

## HR03 – Equal Opportunities Policy

### Line Manager Responsibility

- Ensure that they manage employees fairly and equally in all areas of employment.
- Develop and encouraging a positive working environment and team working between staff.
- Take responsibility for any situation they see that involves any form of discrimination or harassment and seek advice from HR.
- Ensure that all employees are aware of the Company's legal obligations and internal procedures relating to the provision of Equal Opportunities.

### HR Responsibility

- HR will provide managers with advice and support to ensure that they are aware of their obligations to the above policy.
- Investigate all complaints of discrimination or harassment with the appropriate line manager.
- HR will review all other employment policies to ensure they comply with the spirit and practice of Equal Opportunities.

### Policy

It is the responsibility of the Chief Executive Officer (CEO) of the Company to ensure that this policy is complied with and is effectively implemented.

The Company is committed to providing equal opportunities in employment and to avoid unlawful discrimination in employment or to customers. The Company has a commitment to observe as far as possible the Human Rights Act 1998, the Equality Act 2010 and the Equality and Human Rights Commission – Code of Practice on Employment and Code of Practice on Race Equality in Employment

This policy is intended to assist the company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination. Any breaches of this policy will result in disciplinary action being taken.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The Company has a separate *Bullying and Harassment Policy* which deals with these issues.

It is unlawful to discriminate directly or indirectly in recruitment or employment on grounds of age, sex (including gender reassignment), pregnancy, colour, race, nationality, ethnic or national origins, sexual orientation, religion or belief, because someone is married or is a civil partner. It is unlawful to treat someone less favourably on grounds of disability than others without that disability are or would be treated, unless the less favourable treatment can be justified, or to fail to make reasonable adjustments to overcome barriers to employment caused by disability.

It is firmly opposed to any form of discrimination based on these human attributes and values and will ensure that the equal opportunity requirements of all relevant current legislative acts are implemented within its operating procedures.

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It is unlawful to victimise someone because he or she has alleged unlawful discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

It is firmly opposed to any form of discrimination based on these human attributes and values and will ensure that the equal opportunity requirements of all relevant current legislative acts are implemented within its operating procedures.

### **Definitions**

#### **Direct Discrimination**

This is where a person is treated less favourably than another in comparable circumstances on a prohibited ground. An example of direct sex discrimination would be refusing to employ a woman because she was pregnant. Unlike the other forms of discrimination, direct discrimination on the grounds of age can be justified.

#### **Indirect Discrimination**

Indirect discrimination is where a provision, criterion or practice is applied which is such that it would be to the detriment of a considerably larger proportion of the relevant group to which the individual belongs than to others, which is not objectively justifiable and which is to the individual's detriment. For example, an employer has a policy of not letting anyone work part-time, this is indirect discrimination as those employees with children or family responsibilities could be disadvantaged.

#### **Procedure**

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The company is committed to ensuring that we recruit, train and retain the best people for each job. We consider the qualities that are required for each job and the ability of the person to fulfil them.

#### **Grievances**

If you consider that you may have been unlawfully discriminated against or subjected to bullying or harassment, you may use the Company's *Grievance Policy* to make a complaint.

The Company will take any complaint seriously and will seek to resolve any grievance which it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

#### **Monitoring and review**

This policy will be monitored regularly by the Company to judge its effectiveness and will be updated in accordance with changes in the law.

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### Revision of Policy

The Company reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law; best practice and/or business requirements.

Signed:



Nicolas Detchepare  
Chief Executive Officer

Dated: June 2021