

1. Policy Statement

- 1.1 The Company is committed to promoting equality of opportunity for all staff, job applicants and others that we deal with. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.
- 1.2 We do not discriminate against staff or third parties on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, maternity or pregnancy, race, colour, nationality, ethnic or national origin, religion or belief, disability, age, union activities or union membership / non-membership ("the protected characteristics").
- 1.3 The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, customers, suppliers, and former staff members.
- 1.4 All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to our separate Anti-harassment policy.
- 1.5 This policy does not form part of the terms and conditions of employment of any employee and the Company reserves the right to depart from the precise requirements of it where it is expedient to do so, and the resulting treatment of any employee is no less fair. However, any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action (see clause 12.3 below).

2. Who is covered by the policy?

This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term employees, casual workers, and agency staff (collectively referred to as "staff" in this policy).

3. Who is responsible for this policy?

- 3.1 The management team has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility of this policy has been delegated to Ramin Sadeghi.
- 3.2 All managers must set an appropriate standard of behaviour, led by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.
- 3.1.1 If you have any questions about the content or application of this policy, you should contact HR Department.

4. Scope and purpose of the policy

- 4.1 This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes in relation to job advertisements; recruitment, selection or otherwise appointment; training and development; opportunities for promotion; conditions of engagement; pay and benefits; conduct at work; disciplinary and grievance procedures; and termination of employment or other engagements.
- 4.2 We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

5. Forms of discrimination

- 5.1 Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

- 5.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics. For example, rejecting an applicant for a job on the grounds of their race because they would not "fit in" would be direct discrimination.
- 5.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.
- 5.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that 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 Anti-harassment Policy.
- 5.5 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.
- 5.6 Discrimination might occur not only for a reason related to a person having a protected characteristic, but because of their association with someone with a protected characteristic. For example, if a person is refused a promotion because they care for somebody with a disability, this would be direct discrimination even though the employee in question is not disabled him or herself.
- 5.7 Discrimination might occur because somebody is perceived to have a protected characteristic when, in fact, they do not. For example, an employee might be subjected to harassment because he is thought to be gay when, in fact, he is not gay.

6. Recruitment and selection

- 6.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.
- 6.2 Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include an appropriate short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.
- 6.3 We take steps to ensure that our vacancies are advertised to a diverse labour market.
- 6.4 Applicants should not be asked about health or disability before a job offer is made unless Human Resources is satisfied that the questions are:
- (a) necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - (b) to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - (c) for the purposes of equal opportunities monitoring (which will not form part of the decision-making process).
- 6.5 Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment.
- 6.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to

satisfy current immigration legislation. The list of acceptable documents is available from Human Resources or the UK Border Agency.

6.7 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

7. Staff training and promotion and conditions of service

7.1 Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

7.2 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

8. Termination of employment

8.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

8.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal, or other disciplinary action.

9. Disability discrimination

9.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

9.2 For the purposes of this policy, you will be disabled if you have:

- (a) been diagnosed with cancer, HIV or multiple sclerosis or are certified or registered as blind or partially sighted; or otherwise
- (b) a physical or mental impairment that has a more than negligible adverse effect upon your ability to carry out normal day-to-day activities, which has lasted, or might well last, for more than a year, or recur over a period in excess of a year.

9.3 If you have a disability, Human Resources will discuss with you whether you are able to fulfil your normal duties and whether there are any adjustments that could reasonably be made to your job or working environment to enable you to carry out your duties effectively and participate generally in the business on an equal basis with people who are not disabled.

9.4 We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants, clients and other visitors at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

9.5 In addition to disabled persons being protected against direct and indirect discrimination by reason of disability and our obligation to consider reasonable adjustments as outlined above, disabled workers must not be subjected to any less favourable treatment for a reason relating to their disability unless this can be objectively justified.

9.6 We encourage workers, job applicants, clients, and other visitors to our premises to notify us of any disabilities in order that we may consider our obligations to them.

9.7 We may ask a doctor appointed by us to advise on the above matters.

10. Fixed-term employees

We monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion, and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

11. Part-time work

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately and that, where applicable, the legislation relating to flexible working requests is complied with.

12. Breaches of this policy

12.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

12.2 If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Anti-harassment Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.

12.3 There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

13. Monitoring and review of the policy

13.1 This policy is reviewed periodically by the Board.

13.2 We will continue to review the effectiveness of this policy to ensure it is achieving its objectives.

13.3 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting HR Department.