

Equality and Diversity Policy

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2. Introduction

2.1 Eumar Technology Limited (ETL) are committed to equality of opportunity as an employer and to following business practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or employee receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

2.2 We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees are covered by this policy, and it applies to all areas of employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.

2.3 All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be based on 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 Company.

2.4 Equality of opportunity, valuing diversity and compliance with the law (*Equality Act 2010*) is to the benefit of all individuals in the Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers, individuals at all levels have a responsibility to treat others with dignity and respect. The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Company.

3. Our Commitment as an Employer

ETL is committed to:

3.1 creating an environment in which individual differences and the contributions of our employees are recognised and valued.

3.2 every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all: no form of intimidation, bullying or harassment will be tolerated.

3.3 providing training, development and progression opportunities to all employees.

3.4 understanding equality in the workplace is good management practice and makes sound business sense; and

3.5 reviewing all our employment practices and procedures to ensure fairness.

4. Equality Opportunity Policy Statement

4.1 We will ensure that:

4.1.1 all people are treated with respect and dignity regardless of any protected characteristic.

4.1.2 discriminatory assumptions are challenged.

4.1.3 people are given equal access to employment, training, development and promotion opportunities regardless of any protected characteristic.

4.1.4 reasonable adjustments are provided to ensure disabled people have access to employment opportunities.

4.1.5 we respond swiftly and sensitively to any discriminatory incident.

4.1.6 we respect people's beliefs (where the expression of those beliefs does not impinge on the legitimate rights of others).

4.2 **Ex-offenders:** We will prevent discrimination against our employees regardless of their offending background.

4.3 **Equal pay:** We will ensure that all employees, male or female, have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

5. Definitions of Unlawful Discrimination

5.1 **Direct Discrimination** occurs where someone is treated less favourably than others because of:

5.1.1 a protected characteristic they possess.

5.1.2 a protected characteristic of someone they are associated with, such as a friend, family member or colleague – this is direct discrimination by association; and/or a protected characteristic they are thought to have, regardless of whether this perception by others is correct or not – this is discrimination by perception.

5.2 **Indirect Discrimination** is usually less obvious and is normally unintended. In law, it is where a 'provision, criterion or practice' has (or will have) the effect of putting those with a protected characteristic at a particular disadvantage without justification. For example, this may arise from a policy, rule or management action.

5.3 **Harassment** is where there is unwanted conduct, related to one of the protected characteristics that has the purpose or effect of violating a person's dignity: or creating an intimidating, hostile, degrading, humiliating or creating an offensive environment for them. It does not matter whether this effect was intended by the person responsible for the conduct.

5.4 **Victimisation** occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they made or supported a complaint

raised under this policy, or was suspected of doing so. However, an employee is not protected from victimisation if they have acted maliciously. e.g. they deliberately gave false evidence; this is a malicious act.

5.5 Failure to make reasonable adjustments is where a physical feature or a practice puts a disabled employee at a substantial disadvantage compared with non-disabled employees and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

6. Employees' Responsibilities

6.1 Every employee is required to assist ETL to meet its commitment to provide equal opportunities and avoid unlawful discrimination.

6.2 Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

6.3 Acts of discrimination, harassment, bullying or victimisation against employees, customers or visitors are disciplinary offences and will be dealt with under ETL's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

7. Customers, Suppliers and Other People Not Employed by the Company

7.1 ETL will not discriminate unlawfully against customers, suppliers, visitors or other people connected with the Company. Employees should report any behaviour that might constitute bullying or harassment from customers, suppliers, visitors or others to their manager who will take appropriate action.

8. Grievances

8.1 If you consider that you may have been unlawfully discriminated against or bullied, you may use the Company's grievance procedure to make a complaint.

8.2 ETL will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is made in bad faith.

9. Creating Equal Opportunities in the Workplace

9.1 There are several ways in which ETL aims to ensure equal opportunities in the workplace, including:

9.1.1 Recruitment and selection - Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable job-related criteria. Decisions regarding an individual's suitability for a particular role will be based on aptitude and ability. We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not substantially disadvantaged.

- 9.1.2 Career development and training – all employees will be given an appropriate induction to enable them to fulfil the responsibilities of their role. All employees will be encouraged to develop their full potential, and we will not unreasonably deny an employee access to training or other career development opportunities. These will be identified as part of an ongoing performance management process and will be determined objectively, considering the needs of the business and available resources. Selection for promotion will be based on objective criteria and decisions will be made based on merit.
- 9.1.3 Terms and conditions - our terms and conditions of service will be applied fairly, and benefits and facilities will be made available to all employees who should have access to them, as appropriate. ETL operates a pay and benefits system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution. Terms and conditions of employment for part-time employees will be provided on a pro-rata basis to full-time employees. Similarly, the terms and conditions for fixed term employees will be comparable with those given to permanent employees, except when different treatment can be objectively justified.
- 9.1.4 Working environment - all individuals have a right to be treated with dignity and respect and ETL takes reasonable steps to protect staff from discrimination, bullying or harassment and, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence. All employees are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during the course of employment, on or off premises, including at work social events (whether organised by the Company or not) or at formal or informal events involving employees, clients or other work-related contacts.

10. Data Protection

10.1 ETL treats personal data collected for reviewing equality of opportunity in recruitment and selection and employment in accordance with its Data Protection Policy. Information about how data is used and the basis for processing is provided in the Company's Privacy Notice.

11. Review

11.1 This policy will be reviewed, at least annually, and will be updated in accordance with any changes in the law.

Last Reviewed 02 Oct 2025

Next Review 02 Oct 2026