

Diversity, Equity, Inclusion & Belonging

We are an equal opportunity employer, and we are fully committed to a policy of treating all of our employees and job applicants equally and with dignity. We will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

We believe that fostering a sense of belonging is essential to creating an inclusive and supportive work environment. Belonging means that every employee feels accepted, valued, and included, regardless of their background or identity. We are committed to ensuring that all employees feel a sense of belonging by encouraging open and respectful communication, promoting a culture of inclusion, providing opportunities for connection, supporting employee resource groups, and regularly assessing and addressing any barriers to belonging.

All reasonable steps will be taken to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origins and caste), religion or belief, sex or sexual orientation. These are known as the “protected characteristics”.

You have a duty to co-operate with us to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination. You should draw the attention of the HR team to suspected discriminatory acts or practices. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct in accordance with our disciplinary procedure. You should support colleagues who suffer such treatment and are making a complaint.

Direct discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or Employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant’s or employee’s own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics. We will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

Indirect discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all

job applicants or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is, applied to a job applicant or employee, a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant's or employees. A PCP is discriminatory in relation to a protected characteristic of the job applicant's or Team Member's if:

- it is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic;
- the PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it;
- it puts, or would put, the job applicant or employee at that disadvantage, and;
- it cannot be shown by us to be a proportionate means of achieving a legitimate aim.

We will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

Victimisation

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination. We will take all reasonable steps to eliminate victimisation in all aspects of employment.

Bullying and harassment

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an individual. You unlawfully harass another person if you engage in unwanted conduct related to a protected characteristic, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

You also unlawfully harass another person if you engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Finally, you unlawfully harasses another person if you or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person, and because of that other person's rejection of or submission to the conduct, they treat that other person less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party with whom the person is associated and not on the person's own protected characteristic, or if it was directed at someone other than that person, or even at nobody in particular, but they witnessed it. In addition, harassment

can include cases where the unwanted conduct occurs because it is perceived that a person has a particular protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a “joke” or as “office banter” may offend another person. This is because different people find different levels of behaviour acceptable, and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend another person will always constitute harassment without the need for that person having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular person, for example, a “joke” or as “office banter”. In these cases, the behaviour will constitute harassment if the conduct continues after that person has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature;
- subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to a protected characteristic;
- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances;
- jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic;
- demeaning comments about a Team Member’s appearance;
- questions about a Team Member’s sex life;
- the use of nicknames related to a protected characteristic whether made orally or by e-mail;
- picking on or ridiculing an employee because of a protected characteristic;
- isolating an employee or excluding him or her from social activities or relevant work-related matters because of a protected characteristic.

Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. We are committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Our advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, we will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would

exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic;

- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, we will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The employee responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. 'Role Profiles', will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new employees will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, we will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled. If it is necessary to assess whether personal circumstances will affect the performance of the job, this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

Training and promotion

We will train all of its team on our policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices. All of our team will be responsible for ensuring they actively promote equality of opportunity. We will also provide training to all employees to help them understand their rights and responsibilities in relation to equal opportunities and what they can do to create a work environment that is free from discrimination.

Equal pay and equality of terms

We are committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent under a job evaluation study or work of equal value. In order to achieve this, we will endeavour to maintain a pay system that is fair and transparent, free from gender bias and based on objective criteria. Where it is legally obliged to do so, we will also prepare and publish an annual gender pay gap report in accordance with

statutory requirements from time to time in force.

Reporting complaints

Whilst we encourage employees who believe they are being harassed or bullied to notify the offender (by words or conduct) that his or her behaviour is unwelcome, we also recognise that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, you should follow the procedure set out below.

You should draw the attention of the HR team to suspected cases of inequality, harassment, bullying or intimidation. You must not victimise or retaliate against anyone who has made allegations or complaints of harassment, inequality, discrimination, bullying or intimidation, whether engaged by any of our employees or outside third parties. Such behaviour will be treated as potential gross misconduct in accordance with our disciplinary procedure. You should support colleagues who suffer such treatment and are making a complaint.

All allegations of discrimination will be dealt with seriously, confidentially and speedily. We will not ignore or treat lightly grievances or complaints of unlawful discrimination from employees. If you wish to make a formal complaint of discrimination, you should do so promptly and use the grievance procedure.

We will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment, bullying, intimidation or discrimination against any of our employees. This policy covers harassment, bullying, discrimination or intimidation both in the workplace and in any work-related setting outside the workplace, for example during business trips, at external training events or at work-related social events.

Employee Obligations

You have a duty to co-operate with us to make sure that this policy is effective in preventing inequality or harassment or bullying. Action will be taken under our disciplinary procedure against any employee who is found to have committed an act of improper or unlawful harassment, bullying or intimidation. Serious breaches of this dignity at work policy statement will be treated as potential gross misconduct and could render you liable to summary dismissal. You should bear in mind that you can be held personally liable for any act of unlawful harassment, discrimination, bullying or intimidation. If you commit serious acts of harassment, you may also be guilty of a criminal offence.

You are responsible for conducting yourself in accordance with this policy. We will not condone or tolerate any form of harassment, bullying, discrimination, or intimidation, whether engaged in by any of our employees or outside third parties who do business

with us, such as clients, customers, contractors and suppliers

Monitoring equal opportunity

We will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity is being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, we will implement them. We will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.