

POLICY STATEMENT POL02 EQUALITY AND DIVERSITY POLICY

The directors of the company acknowledge that in a diverse society, differences in background, circumstances and preferences can result in individuals or groups experiencing discriminatory behaviour or acts whether it is intended or not.

As an employer and service provider, the company is committed to creating an environment which is culturally sensitive, in which individuals do not feel discriminated against and where all individuals feel they are treated with respect and dignity. An environment in which employees are able to realise their full potential and contribute to the company's success and which delivers equitable services irrespective of ethnic or racial origin, religion or belief, gender and transgender, disability, sexual orientation, marital status, age or family circumstance.

The company is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes and expects employees to support this commitment and to assist in its realisation in all possible ways.

The company values the differences that a diverse workforce brings. This is a key employment value to which all employees are expected to respect and conform to.

Equal opportunities practice is developing constantly as social attitudes and legislation change. The company will keep its policies under review and will implement changes where these could improve equality of opportunity. This commitment applies to all the company's policies and procedures, not just those specifically connected with equal opportunities and diversity.

OUR COMMITMENT

- Promote the principles and practices of equality and diversity throughout the organisation
- Implement internal policies and procedures to ensure that employees are not discriminated against on the basis of ethnic or racial origin, religion or belief, gender and transgender, disability, sexual orientation, marital status, age or family circumstance.
- Monitor and evaluate policies and implement changes in order to improve them as social attitudes and legislation change
- Challenge and resolve all forms of unfair discrimination and harassment through existing procedures

PROMOTING EQUALITY AND DIVERSITY

The company is committed to promoting equality and diversity in the company as well as in those areas in which it has influence.

Employees will be trained on this Equal Opportunities and Diversity Policy and will be provided with equality and diversity training appropriate to their needs and responsibilities.

All those who act on the company's behalf will be trained on the company's Equality and Diversity Policy and will be expected to pay due regard to it when conducting business on the company's behalf.

The company will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities.

RESPONSIBILITY FOR IMPLEMENTING THE POLICY

Ultimate responsibility for implementing the policy rests with the directors of the company. The company will appoint a senior person within it to be responsible for the operation of the policy.

All employees of the company are expected to pay due regard to the provisions of the Equality and Diversity Policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the company.

Acts of discrimination or harassment and failure of employees of the company to comply with this policy will result in disciplinary action.

EMPLOYMENT AND TRAINING

As an employer, the company will treat all employees and job candidates equally and fairly and not discriminate unjustifiably against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment-related activities.

RECRUITMENT AND SELECTION

The company recognises the benefits of having a diverse workforce and will take steps to ensure that:

- It endeavours to recruit from the widest pool of qualified candidates possible
- Employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit
- Where appropriate, positive action measures are taken to attract applications from all sections of society and especially from those groups which are underrepresented in the workforce
- Selection criteria and processes do not discriminate unjustifiably on the grounds of gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or belief, other than in those instances where the company is exercising lawfully permitted positive action
- Wherever appropriate and necessary, lawful exemptions (Genuine Occupational Requirements) will be used to recruit suitable employees to meet the special needs of particular groups
- All recruitment agencies acting for the company are aware of its requirement not to discriminate and to act accordingly

CONDITIONS OF SERVICE

The company will treat all employees equally and create a working environment which is free from discrimination and harassment, which respects, where appropriate, the diverse backgrounds and beliefs of others.

Terms and conditions of service for employees will comply with UK equal opportunities legislation.

The provision of benefits such as working hours, maternity and other leave arrangements, performance appraisal systems, dress code, bonus schemes and any other conditions of employment will not discriminate unlawfully against any employee on the grounds of their gender, race (including colour, nationality, or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or

belief.

Where appropriate and necessary, the company will endeavour to provide appropriate facilities and conditions of service which consider the specific needs of employees which arise from their gender, ethnic or cultural background, nationality, responsibilities as parents or carers, disability, sexual orientation, marital status, part time status, age, religion or belief.

PROMOTION AND CAREER DEVELOPMENT

Promotion within the company will be made without reference to any of the forbidden grounds and will be based solely on merit.

The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unjustifiably discriminatory impact on any particular group.

Whilst positive action measures may be taken in accordance with relevant equal opportunities legislation to encourage underrepresented groups to apply for recruitment or promotion opportunities all jobs will be based solely on merit.

All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, the company will take appropriate positive action measures (as permitted by the equal opportunities legislation) to provide special training and support for groups which are underrepresented in the workforce and encourage them to take up training and career development opportunities.

RACE

It is recognised that ethnic minority groups face prejudice and discrimination which can disadvantage their ability to gain employment and access services.

The company is committed to encouraging social cohesion and positive relationships between people from different racial groups. The company will ensure equal rights to employment and appropriate and professional service provision.

RELIGION/BELIEF

Religious discrimination can occur when individuals or groups have differences in religious or philosophical beliefs, which can lead to an individual or group being treated less favourably because of that belief.

The company is committed to promoting mutual tolerance and respect within the working environment and communities that it serves.

GENDER

When an individual is treated unfairly because of their gender; women, men or transgender, or treated unfairly due to their marital status, this is unlawful discrimination.

The company supports all employees equally and endeavours that all individuals' knowledge, skills, talents and experience is utilised and rewarded irrespective of gender. The companies pay structure ensures that individuals receive equal pay for broadly the same work, for work regarded as equivalent and for work of equal value.

