

Equal Opportunities, Diversity and Inclusion Policy

The Company is committed to promoting equal opportunities and diversity and inclusion in employment. The concept of diversity encompasses acceptance and respect; it means understanding that each individual is unique and recognising our individual differences.

You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).

This policy sets out our approach to equal opportunities and the avoidance of unlawful discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and the termination of employment.

This policy does not form part of any employee's contract of employment and may be amended at any time.

1.1 Unlawful discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts, or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- (a) direct discrimination: treating someone less favourably because of a Protected Characteristic;
- (b) indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified;
- (c) harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Harassment is dealt with further in our Anti-harassment and Bullying Policy;
- (d) victimisation: this is retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment; and
- (e) disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

1.2 Disabilities

If you are disabled, or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

1.3 Part-time and fixed-term work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) than such comparable full-time



or permanent employees, unless different treatment is justified.

1.4 Recruitment and selection

Recruitment, promotion and other selection exercises such as redundancy selection must all be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person and with the involvement of HR where possible.

Vacancies should generally be advertised to a diverse selection of potential candidates, and advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of HR (for example, questions to establish whether an applicant is fit to attend an assessment of any reasonable adjustments that may be needed at interview; questions necessary to establish whether an applicant can perform an intrinsic part of the job; and for equal opportunities monitoring which will not form part of the selection or decision-making process).

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (e.g. passport) before employment starts, to satisfy current immigration legislation.

1.5 Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Antiharassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You are entitled not to be victimised or retaliated against for complaining about discrimination. Making a false allegation deliberately and in bad faith, however, will be considered to be gross misconduct and dealt with under our Disciplinary Procedure.