

EC-HR-POL-003

1. EQUAL OPPORTUNITIES DIVERSITY AND INCLUSION STATEMENT

We are committed to promoting equal opportunities, diversity and inclusion 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. We strive to create a diverse working culture and an open mindset which is inclusive and will help us grow our business and attract, develop and retain the best and talented employees. We want all employees to feel respected, valued and supported.

Mutual respect is the prerequisite for a working atmosphere based on trust in which all employees can assume responsibility, fulfil their potential and deliver optimal performance.

The purpose of this policy is to set out our approach to equal opportunities, diversity and inclusion and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, performance review, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

We are committed to continuous improvement and we may review and amend this policy at any time. This policy should be read with the Code of Business Conduct and Ethics and Compliance Charter. This policy applies to all employees, officers, consultants, contractors, volunteers, interns, temporary and agency workers.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. We want to ensure that our decisionmakers are equipped to make decisions that are transparent, objective, fair and free from prejudice.

2. **DISCRIMINATION**

We commit to treating our workforce fairly and without discrimination. 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 contacts or when wearing a work uniform), and on work-related trips or events including social events.

3. **RECRUITMENT AND SELECTION**

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 and with the involvement of the HR Department, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

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.



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Job applicants should not be asked questions which might suggest an intention to discriminate. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There may be limited exceptions to this rule only whenever the job in question requires, because of the nature of the duties connected to it, a certain level of health and fitness in the assigned employee. Such exceptions should only be used with the approval of the HR Department.

Where required by law we will ask questions and require the production of applicable documents to ensure that all employees are entitled to work in the applicable jurisdiction. Assumptions about immigration status should not be made based on appearance or apparent nationality.

4. TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

Training needs will be identified through regular discussions appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

We are committed to building a working environment that enables the full participation of all and enables all employees to reach their full potential.

5. **TERMINATION OF EMPLOYMENT**

We will ensure that redundancy criteria and procedures are fair and objective and are not discriminatory.

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

6. **DISABILITIES**

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

If you experience difficulties at work because of your disability, you may wish to contact the HR Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.



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7. **PART-TIME AND FIXED-TERM WORK**

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

8. SPEAKING OPENLY

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 result in dismissal.

We want you to be able to speak openly about any concerns about possible breaches of this policy. If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

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.