
EQUALITY, DIVERSITY AND INCLUSION POLICY STATEMENT

Our Policy

We aim to be an equal opportunities employer in all respects and in compliance with the Equality Act 2010. No job applicant, employee or worker will receive less favourable treatment in terms of direct or indirect discrimination, harassment, or victimisation on the grounds of the nine protected characteristics as defined by the Equality Act 2010.

The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity. The policy of non-discrimination will also apply to membership or non-membership of trade union and "spent convictions" of ex-offenders.

All employees, whether part time, full time or temporary, will be treated fairly and equally.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our Commitment:

We will follow the recommendations and Codes of Practice of the Equality and Human Rights Commission, embracing those previously provided by the Commission for Racial Equality, the Equal Opportunities Commission and the Disability Rights Commission.

Assessment and consideration of job applicants, employees and workers will be based on objective and relevant criteria. Selection criteria and procedures will be reviewed to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities.

We will ensure that we apply the Equality, Diversity & Inclusion Policy in a fair and consistent manner to our recruitment practices. This will include open recruitment methods, which provide the opportunity for all potential candidates to apply without discrimination or restriction. This will include sources such as press advertising, recruitment agencies, job centres, the careers' service, etc. All recruitment advertisements will be vetted prior to issue to ensure that they do not include anything which may be considered discriminatory in either words or images.

We will review the Equality, Diversity & Inclusion Policy and other company recruitment and selection practices at regular intervals to ensure full compliance with Statutory Codes of Practice.

All employees, as part of their induction training to the Company will be made familiar with the Company's Equality, Diversity & Inclusion Policy.

All employees will be given an equal opportunity and, where appropriate and possible, special training to enable them to progress within the Company. The Company is committed to a programme of action to make this policy effective, to minimise the possibility of discrimination and find means of combating it whenever it arises.

Implementation

Employer's Responsibility

In order for the Equality, Diversity & Inclusion Policy to be fully effective, the responsibility for ensuring that its terms are adhered to will lie with the Directors. It is, however, the responsibility of each manager and all other supervisory staff to actively promote equality of opportunity within their own spheres of responsibility. It should not be overlooked that harassment can take many forms and may relate to any of the protected characteristics. It could occur either from those within the Company or from a third party. Victimisation in the widest sense of the word is also a form of harassment and those exposed to or subject to such action need protection. If a manager or supervisor identifies any form of discrimination, harassment or victimisation they should take immediate steps to investigate the matter and take appropriate action, regardless of whether or not a formal complaint has been made.

The Company will inform its employees of their responsibilities and opportunities under the Equality Act and will make sure that the Company's Equality, Diversity & Inclusion Policy is known to all staff and applicants. All new staff will receive copies of the policies which are contained in the Employee Handbook. The Employee Handbook containing these policies is provided for all employees and the Company encourages an open and consultative approach with all staff in order that views may be expressed, feedback obtained such that the effectiveness of the policy may be monitored and assessed. The Company will also make contractors and clients aware of the Equality, Diversity & Inclusion Policy through provision of appropriate documentation.

When making decisions on promotions and career development, managers should focus on employees as individuals, with particular talents and experiences, rather than make assumptions based on their race, gender, marital status, or disability etc. Where, for example, jobs have been undertaken mainly by one gender or race in the past, efforts should be made to encourage others to apply for these posts alongside other applicants.

The role of training is to improve performance in the job, to develop skills, and to prepare individuals for other roles and responsibilities. As with promotion and career development, managers should focus on the development needs of individuals.

All training materials should be checked to ensure that the language and images used in them reflect the diversity of our employees and customers.

The Company will take disciplinary action against employees who are found to infringe the Equality, Diversity & Inclusion Policy. The Company will also take all reasonable steps as a result of a complaint of third party harassment to ensure there is no re-occurrence.

