

Equality, Discrimination and Inclusion Policy

1 Policy statement

1.1 The Company is fully committed to providing equal opportunities for all employees, workers and job applicants, and to eliminating unlawful and unfair discrimination. The Company aims to create a culture that encourages and values diversity, and that appoints, rewards and promotes staff based on merit.

1.2 The Company will not unlawfully discriminate against any employee, worker or job applicant because of any 'protected characteristic', namely:

- age;
- disability;
- gender reassignment;
- marriage or civil partnership status;
- pregnancy and maternity;
- race (including colour, nationality and ethnic or national origin);
- religion or belief;
- sex; or
- sexual orientation.

1.3 Equally, the Company will not treat any employee, worker or job applicant less favourably because:

- they work part-time or on a fixed-term basis;
- of their socio-economic background; and/or
- they have caring responsibilities.

1.3.1 Introduction

1.4 The statement in paragraph 1 sets out the Company's commitment to ensuring that all staff and job applicants have equal opportunities. The remainder of this document sets out the Company's policy on equality and diversity, in particular:

- what the Company regards as acceptable behaviour at work, and what is not acceptable;
- the rights and responsibilities of those to whom the policy applies;

- the procedure for dealing with concerns or complaints;
 - how the Company will deal with any breach of this policy;
 - who is responsible for the policy; and
 - how it will be implemented, monitored and reviewed.
- 1.5 This policy applies to employees, temporary and agency workers, interns, volunteers, apprentices and job applicants. All staff are responsible for ensuring that there is no discrimination in the workplace, as outlined in the policy statement set out at paragraph 1, and for ensuring that this policy is applied on a day-to-day basis. They are also expected to apply the principles of equal opportunities and non-discrimination in their interactions with clients, suppliers, business partners and visitors. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant. For information on particular responsibilities, see paragraphs 1.14 and 1.15 below.
- 1.6 This policy has been drafted with the assistance of a representative group of employees, to ensure that it is workable, clear and easy to understand. This policy does not form part of your contract of employment and we may amend, update or supplement it from time to time. We will circulate any new or modified policy to staff when it is adopted.
- 1.7 This policy sets out the principles that should be applied to ensure equal opportunities in the areas of:
- recruitment and selection (see paragraph 1.30);
 - promotion, appraisal, transfer and training (see paragraph 1.31.1);
 - terms of employment, benefits, facilities and services (see paragraph 1.32.1); and
 - grievance and disciplinary procedures, dismissals, resignations and redundancies (see paragraph 1.33.1).
- 1.8 This policy should be considered alongside other Company policies, such as those dealing with harassment and bullying, family leave (maternity, paternity, adoption, shared parental, parental), emergency time off for dependants, dress code and flexible working, copies of which are available from HR Director.

1.9 Equality principles

- 1.10 As set out in the policy statement, there must be no unlawful discrimination in the workplace because of any of the protected characteristics or other factors set out in the policy statement in paragraph 1 above. The types of discrimination that are prohibited are explained at paragraph 1.11 below.
- 1.11 For the purposes of this policy 'discrimination' includes direct and indirect discrimination and other 'prohibited conduct' under the Equality Act 2010. Discrimination may take the form of:

- 1.11.1 **direct discrimination**—this is treating someone less favourably (or, in the case of pregnancy and maternity, unfavourably) because of a protected characteristic. An example of this would be paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and will cover behaviour that takes place, for example because of sexual orientation, even if the person is not in fact gay, and even if the perpetrator knows that they are not gay. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic, e.g. because a worker is the primary carer for a disabled child. In relation to age only, if the employer can show objectively that discriminating on the basis of age is a proportionate means of achieving a legitimate aim, then it will not be unlawful;
- 1.11.2 **indirect discrimination**—this is treating a group of people in the same way, but in a way which adversely affects those with a protected characteristic. An example of this would be telling all employees that they have to work late at night—although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women. Such treatment is unlawful unless it can be objectively justified;
- 1.11.3 **victimisation**—this is treating someone less favourably because they have alleged discrimination or asserted their right not to be discriminated against because of a protected characteristic. An example of this would be a disabled employee claiming that they had been discriminated against, who is then refused a reference by their manager because of that claim;
- 1.11.4 **harassment**—this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature. It may also occur where someone harasses the victim, the victim either rejects or submits to the harassment and, because of that rejection or submission, that person then treats the victim less favourably;
- 1.11.5 In the case of disability only, **discrimination arising from disability**—this is unfavourable treatment of the disabled person because of something arising in consequence of their disability. Such treatment is unlawful unless it can be objectively justified;
- 1.11.6 In the case of disability only, **the duty to make reasonable adjustments**—this duty comprises three requirements, each of which arises where a disabled person at a substantial disadvantage in relation to a 'relevant matter':
- (a) the first is a requirement, where a provision, criterion or practice puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage;
 - (b) the second is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a

relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage; and

- (c) the third is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

1.12 The Company will appoint, train, develop, reward and promote staff on the basis of merit and ability.

1.13 The principles set out in this policy apply:

1.13.1 in the workplace; and

1.13.2 outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events.

