

2.12 EQUAL OPPORTUNITIES POLICY

This policy aims to foster a culture of Equality and to recognise the positive contribution that each individual can make to the business irrespective of their sex, marital or civil partner status, pregnancy or maternity, sexual orientation, gender reassignment, race religion or belief, age or disability ("the **Protected Characteristics"**).

This policy covers all employees including volunteers, interns, casual/relief workers and agency staff.

Employees are entitled to be treated with respect and dignity and the Company will not tolerate any less favorable treatment of any person on the grounds of the Protected Characteristics. It should be noted that Employees have a personal responsibility for the implementation of this policy and to ensure that they treat others with the respect and dignity that they expect to be treated with themselves.

We encourage using gender-inclusive language which means speaking and writing in a way that does not discriminate against a particular sex, social gender or gender identity, and does not perpetuate gender stereotypes. Given the key role of language in shaping cultural and social attitudes, using gender-inclusive language is a powerful way to promote gender equality and eradicate gender bias. We encourage a working environment that embraces equality, eradicates bias and is inclusive for all staff. This policy applies to the advertisement of jobs, recruitment and appointment, promotion, training and development, terms and conditions of work, performance management, pay, termination of employment, any references issued and to every other aspect of employment with the Company. All terms and conditions of employment and related benefits shall be non-discriminatory, other than where there are legal grounds for discriminating such as in the case of gender specific jobs. Applicants for employment will be assessed according to their skills, experience, and suitability for the job.

The Company also aims to provide a service that does not discriminate against its clients and customers in how they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

Remedies

The senior management of the Company (supported by HR) will take responsibility for monitoring the implementation of this policy. However, if any Employee believes that he or she has been discriminated against, harassed or victimised on any of the grounds referred to above, he or she may raise the matter informally with his or her immediate line manager. If the Employee wishes to raise the matter further, he/she should invoke the Company's grievance procedure setting out in detail the basis of their complaint. All such complaints will be taken seriously by the Company. All complaints shall be treated in confidence and investigated fully by an independent member of management. False allegations which are



found to have been made in bad faith, however, will be dealt with under the Company Disciplinary Procedure.

If an Employee is found to have discriminated against, harassed or victimised another Employee he or she will be subject to disciplinary proceedings and, depending on the seriousness of the incident, may be dismissed for Gross Misconduct. In exceptionally serious cases the police may also be involved.

Types of Unlawful Discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favorably because of one or more of the protected characteristics set out above.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage.

Associative discrimination is where someone is directly discriminated against or harassed for association with another person who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive discrimination is where someone is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity)].

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. (For further information refer to the Anti-harassment and Bullying Policy].

Third party harassment related to gender, sexual orientation, gender reassignment, race, religion or belief, age or disability is also unacceptable.

Victimisation is also prohibited under this policy. This is less favourable treatment of someone who has raised or supported a complaint or raised a grievance under the Equality Act 2010 for discrimination or harassment, or because they are suspected of doing so.

Disability

The Company is committed to ensuring equality of opportunity for those Employees who are disabled or become disabled for the purposes of the Equality Act 2010 during their employment with the Company.



Employee Handbook

If an Employee is disabled or becomes disabled, the Employee is encouraged to advise the Company of that fact in order that the appropriate support may be offered.

If an Employee experiences difficulty at work because of a disability, the Employee should contact his/her line manager to discuss any reasonable adjustments that would help to overcome or minimise the difficulty. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services, the line manager and the HR department may wish to consult with the Employee and any medical adviser(s) about possible adjustments. This could also include consultation with the Company's Occupational Health provider. The Company will consider the matter carefully and seek to make appropriate reasonable adjustments to the Employee's role based on that medical advice.

If an Employee is unable to continue in their current role because of a disability, the Company will consider any relevant alternative roles and vacancies they may have as a way of retaining the services of that Employee where possible.