

Equal Opportunities and Diversity Policy

We are proud to regard ourselves as an equal opportunity employer, creating an inclusive environment in which we are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no person receives less favourable treatment or is excluded 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.

The terms equality, inclusion, diversity and equity are at the heart of this policy. **'Equality'** means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. **'Inclusion'** means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. **'Diversity'** means the celebration of individual differences amongst the workforce. **'Equity'** means recognising barriers and that some groups are more advantaged than others, and putting measures in place to eliminate these barriers, ensuring equal opportunities for all. We will actively support and embrace diversity, equity and inclusion to ensure that our workforce is valued and treated with dignity and respect. We want to encourage everyone in our business and those we work with to reach their full potential.

We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers 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.

All managers must set an appropriate standard of behaviour, leading by example and ensuring that those they manage adhere to the policy and promote our aims and objectives regarding equal opportunities. Managers and all workers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice as appropriate.

The HR Director has particular responsibility for ensuring the implementation and monitoring of the Equality and diversity policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

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 on the basis of aptitude and ability or needs of the job. 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.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our 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 everyone to this policy and application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Company.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting Dany at dany@theorise ltd.com

Breaches of this policy will be dealt with in accordance with our Disciplinary Procedure. Serious breaches may amount to gross misconduct resulting in dismissal without notice.

If you believe that you have suffered discrimination you can raise the matter informally in the first instance with a manager or through our Grievance Procedure.

Our commitment as an employer

Theorise Ltd is committed to:

- creating an environment in which individual differences and the contributions of our staff are recognised and valued
- everyone is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- providing training, development and progression opportunities to all staff
- understanding equality and inclusion in the workplace is good management practice and makes sound business sense
- reviewing all our employment practices and procedures to ensure fairness and inclusion for all
- taking steps to ensure equity amongst our workforce such as ensuring that our vacancies are advertised to a diverse range of potential candidates and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our Company, taking positive action to recruit disabled people and ensuring there are no unlawful barriers to accessing our employment opportunities, training, progression opportunities, benefits and facilities
- diversity in our workforce will be regularly monitored to ensure equal opportunities throughout the Company. Where appropriate, measures will be taken to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups
- monitoring and reviewing this policy annually.

Our commitment as a service provider

Theorise Ltd is committed to:

- providing services to which all clients are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation
- making sure our services are delivered equally and meet the diverse needs of our service users and clients
- taking steps to ensure equity amongst our clients and service users such as removing any unlawful obstacles to accessing our services or facilities. Where appropriate, measures will be taken to identify and remove unnecessary barriers and to meet the special needs of disadvantaged or underrepresented groups
- fully support of this policy by senior management and with employee representatives, if applicable
- monitoring and reviewing this policy annually
- having clear procedures that enable our clients, candidates for jobs and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.

Equal opportunity statements of Commitment

Age

We will:

- ensure that people of all ages are treated with respect and dignity
- ensure that people are given equal access to our employment, training, development and promotion opportunities and
- challenge discriminatory assumptions about younger and older people.

Disability

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities. If we feel that a particular adjustment would not be reasonable, we will discuss this with you and try to find an alternative solution where possible
- challenge discriminatory assumptions about disabled people and
- seek to continue to improve access to information by ensuring availability of loop systems, braille facilities, alternative formatting and sign language interpretation
- If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate
- We will keep the physical features of our premises under review to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

Race

We will:

- challenge racism wherever it occurs
- respond swiftly and sensitively to racist incidents and
- actively promote race equality and inclusion in the Company

- take positive action to redress the negative effects of discrimination against everyone
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

Gender

We will:

- challenge discriminatory assumptions about gender
- take positive action to redress the negative effects of discrimination against everyone
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same and
- provide support to prevent discrimination against transgender people who have or who are about to undergo gender reassignment.

Sexual orientation

We will:

- ensure that we take account of the needs of everyone, including the LGBTQ+ communities
- promote positive images of the LGBTQ+ communities
- challenge discriminatory assumptions about the LGBTQ+ communities
- take positive action to redress the negative effects of discrimination against everyone and
- offer equal access for everyone to representation, services, employment, training and pay and encourage other organisations to do the same.

Religion or belief

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Pregnancy or maternity

We will:

- ensure that people are treated with respect and dignity during pregnancy or maternity leave
- challenge discriminatory assumptions about pregnancy or maternity and
- ensure that no individual is disadvantaged during pregnancy or maternity leave and that we take account of the needs of our employees' during pregnancy or maternity leave.

Marriage or civil partnership

We will:

- ensure that people are treated with respect and dignity regardless of marriage or civil partnership status
- challenge discriminatory assumptions about the marriage or civil partnership of our employees and
- ensure that no individual is disadvantaged as a result of their marriage or civil partnership status.

