implementation of this policy rests with LumioLex leadership.

16.2. Day-to-day responsibility for compliance sits with all employees, consultants, contractors and individuals acting on behalf of LumioLex.

16.3. Everyone covered by this policy must:

- 16.3.1. treat others fairly, respectfully and without discrimination;
- 16.3.2. comply with this policy and applicable equality law;
- 16.3.3. avoid conduct that may amount to discrimination, harassment, bullying or victimisation;
- 16.3.4. raise concerns promptly where a breach may have occurred;
- 16.3.5. cooperate with any investigation into concerns raised under this policy.

16.4. Breach of this policy may result in disciplinary action, termination of engagement, removal from supplier arrangements, refusal of further instructions, reporting to a regulator where required, or other appropriate action.

16.5. Individuals may also incur personal liability for unlawful discrimination, harassment or victimisation.

17. Complaints and Reporting

17.1. LumioLex will take seriously all complaints or concerns relating to discrimination, harassment, bullying or victimisation.

17.2. Concerns may be raised by employees, consultants, contractors, clients, counsel, experts, suppliers, professional representatives or third parties.

17.3. Complaints should be raised promptly by contacting LumioLex at info@lumiolex.com or through any applicable complaints, grievance, disciplinary or contractual procedure.

17.4. All complaints will be investigated fairly, proportionately and confidentially so far as reasonably possible.

17.5. No person will suffer detriment for raising a genuine concern or participating in an investigation in good faith.

17.6. Where a complaint is upheld, LumioLex will take appropriate action, which may include corrective action, apology, training, disciplinary action, termination of engagement, or review of policies and procedures.

18. Monitoring and Review

18.1. LumioLex will monitor and review this policy in a manner proportionate to the size, nature and structure of the organisation.

18.2. This policy will be reviewed at least annually, or earlier where there are material changes in law, regulation, professional guidance, organisational structure or operational risk.

18.3. Where appropriate, LumioLex may monitor and review anonymised or aggregated information relating to:

- 18.3.1. workforce composition;
- 18.3.2. recruitment and selection outcomes;
- 18.3.3. training and development access;
- 18.3.4. progression and work allocation;
- 18.3.5. complaints, grievances and disciplinary outcomes;
- 18.3.6. client accessibility and reasonable adjustment requests;
- 18.3.7. supplier and professional instruction practices.

18.4. Any monitoring will be conducted sensitively, lawfully and proportionately. Individuals will not be required to disclose protected characteristic information unless there is a lawful basis and appropriate transparency.

18.5. LumioLex will use monitoring and review outcomes to identify improvement areas and strengthen inclusive practice.

19. Data Protection

19.1. LumioLex will process personal data collected for equality, diversity and inclusion purposes in accordance with applicable data protection legislation, including the UK GDPR and Data Protection Act 2018.

19.2. Equality and diversity monitoring data will be processed only where there is a lawful basis for doing so and will be handled confidentially, securely and proportionately.

19.3. Special category data, including information about race, ethnic origin, religion, health, disability, sexual orientation or other sensitive matters, will be processed only where permitted by law and subject to appropriate safeguards.

19.4. Individuals will be informed, where appropriate, about how their data is used, the purpose of processing, retention arrangements and their rights.

20. Policy Review and Approval

20.1. This policy will be reviewed annually by LumioLex leadership.

20.2. Any amendments will be approved by LumioLex leadership and communicated to relevant individuals.

20.3. The most recent approved version of this policy will supersede all previous versions.