

DIVERSITY AND INCLUSION POLICY

1. POLICY STATEMENT

1.1 The Company recognises that discrimination, harassment and victimisation are unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to promote a culture of respect and dignity, and will actively challenge unlawful or unfair discrimination if it occurs. We will not tolerate an employee or job applicant receiving less favourable treatment (either directly or indirectly) in recruitment or employment, and will not treat anyone less favourably on the grounds of any protected characteristic under the Equality Act 2010. These are:

- Age;
- Disability;
- Gender reassignment;
- Marital or civil partner status;
- Pregnancy or maternity;
- Race (which includes colour, nationality, ethnic or national origin);
- Religion or similar belief;
- Sex; and/or
- Sexual orientation

1.2 Diversity and inclusion (D&I) are often connected, but are actually different from one another.

- Diversity is about recognising and embracing differences
- Inclusion is about valuing those differences, removing barriers and allowing all to contribute.

1.3 The Company values the benefits that diversity and inclusion can bring to its ongoing success. We are committed to providing equality of opportunity and a supportive and inclusive culture, where we recruit, develop and retain the most talented individuals, regardless of their background. Employees will be respected, treated fairly and consistently, and encouraged to reach their full potential, develop and utilise their talents to the full, uninhibited by fear of prejudice or harassment.

1.4 We will support our management and employees to enable them actively to promote and incorporate the principles of equality, diversity and inclusion into their roles. Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

1.5 We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to ensure equality and fairness for all in our employment.

1.6 All employees, whether part-time, full-time or temporary or contractors, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will only be on the basis of aptitude and ability. All employees will be helped

and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

- 1.7 Our staff will not discriminate directly or indirectly, or harass customers or clients because of any protected characteristic in the provision of the Company's services.
- 1.8 This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, Government Departments, and any other statutory bodies.

2. OUR COMMITMENT

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying, harassment or victimisation will be tolerated.
- Training, development and progression opportunities are available to all employees.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management.
- The policy will be monitored and reviewed regularly.
- To create a working environment where individual differences are recognised and valued.
- Not to tolerate any form of intimidation, bullying or harassment and to deal with such matters under the disciplinary policy, and consider such matters as a potential breach of the Conduct Rules.
- To promote an environment where anyone who feels they have been subject to discrimination to raise their concerns without the fear of reprisal, so we can deal with the matter appropriately.
- To have a zero-tolerance policy for failure to treat everyone with dignity and respect.
- To ensure all employees are aware of the existence of this policy, their obligation to comply with its requirements, and that non-compliance will be dealt with under the disciplinary rules, and (depending on the circumstances) could be classed as gross misconduct and a breach of the Conduct Rules resulting in dismissal.

3. RESPONSIBILITIES OF MANAGEMENT

- 3.1 Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the CEO and HR Manager. They will be supported by the

managers who will ensure that they and their employees operate within this policy and arrangements, and all reasonable and practical steps are taken to avoid discrimination.

3.2 We will ensure that:

- all employees are aware of the policy and the arrangements, and the reasons for the policy;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.
- HR will be responsible for monitoring the operation of the policy in respect of employees and job applicants, and will be subject to periodic departmental audits.

4. RESPONSIBILITIES OF EMPLOYEES

4.1 Responsibility for ensuring that there is no unlawful discrimination rests with all employees and the attitudes of employees are crucial to the successful operation of fair employment practices. In particular, all employees should:

- comply with the policy and arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other employees or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform their manager if they become aware of any discriminatory practice.

5. THIRD PARTIES

5.1 Third-party harassment occurs where an employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. The Company will not tolerate such actions against its employees and the employee concerned should inform their manager / supervisor at once that this has occurred. The Company will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

6. RELATED POLICIES AND ARRANGEMENTS

6.1 All employment policies and arrangements have a bearing on equality of opportunity. Company policies will be reviewed regularly and any identified discriminatory elements removed.

7. RIGHTS OF DISABLED PEOPLE

7.1 Under the terms of this policy, managers are required to:

- make reasonable adjustment to maintain the services of an employee who

becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice and guidance from external agencies where appropriate to maintain disabled people in employment);

- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

8. TRAINING

8.1 Training will be provided to employees on equality issues. It is the responsibility of all employees to familiarise themselves with this policy and raise queries or additional training needs with their manager or HR, especially those who have an involvement in the recruitment and selection process.

9. GRIEVANCES / DISCIPLINE

9.1 Employees have a right to pursue a complaint concerning discrimination, harassment or victimisation via the Company's Grievance Procedures. Discrimination, harassment and victimisation will be treated as disciplinary offences and they will be dealt with under the Company's Disciplinary Procedure.

10. SCOPE

10.1 This policy applies to all employees within the Company regardless of seniority or status.

10.2 This policy is not contractual and does not form part of your Contract of Employment.

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