

EQUAL OPPORTUNITIES AND DIGNITY AT WORK POLICY

1. POLICY STATEMENT

The Company is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally. We aim to create a working environment that promotes dignity, respect, and fairness, where individual differences and the contributions of all staff are recognized and valued.

The Company will take all reasonable steps to employ, train, and promote employees on the basis of their experience, abilities, and qualifications without regard to any of the protected characteristics under the **UK Equality Act 2010**. These are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, and sexual orientation.

Proactive Preventative Duty: In strict compliance with the **Worker Protection (Amendment of Equality Act 2010) Act 2023**, the Company operates a zero-tolerance approach to sexual harassment and takes active, robust, and proactive measures to prevent sexual harassment of its workforce in the course of their employment, including harassment perpetrated by third parties.

The Company will not condone any form of discrimination, harassment, or bullying, whether engaged in by internal employees or by outside third parties who do business with the Company, such as clients, customers, contractors, and suppliers. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying, or intimidation. Serious breaches will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination or harassment.

2. SCOPE AND DEFINITIONS OF DISCRIMINATION

This policy applies to all aspects of employment with the Company, including recruitment, pay and benefits, terms and conditions of employment, training, promotion, performance management, discipline, and dismissal. It covers all forms of unlawful discrimination under UK law:

- **Direct Discrimination:** Treating someone less favourably than others because of a protected characteristic.
- **Indirect Discrimination:** Applying a provision, criterion, or practice (PCP) that puts individuals sharing a protected characteristic at a particular disadvantage, unless it can be objectively justified as a proportionate means of achieving a legitimate aim.
 - **Harassment:** Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.
- **Victimisation:** Treating someone less favourably because they have made or supported a complaint or raised a grievance under the Equality Act.

3. RECRUITMENT, ADVERTISING, AND SELECTION

The recruitment process will be conducted objectively and transparently to result in the selection of the most suitable person for the job in terms of relevant experience, abilities, and qualifications. The Company applies its equal opportunities principles at all stages of recruitment:

1. Job advertisements will be drafted carefully to avoid discriminatory criteria and will encourage applications from all suitably qualified and experienced people across all sections of the community.
2. Advertisements will not be confined to publications that would exclude or disproportionately reduce the numbers of applicants of a particular protected group.
3. Unnecessary criteria that could exclude disabled applicants or individuals belonging to specific demographic groups will be strictly avoided. Person specifications and job descriptions will be strictly limited to the operational requirements necessary for the effective performance of the job.
4. Where vacancies may be filled by internal promotion or transfer, opportunities will be published to all eligible employees in a non-restrictive manner.
5. Wherever possible, candidates will be interviewed by at least two interviewers using a standardized set of core questions directly related to job requirements.

With disabled job applicants, the Company complies fully with its legal duty to make **reasonable adjustments** to recruitment arrangements, criteria, practices, or premises to ensure that disabled individuals are not placed at a substantial disadvantage compared to non-disabled applicants.

4. TRAINING AND PROMOTION

The Company will regularly train all line managers on equal opportunities and dignity at work, equipping them to actively promote fairness and confidently identify, report, and manage discriminatory acts, harassment, or bullying. Line managers bear explicit responsibility for fostering an inclusive culture within their respective departments.

All employees will receive mandatory training to understand their workplace rights and operational responsibilities. Where promotion systems are in operation, they will be checked periodically for bias. If any particular group appears underrepresented or excluded from progression, the criteria will be comprehensively reviewed to ensure no indirect barriers or unlawful discrimination exist.

5. TERMS OF EMPLOYMENT, BENEFITS, FACILITIES, AND SERVICES

All contractual terms, benefits, workspace facilities, and operational services will be regularly audited to ensure complete compliance with equality legislation. The Company will proactively adjust standard working practices to overcome barriers caused by disability or to accommodate legitimate cultural or religious needs, provided such modifications do not compromise core operational viability.

6. EQUAL PAY

The Company is fully committed to the principle of equal pay for equal work in accordance with Chapter 3 of the Equality Act 2010. We ensure that male and female employees receive equal pay for like work, work rated as equivalent, or work of equal value. To ensure compliance, the Company maintains a transparent, objective, and unbiased pay and grading framework.

7. BULLYING AND HARASSMENT

Bullying is defined as offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient.

Harassment occurs where a person engages in unwanted conduct related to a protected characteristic that has the purpose or effect of violating an employee's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Under UK law, conduct shall be regarded as having this effect if, taking into account the perception of the recipient and all circumstances, it is reasonable for it to have that effect, even if the impact was unintended.

Sexual Harassment: This constitutes any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature. In line with updated UK compliance duties, the Company implements a zero-tolerance structure and actively assesses risks to prevent any such conduct. Conduct intended as a "joke" or "office banter" can still legally constitute harassment if it meets the criteria outlined above.

Examples of unacceptable behaviour include, but are not limited to:

- Unwelcome sexual advances, requests for sexual favours, or explicit conduct of a sexual nature.
- Obscene, suggestive, racist, or discriminatory comments, jokes, or physical gestures.
- Promising operational rewards for submission to sexual advances or making threats following a rejection.
- Demeaning, critical, or mocking comments regarding an individual's appearance, dress, or physical attributes.
- Invasive questioning regarding an individual's sex life, orientation, or private relationship status.
- The offensive use of nicknames or slurs tied to any protected characteristic.
- Deliberate isolation, social exclusion, or withholding of relevant work-related information.

8. REPORTING AND GRIEVANCE PROCEDURES

All allegations of discrimination, bullying, or harassment will be treated with absolute seriousness, strict confidentiality, and professional urgency. The Company will thoroughly investigate every formal or informal complaint raised by staff:

1. **Reporting:** Incidents should be reported promptly to your immediate line manager. If you prefer not to discuss the matter with your line manager, you may report it directly to an alternative department manager or directly to the Human Resources Department.
2. **Investigation:** All complaints will be formally investigated in an objective, unbiased manner. The complainant will be interviewed and requested to provide a signed statement. To ensure natural justice, the identity of the complainant and the substance of the allegations will be shared with the alleged harasser so they can respond fairly.

3. **Outcome:** Following completion of the investigation, the company will deliver its findings and conclusions in writing to both parties. If the complaint is upheld, prompt disciplinary action will be taken up to and including summary dismissal.
4. **Protection:** No employee will be penalized, victimized, or retaliated against for raising a good faith complaint under this policy, regardless of whether the complaint is ultimately upheld. Malicious or deliberately false allegations made in bad faith will, however, be treated as serious disciplinary matters.

9. MONITORING AND POLICY REVIEW

The Company will regularly monitor the demographic effects of selection choices, recruitment trends, and pay distribution. This monitoring process evaluates whether equal opportunity is being robustly achieved in practice and flags potential patterns of indirect discrimination. This policy will be reviewed annually or in response to structural changes in UK employment law.

Approved By: Director

Date: 10 March 2026

Signature: 