

### 1. Equal Opportunities Statement

- 1.1 The Company is committed to promoting equal opportunities in employment. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (“Protected Characteristics”).

### 2. About This Policy

- 2.1 This Policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 2.2 The Group Chief Executive Officer is responsible for this Policy and any necessary training on equal opportunities.
- 2.3 All directors and managers have day to day responsibility of ensuring that their staff are aware of this policy and that all reasonable and practical steps are to operate within it.

### 3. Monitoring

- 3.1 The Company operates a monitoring system which measures the effectiveness of this Policy.
- 3.2 The system will involve the routine collection and analysis of data from staff including but not limited to their gender, marital status, ethnicity, sexual orientation, religion/beliefs, grade and length of service.
- 3.3 The system will also measure internal promotion rates and access to training and development opportunities across the business.
- 3.4 Where appropriate Equality Impact Assessments will be carried out using the results collated from any monitoring systems to ascertain the effect of this policy on staff, third party companies and customers.
- 3.5 If the results of the Equality Impact Assessments indicate that the Company is not applying this Policy effectively across the business, a report will be produced detailing any the action that the Company is recommended to take. Such action could include the review of the recruitments and selection procedures, all Company policies and any Company procedures.
- 3.6 The information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose or passed on to third parties.

### 4. Training

- 4.1 The company takes equal opportunities training very seriously and is committed to delivering regular training to all staff.
- 4.2 All managers involved in the recruitment and selection process will receive specialist training.

### 5. Discrimination

- 5.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related) and on work-related trips or events including social events.

- 5.2 The following forms of discrimination are prohibited under this Policy and are unlawful:
- (a) Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
  - (b) Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
  - (c) Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Harassment and Bullying Policy.
  - (d) Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
  - (e) Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### 6. Recruitment and Selection

- 6.1 Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.
- 6.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- 6.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 6.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

### 7. Disabilities

- 7.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

### 8. Part-Time and Fixed-Term Work

- 8.1 Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

### 9. Breaches of this Policy

- 9.1 We take a strict approach to breaches of this Policy, which will be dealt with in accordance with our Disciplinary Policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- 9.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Policy or Anti- harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.
- 9.3 You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Policy.

**Michael McDonnell**  
**Group Chief Operating Officer**