1.14 Special responsibility for the practical application of the Company's equality policy falls upon managers, and supervisors involved in the recruitment, selection, appraisal, promotion and training of employees and the way their terms of employment are fixed.

1.15 The Company's Chief Compliance Officer is responsible for this policy, its implementation, monitoring and review.

1.16 If you have any doubt or concern about this policy, or how it should be applied in any particular instance or situation, please contact Chief Compliance Officer as soon as possible.

1.17 If you believe you have been unfairly treated in breach of this policy, you should follow the Company's Grievance Procedure, which is available in the staff handbook. The harassment complaints procedure set out in the Company's harassment and bullying policy is also available to any employee who believes that they may have been harassed or bullied. Employees will not be adversely affected in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.

1.18 The Company will not tolerate behaviour that goes against this policy, and where an employee is alleged to have breached this policy, they will be subject to the Company's disciplinary procedure. Disciplinary action will be taken against any employee who is found to have breached this policy. Serious breaches of this policy, acts of unlawful discrimination and serious incidents of harassment and bullying will be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter. The Company will keep confidential records of matters dealt with in accordance with this policy.

1.19 Implementation

1.20 This equality policy will be displayed on the Company intranet and website. A copy of this policy is available in the HR portal.

1.21 The Company will also provide staff training on the policy when it is implemented, and on a regular ongoing basis.

1.22 The Company will ensure that all managers and supervisors with responsibility for any of the aspects of the employment relationship listed in paragraph 1.7 above are provided with more detailed training on how to manage equality and diversity issues in the workplace. Other staff may also be required to attend equality and diversity training. Attendance at training will be compulsory if you are notified that you should attend a course.

1.23 Training may include:

- an outline of the law covering the protected characteristics and discrimination;
- why the Company has introduced this policy and how it will be put into practice;
- examples of what is and is not acceptable conduct in the workplace;
- the risk of condoning or seeming to approve inappropriate behaviour, and the risk of personal liability;
- how prejudice can affect the way an employer functions and the impact that generalisations, stereotypes, bias or inappropriate language in day-to-day operations can have on people's chances of obtaining work, promotion, recognition and respect; and
- the equality monitoring process.

1.24 Training will be designed in consultation with the Company's staff, workplace representatives and managers, incorporating feedback from previous training. If in-house trainers are used, the Company will ensure that they themselves receive training. External trainers will be fully informed about this policy and other relevant Company policies.

1.25 Monitoring and review

1.26 The HR Director and Chief Compliance officer will regularly monitor the effectiveness of this policy to ensure that it is working in practice and that the aims set out in the policy statement are being met. Monitoring will include the key areas of:

- recruitment and promotion, including the range of people applying for work;
- pay and benefits;
- training;
- appraisals;
- disciplinary and grievance matters;
- dismissals and reasons for resigning.

- 1.27 The Company will report back to managers, staff and worker representatives regularly on progress, and whether the objectives of this policy are being achieved.
- 1.28 In order to monitor diversity in these areas, the Company will need to process personal data and special category data (formerly known as 'sensitive personal data') in accordance with its data protection policy.
- 1.29 The Company will review this policy and related procedures and practices on equality and diversity regularly.

1.30 Recruitment and selection

- 1.31 The Company will apply the following principles in recruiting or selecting for positions, whether externally or internally:
- individuals will be assessed according to their personal capability to carry out a given job;
 - assumptions will not be made that only certain types of people will be able to perform certain types of work;
 - the required level of skills, knowledge or qualifications will not be overstated;
 - avoid specifying an age requirement—while there may be instances where this can be objectively justified, these are likely to be rare; if considering an age limit for a particular post, managers should consult the Chief Compliance Officer;
 - avoid asking for 'so many years' experience'—again, this will amount to indirect discrimination unless it can be objectively justified;
 - avoid recruiting only internally or by word of mouth unless there is a good reason for doing so—advertising more broadly may help increase applications from a more diverse pool of talent;
 - selection tests should be specifically related to job requirements and should measure the person's actual or inherent ability to do or train for the work;
 - review selection tests regularly to ensure they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism;
 - process all applications in the same way and ask the same questions at interview;
 - keep written records of interviews and reasons for appointment and non-appointment, in accordance with the Company's retention policy;
 - ensure that questions at interview relate to the requirements of the job;
 - if a provision, criterion or practice for recruitment and selection puts disabled people at a substantial disadvantage for a reason connected with their disability, ensure that reasonable adjustments are made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. This could, for

example, mean making different interview arrangements for an applicant with mobility problems or arranging for facilities for applicants with sight or hearing impairments; and

- decisions regarding the method of recruitment or selection or who is recruited or selected should only be made by a person who has read and understood this policy and undergone relevant training.