It is the Company's policy:

- To value diversity in society and in our workforce as a means of broadening the Company's talent base, achieving the highest levels of performance, and enabling all employees to reach their full potential.
- To identify the various behaviours and barriers that discrimination can take, and understand the negative effect these can have on the Company and its employees *and* customers.
- To ensure we comply with the Equality, Diversity & Inclusion Policy, and work towards eliminating any discriminatory practices which may be limiting the Company's ability to achieve its objectives, thereby maintaining our reputation as a fair and responsible employer in the eyes of the Company's employees, customers, other stakeholders and the public at large.

Employee Responsibility

While the main responsibility for providing equal opportunities lies with the Company, individual employees at all levels have responsibilities too. Eradicating discrimination depends on everyone's collaboration.

Employees must not harass, victimise, abuse or intimidate other employees on any grounds.

Employees should co-operate with measures introduced by the Company to make sure there is equal opportunity and non-discrimination. Employees must not victimise individuals on the grounds that they have made complaints or provided information about discrimination or harassment.

It is the employee's responsibility:

- To be aware of the various behaviours and barriers that discrimination can take, and understand the negative impact these can have on the Company, its customers and colleagues.
- To be sensitive to the potential impact of your own behaviour on colleagues, customers and job applicants.
- To co-operate with management in the elimination of any discriminatory practices which may be identified.

What is meant by 'Managing Diversity'?

'Managing personal benefits that accrue from valuing the differences between people, rather than just complying with the law. Organisations that grasp Diversity' is a more effective way of dealing with equal opportunities issues. It emphasises the business and the additional business opportunities generated by managing diversity effectively are far more likely to enjoy sustained competitive advantage than those who do not.

Why is it important?

It is essential that we attract and retain the most talented people to continue to compete successfully in our market. Skills and ability are not, for example, the preserve of one particular ethnic group or one gender; by recognising this we can widen our recruitment pool and maximise the potential of our existing employees.

We are committed to providing service excellence to all our customers and we believe that a workforce that values and reflects the diversity of our society can better achieve this.

The UK is an increasingly diverse society. In order to enhance business opportunities we should reflect and value that diversity in our advertising, marketing and sales strategies.

It has been established that employee motivation and commitment increase if people feel valued and perceive that they are being treated fairly. Evidence from a range of sources also indicates that diversity results in more creativity and higher productivity.

Finally, but not least, there are a number of laws that set out how employers and individuals should act. including the: Equal Pay Act 1970; Sex Discrimination Act 1975 (Amendment). Regulations 2008; Race Relations Amendment Regulations 2003 (including the Race Relations Code of Practice) and the Equality Act 2010 which replaced most of the Disability Discrimination Act (DDA) 1995. However, the Disability Equality Duty in the DDA continues to apply.

Grievance and Discipline

If any employee believes that they have been unfairly discriminated against they should make a complaint using the Company's Grievance Procedure.

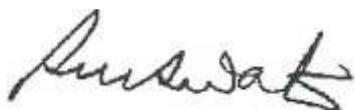
Likewise, any employee is found to have breached the Company's Equality, Diversity & Inclusion Policy may be subject to disciplinary action under the Company's Disciplinary Procedure, which in serious cases may result in dismissal.

Who is Responsible?

Accountability for the Company Equality, Diversity & Inclusion Policy lies with the Directors. However, responsibility for implementing the Policy lies with the management team. Ultimately, a successful Equality, Diversity & Inclusion Policy requires the genuine commitment of all employees.

How will the Policy be implemented?

The Company Equality, Diversity & Inclusion Policy provides a framework and creates a minimum standard for all activities within the Company. However, as the Company operates a wide range of activities at numerous different geographical locations and the business operates within its own unique environment, it may face different circumstances and business issues. In this context it is for each area of the business to decide its own priorities and strategies for implementing the Policy. Each year a review will be undertaken of each of the business areas within the Company on the actions they have taken to implement the Equality, Diversity & Inclusion Policy in their areas.

**P Watson, Managing Director**1st January 2021