GENDER REASSIGNMENT

The protected characteristic of gender reassignment is defined as where a person has proposed, started or completed a process to change his or her sex. A transsexual person has the protected characteristic of

gender reassignment; a person is no longer required to be under medical supervision to be protected. The Act covers direct and indirect discrimination and harassment because of gender reassignment – whether it is perceived, actual or associated.

DISABILITY

Disabled people can experience discrimination and inequality in many circumstances and situations, including employment and appropriate access to services. The company is committed to ensuring equality of opportunity for disabled people.

AGE

Unlawful age discrimination happens when an individual of any age experiences unlawful treatment because of their age, without justification, or is harassed or victimised because of their age. The company provides equal opportunity for people of all ages.

SEXUAL ORIENTATION

The Equality Act (Sexual Orientation) Regulations 2007 prohibits discrimination on grounds of sexual orientation including treating any individual less favourably because:

- You are lesbian, gay, bisexual, asexual or straight
- People think you are lesbian, gay, bisexual, asexual or straight
- You are associated with someone who is lesbian, gay, bisexual, asexual or straight, for example a friend, relative or colleague

The law applies to direct and indirect discrimination as well as to harassment and victimisation in the private, public and not-for-profit sectors.

MARRIAGE AND CIVIL PARTNERSHIP

Under the Equality Act, marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'.

In relation to employment, if the protected characteristic is marriage and civil partnership, direct discrimination only covers less favourable treatment of a worker because the worker themselves is married or a civil partner.

Single people and people in relationships outside of marriage or civil partnership (whether or not they are cohabiting), are not protected from direct discrimination because of their status. There is no protection from direct discrimination by association or perception or harassment. However, harassment related to civil partnership could amount to harassment related to sexual orientation.

Benefits which are restricted on the basis of a worker's marital status are lawful under the Act, provided workers in a civil partnership have access to the same benefit. Workers who are not married or in a civil partnership can be excluded from such benefits.

PREGNANCY AND MATERNITY

The Act includes pregnancy and maternity as a protected characteristic. This protection is afforded to female employees during the period of pregnancy and any statutory maternity leave to which they are entitled. To claim pregnancy or maternity discrimination a female must show that she has been treated unfavourably because of her pregnancy or maternity.

HARASSMENT

We will seek to encourage an environment where individuals can work, free from the fear of discrimination and harassment; where all employees feel confident in reporting incidents of harassment in the knowledge that they will be dealt with effectively in accordance with the company's procedures.

Harassment is physical, verbal or non-verbal behaviour which is unwanted and personally offensive to the recipient, and which causes the recipient to feel threatened, humiliated, intimidated, patronised, denigrated, bullied, distressed or harassed.

THE WAY IN WHICH COMPLAINTS OF UNLAWFUL DISCRIMINATION AND HARASSMENT WILL BE HANDLED

Discrimination and harassment are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases, employees may be able to deal satisfactorily with an issue by raising it with their immediate manager.

If an employee wishes to make a formal complaint, they should use the company's Grievance Procedure which is set out in the Employee Handbook.

The company will treat seriously all allegations of unlawful discrimination or harassment.

IF AN EMPLOYEE IS ACCUSED OF UNLAWFUL DISCRIMINATION OR HARASSMENT

If an employee is accused of unlawful discrimination or harassment, the company will investigate the matter fully.

In the course of the investigation the employee will be given the opportunity to respond to the allegation and provide an explanation of their actions.

If the company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter.

If the company concludes that the claim is false or malicious the complainant may be subject to disciplinary action.

If on the other hand the company concludes that the employee's actions amount to unlawful discrimination or harassment, they may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

COMPLAINTS OF DISCRIMINATION

We will seek to encourage an environment where individuals can conduct their business free from the fear of discrimination and harassment, where all employees feel confident in reporting incidents of harassment, in the knowledge that they will be dealt with effectively in accordance with the company's procedures.

The company will treat seriously, and will act where appropriate, all complaints of discrimination or harassment on any of the forbidden grounds made by employees, clients, customers, suppliers, contractors or other third parties.

Any discriminatory behaviour will be addressed in accordance with this policy and existing disciplinary policy. All complaints will be investigated in accordance with the company's grievance or complaints procedure, as appropriate, and the complainant will be informed of the outcome.

MONITORING & REVIEW

The company will not tolerate unlawful discrimination or harassment of any kind in the working environment and will take positive action to prevent its occurrence.

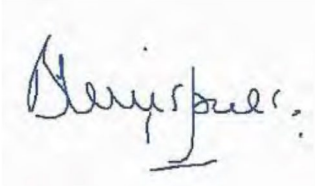
In this connection the company will monitor its policies and will implement changes to improve them as social attitudes and legislation change. This commitment applies to all the company's employment policies and procedures, not just those specifically concerned with equal opportunities and diversity.

The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality to all stakeholders, applicants and employees.

Monitoring may involve:-

- the collection and classification of information regarding the race in terms of ethnic/national origin and gender of all applicants and current employees
- the examination by ethnic/national origin and sex of the distribution of employees and the success rate of the applicants
- recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.

The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.



Bryan Lewis-Jones, Managing Director

1 March 2021