

Equal Opportunities & Diversity Policy

POLICY STATEMENT

We are fully committed to providing equal opportunities for all employees, workers and job applicants, and to eliminating unlawful and unfair discrimination as governed by the Equality Act 2010. We aim to create

a culture that encourages and values diversity, and that appoints, rewards and promotes staff based on merit.

We 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.

Equally, we will not treat any employee, worker or job applicant less favourably because:

- they are (or are not) a trade union member;
- they work part-time or on a fixed-term basis;
- of their socio-economic background; or
- they have caring responsibilities.

INTRODUCTION

The policy statement above sets out our commitment to ensuring that all staff and job applicants have equal opportunities. The remainder of this document sets out our policy on equality and diversity, in particular:

- what we regard 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 we will deal with any breach of this policy;
- who is responsible for the policy; and
- how it will be implemented, monitored and reviewed.

SCOPE

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, 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 customers, suppliers, business partners and visitors. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

EQUALITY PRINCIPLES AND IMPLEMENTATION

As set out in the policy statement, there should be no discrimination because of any of the protected characteristics or other factors. The types of discrimination that are prohibited are explained below. Discrimination may occur in the following forms:

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. Such treatment is unlawful unless, in relation to age only, it can be objectively justified, i.e. the employer can show that it is a proportionate means of achieving a legitimate aim.

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.

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 an employee claiming that they had been discriminated against, who is then refused a reference by their manager because of that claim.

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. More information on what can constitute harassment is set out in our harassment and bullying policy.

Discrimination Arising from Disability (in the case of disability only)

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.

The Duty to make Reasonable Adjustments (in the case of disability only)

This duty comprises three requirements, each of which arises where a disabled person is 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.
- (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.

We will appoint, train, develop, reward and promote on the basis of merit and ability.

The principles set out in this policy apply in the workplace and outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events and at any time while you are wearing a work uniform.

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

The Commercial Director, John Downes will be responsible for this policy, its implementation, monitoring and review.

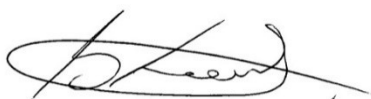
If you have any doubt or concern about this policy, or how it should be applied in any particular instance or situation, please contact your line manager as soon as possible.

If you believe you have been unfairly treated in breach of this policy, you should follow our grievance procedure. The harassment complaints procedure set out in our harassment and bullying policy is also available if you believe that you may have been harassed or bullied. You will not be victimised 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.

We will not tolerate behaviour that goes against this policy, and where you are alleged to have breached this policy, you will be subject to our disciplinary procedure.

Disciplinary action will be taken if you are 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.

Signed

A handwritten signature in black ink, appearing to read 'Bridget Ferrington', with a long horizontal stroke extending to the right.

Bridget Ferrington

Managing Director

3rd January 2026