

# POL056 Diversity & Equal Opportunities Policy

The Exponential-e group of companies is committed to providing equal opportunities in employment and treating all employees with respect and dignity. The group respects and values the diversity of its staff, striving to maintain an environment where there is opportunity for everyone to feel valued, their talents to be utilised and for both personal and organisational aspirations to be met. Every employee plays a vital role in helping to create an inclusive working environment by understanding and harnessing difference in a positive way.

### What the Law says

It is unlawful to discriminate directly or indirectly in recruitment or employment on grounds of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as protected characteristics.

It is unlawful to directly discriminate or harass an individual based on the perception that they have a protected characteristic or because they associate with another individual who has a protected characteristic (with the exception of marriage and civil partnership, and pregnancy and maternity).

It is unlawful to fail to make reasonable adjustments to overcome barriers to employment caused by disability.

It is unlawful to subject an individual to detrimental treatment because he/she has made or supported a complaint or grievance, or because he/ she is suspected of doing so, or about to do so.

It is also unlawful to discriminate directly or indirectly or harass customers or clients because of their protected characteristics in the provision of goods and services.

#### Our responsibilities

The company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, training opportunities, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Any decisions concerning employment, promotion and training will be based on objective, job-related criteria and merit. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

The company will comply with its obligations in relation to statutory requests for contract variations and will make all reasonable adjustments to our standard working practices to overcome barriers caused by disability. When considering requests for variations to our standard working practices we will consider whether they have the potential to indirectly discriminate and will only refuse this kind of request if we have good reason that is unrelated to any prohibited grounds of discrimination.

The company will monitor the ethnic, gender and age composition of the existing workforce and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.



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### **Employee responsibilities**

Everyone should assist the company in meeting our commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, the company for any act of unlawful discrimination. Acts of discrimination, harassment or victimisation against others are disciplinary offences and will be dealt with under our discipline and appeals procedure. Such acts may constitute gross misconduct and could lead to a summary dismissal.

If an employee feels that they may have been unlawfully discriminated against, they may use the company's grievance procedure to make a complaint. The company will take any complaint seriously and will seek to resolve any grievance that it upholds. An employee will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is both untrue and made in bad faith.

### **Bullying and Harassment**

Bullying and harassment of any kind is a serious issue, which can affect people's health, work performance, promotion and job prospects and learning and achievement. Exponential-e is committed to eliminating all forms of intimidation, bullying or harassment.

Harassment is defined as 'unwanted conduct related to a relevant protected characteristic (age, disability, sex, gender reassignment, race, sexual orientation, religion or belief) which has the purpose or effect of violating an individual's dignity or creating and intimidating hostile, degrading, humiliating or offensive environment for that individual'.

Bullying is not specifically defined in law, can be defined as 'offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine humiliate, denigrate or injure the recipient'.

Bullying and harassment can take many forms, with or without witnesses and be persistent behaviour or a one off act including:

- Physical Unnecessary/ unwelcome physical contact, threatening gestures or any other intimidating behaviour
- Verbal Spoken, textual or pictorial words or images which are threatening, defamatory, humiliating, ridiculing, sexually suggestive, racially offensive including malicious gossip and jokes, unjustified criticism or any other unwelcome remark about a person's age, dress, appearance, race or marital status.
- Non-verbal isolation, exclusion, segregation or non-cooperation, abuse of power, removal
  of responsibility, intrusion by spying or stalking behaviour which undermines confidence or
  unfair sanctions

It is not the intention of the perpetrator of the bullying or harassment that is of primary concern; but rather the conduct itself and its impact on the recipients which constitutes bullying and harassment.

Bullying and harassment are not tolerated in our workplace and all employees are required to treat each other, along with customers, suppliers and visitors with dignity and respect.



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All managers and supervisors are responsible for eliminating any bullying or harassment of which they are aware. This not only includes employees but also third parties such as customers, suppliers and visitors. Failure to take action will be treated as a failure to fulfil their responsibilities.

Employees may, if they wish, discuss any concerns with their line manager or a member of the HR team on a confidential and informal basis. If the problem persists, employees are encouraged to follow the company's grievance procedure. Acts of bullying or harassment against others are disciplinary offences and will be dealt with under our discipline and appeals procedure.

This policy covers behaviour which occurs in the workplace or out of the workplace, including on work trips and at work-related events or social functions. If the company's reputation is affected the board of directors will take firm action.

Signed: Peter Clapton, CEO

Date: 3 January 2023