Part time and fixed term work

Part time and fixed term staff will 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 justified.

Equal pay

We will ensure that all employees 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.

Our Ethos

The Company is committed to being a successful, caring and welcoming place for all employees and workers. We aim to create a supportive and inclusive environment where our everyone can reach their full potential, without prejudice and discrimination. We are committed to a culture where respect and understanding is fostered and the diversity of people's backgrounds and circumstances will be positively valued.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as we seek to develop the skills and abilities of our 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.

Through this policy and procedure and the inhouse training and development of our people, we will do all we can to promote best practice to eliminate discrimination and harassment as far as is reasonably possible. The Company will also continue to work towards its dedicated goal of encouraging and promoting equality and diversity within the workforce.

The policy aims to achieve equality by removing any potential discrimination in the way that our employees are treated by fellow employees or the Company, including:

- people with disabilities
- people of different sexual orientations

- transgendered and transsexual people
- people of different races
- people on the grounds of their sex
- those of faith and of no faith
- in relation to their age
- in relation to their social class or medical condition
- people who work part-time
- those who are married or in a civil partnership
- women who are pregnant, have recently given birth or are breastfeeding.

Discrimination can be either direct or indirect and some of the above are protected characteristics under the Equality Act 2010 and discrimination is prohibited, unless there is a legal exception under the Equality Act.

Direct discrimination

Is where someone is treated less favourably due to one (or more) protected characteristics and can be intentional or unintentional. Occasionally the discrimination may occur due to a protected characteristic of another person, so the discrimination may be because of association. An example is an advert for a job that requires 'men only' or 'under 30s only'. Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favourably because it is assumed they have.

Direct discrimination would apply if we, as a recruitment consultancy accepted and acted upon instructions from a client which state that certain persons are unacceptable due to a protected characteristic, unless an exception applies. The Act contains provisions that permit specifying that an individual must have a particular protected characteristic to undertake a specific job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then the client must show that applying the requirement is a proportionate means of achieving a legitimate aim, i.e. the employer must be able to objectively justify applying the requirement. An occupational requirement does not allow an employer to employ someone on less favourable terms or to subject a person to any other detriment.

Indirect discrimination

Is where someone is disadvantaged by an apparently neutral provision, criterion or practice (PCP) that is applied 'across the board' or 'equally across a particular group'. The PCP may have the consequence (usually unintended) of causing a disadvantage, which then adversely affects somebody. E.g., a PCP relating to clothing or headwear could be applied 'equally', but may cause someone with a protected characteristic to be

disadvantaged. The PCP could be justified if it is a proportionate means of achieving a legitimate aim.

Indirect discrimination would apply if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from a client. If the vacancy requires characteristics which represent an occupational requirement or the instruction is discriminatory but there is an objective justification, Theorise Ltd will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

Victimisation

Is not the same as the common meaning of victimisation but is specifically regarding treating someone less favourably because they have complained about or given information about discrimination or harassment, either regarding themselves or someone else.

Harassment

The Equality Act 2010 applies to how employees treat fellow employees, visitors, suppliers and former employees. The Act also applies to customers/clients.

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes but is not limited to:

- verbal or written conduct containing derogatory jokes or comments
- slurs or unwanted sexual advances
- visual conduct such as derogatory or sexually orientated posters
- photographs, cartoons, drawings or gestures which some may find offensive
- physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected characteristic
- threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours
- retaliation for having reported or threatened to report harassment.

If an individual believes that they have been unlawfully harassed, they should make an immediate report to Dany Brunton – dany@theorise ltd.com followed by a written grievance/complaint as soon as possible after the incident. The details of the grievance/complaint should include:

- Details of the incident
- Location, date, time.
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

We will undertake a thorough investigation of the allegations and if it is concluded that harassment has occurred, remedial action will be taken.

All employees and workers will be expected to comply with Theorise Ltd.'s policy on harassment in the workplace and any breach will lead to the appropriate disciplinary action which may include termination of employment.

DISABLED PERSONS

Discrimination occurs when a person is treated unfavourably because of their disability.

Indirect discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. E.g., it may be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

Reasonable adjustments in recruiting may include:

- modifying testing and assessment procedures
- meeting the candidate at alternative and more accessible premises
- having flexibility in the timing of interviews
- modifying application procedures and application forms
- providing a reader or interpreter.

Wherever possible Theorise Ltd will make reasonable adjustments to hallways, passages and doors to provide and improve means of access for disabled employees and workers. However, this may not always be reasonable in all the circumstances.

Theorise Ltd will not discriminate against a disabled person:

- in the terms on which employment or engagement of temporary workers is offered
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording them any such opportunity
- by subjecting an individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Theorise Ltd will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Equal opportunities will be monitored and reviewed via our:

- Self-check survey: Diversity and Inclusion
- Diversity Questionnaire