

# Inclusion and Fair Treatment Policy (Tuff UK)

The practical implementation of this policy is governed by our Equal Treatment and Cultural Integration Plan, which details our specific self-management frameworks and 'Rules of the Game'.

## Background

Within Tuff Leadership Training<sup>1</sup>, we have long cultivated an inclusive work climate where everyone can contribute fully, bringing their unique experiences and backgrounds to the table. We believe that when people feel safe and included, the business runs more efficiently and with higher quality.

Legally and ethically, we stand against any treatment where someone is disadvantaged or offended because of one of the nine protected characteristics:

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

## Purpose and Scope

The purpose of this policy is to establish a clear, shared position within Tuff Leadership Training. We are committed to actively working against discrimination and ensuring that a culture of inclusion permeates every aspect of the training and education we provide.

This policy applies to all employees, directors, and subcontractors acting on behalf of Tuff Leadership Training. All subcontractors are expected to follow these principles as a condition of their engagement. We also hold ourselves responsible for ensuring that our training environments are inclusive and safe for all participants and delegates.

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<sup>1</sup> For the purposes of this policy, Tuff Leadership Training UK Ltd and Tuff Ledarskapsträning Stockholm AB are both referred to as 'Tuff' or 'Tuff Leadership Training'. Both entities are expected to adhere to the local laws on discrimination and ethical treatment. This policy has been designed to reflect the highest required standard of both entities.

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The practical implementation and daily governance of this policy are detailed in our Equal Treatment and Cultural Integration Plan, which outlines the specific self-management frameworks and 'Rules of the Game' we use to ensure these standards are lived out in practice

## Guidelines: What is Discrimination?

UK law identifies several types of discrimination. We are committed to identifying and preventing:

- **Direct Discrimination:** Treating someone less favourably than another in a comparable situation because of a protected characteristic.
- **Indirect Discrimination:** When a rule or routine appears neutral but, in practice, disadvantages a specific group. This is only permitted if the practice is a proportionate means of achieving a legitimate aim (e.g., a vital health and safety requirement).
- **Failure to Provide Reasonable Adjustments:** We are proactive in making reasonable adjustments to ensure that disabled people—including subcontractors and participants—are not placed at a substantial disadvantage.
- **Harassment and Sexual Harassment:** Unwanted conduct that violates a person's dignity or creates an intimidating, hostile, or offensive environment. Harassment is determined by its impact on the recipient, not the harasser's intent. While we encourage individuals to speak up if they feel they can, Tuff will take action regardless of whether a formal remark was made to the harasser at the time.
- **Victimisation:** Treating someone less favourably because they have made, or intend to make, a complaint of discrimination or have acted as a witness.
- **Instructions to Discriminate:** Ordering someone else to discriminate (e.g., a manager instructing a subcontractor to exclude a specific group from a session).

## Active Measures (Our Proactive Commitment)

Beyond mere compliance, we follow the higher standard of "Active Measures" to continuously counter discrimination. This work is documented and carried out in four ongoing stages:

1. **Investigate** risks of discrimination or barriers to inclusion.
2. **Analyse** the causes of these risks.
3. **Implement** specific actions to mitigate them.
4. **Follow up** and evaluate the results.

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We apply this proactive lens to five key areas:

- Working conditions and the training environment.
- Pay, benefits, and conditions of engagement.
- Recruitment and promotion (including subcontractor selection).
- Education, training materials, and skill development.
- Work-life balance and family-friendly rights.

We conduct regular Equality Impact Assessments of our training materials to ensure we are not inadvertently reinforcing biases or excluding any group.

## Responsibility

At Tuff Leadership Training, responsibility is shared. All employees and subcontractors are responsible for ensuring that laws are followed and for actively combating discrimination in daily practice.

Everyone has a responsibility to ensure this policy is communicated and upheld. We cooperate across all levels of the business to ensure that discrimination has no place in our work.