1.31.1 Promotion, transfer and training

1.32 The Company will apply the following principles to appointments for promotion, transfer and training:

- examine assessment criteria and appraisal schemes carefully to ensure that they are not discriminatory, whether directly or indirectly;
- monitor assessment criteria and appraisal schemes on a regular basis and, where such criteria or schemes result in predominantly one group of workers gaining access to promotion, transfer or training or being awarded a particular appraisal grade, check them to make sure this is not due to any hidden or indirect discrimination;
- regularly monitor promotion and career development patterns to ensure that access to promotion, training and career development opportunities is not denied to particular groups or types of workers;
- avoid traditional qualifications and requirements for promotion, transfer and training, such as length of service, years of experience or age unless they can be objectively justified by reference to the job requirements;
- ensure that policies and practices regarding selection for training, day release and personal development do not result in an imbalance in training between groups of workers; and
- if any provision, criterion or practice relating to promotion, appraisal, transfer or training puts disabled workers at a substantial disadvantage for a reason connected with their disability, ensure that reasonable adjustments are made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. For example, this could be making training available for a disabled worker in a different way, in a different location or at a different time.

1.32.1 Terms of employment, benefits, facilities and services

1.33 The Company will apply the following principles to terms of employment, benefits, facilities and services:

- review regularly the terms of employment, benefits, facilities and services available to workers to ensure that they are provided in a way which is free from unlawful discrimination;
- ensure that part-time workers receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified — managers who are responsible for part-time workers should, in

particular, take advice from the HR Director when assessing pay and benefits for part-time workers;

- if any provision, criterion or practice relating to terms of employment, benefits, facilities and services puts disabled workers at a substantial disadvantage due to a reason connected with their disability, ensure that reasonable adjustments are made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. Managers responsible for disabled workers should, in particular, take advice from the HR Director when assessing pay and benefits for disabled workers;
- examine carefully and monitor regularly pay and bonus criteria, policies and practices and, if it appears that any group of workers are disadvantaged by them, check them to make sure that this is not due to any hidden or indirect discrimination.

1.33.1 Grievances, disciplinary procedures, dismissals and redundancies

- 1.34 Workers who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an equality or equal opportunities matter will not be disciplined, dismissed or otherwise suffer any adverse treatment for having done so.
- 1.35 No member of a particular group of workers will be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group, unless there is genuine and lawful justification for different treatment.
- 1.36 Redundancy criteria and procedures will be carefully examined to ensure that they are not applied and do not operate in an unlawfully discriminatory manner.
- 1.37 The provision of any voluntary redundancy benefits will be equally available to all workers unless there is a genuine and lawful justification for doing otherwise.

1.38 Considerations relating to disability

- 1.39 Disabled people, including job applicants and employees, should be able to participate in all of the Company's activities fully, on an equal basis with people who are not disabled.
- 1.40 Due to the wide variety of potential disabilities, and the likelihood of a disability affecting different people in different ways, the Company does not prescribe rigid rules on how issues concerning disabled people should be dealt with. What is essential is that all managers and supervisors take all reasonably practical steps to ensure that disabled people are not less favourably treated or disadvantaged by comparison to people who are not disabled in relation to their work, working environment, or by any provision, criterion or practice used by the Company. Managers and supervisors need to be aware in particular that an employee on long-term sick leave or with intermittent sickness absence may be disabled.
- 1.41 The Company is particularly concerned that disabled workers are treated equally in the following areas:
- recruitment and selection;

- promotion, transfer and training;
- terms of employment, benefits, facilities and services; and
- dismissals, resignations and redundancies.

1.42 For the purpose of this policy, a disability is a physical or mental impairment that has a substantial and long-term effect upon a person's ability to carry out normal day-to-day activities. Cancer, HIV infection and multiple sclerosis are disabilities from the point of diagnosis.

1.43 Some disabilities are immediately obvious, for example use of a wheelchair, while other disabilities may not be apparent at all, for example HIV infection. Certain conditions are not considered to be disabilities, for example poor eyesight that is corrected simply by wearing prescription spectacles, or addiction to alcohol or other substances. If you would like further information about whether a particular condition is a disability you should contact the Chief Compliance Officer.

1.44 The general equality and equal opportunity principles set out earlier in this policy will apply in relation to disabled people whether they currently have a disability or have had a disability in the past.

1.45 The Company will take all reasonably practicable steps to ensure that disabled people are able to participate in its business and activities on an equal basis with people who are not disabled.

Last update: 17.07.23

Next routine update: 17.07.24 or sooner if required.