EQUAL OPPORTUNITIES POLICY

1.0 Policy Statement

Amtico is committed to providing equal opportunities in employment and avoiding unlawful discrimination in employment and against customers.

This policy is intended to assist Amtico to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. Amtico has a separate **dignity at work policy**, which deals with these issues.

This policy should be read in conjunction with the:

- Human Rights Policy Statement
- Dignity at Work Policy (Anti-Harassment and Bullying)
- Preventing Sexual Harassment Policy
- Grievance Procedure
- Disciplinary Procedure
- Speaking Up Policy
- Whistleblowing Policy
- Freedom of Association and Collective Bargaining Policy
- Modern Slavery and Human Trafficking Statement
- Child Labour, Remediation and Young Worker Policy

These policies collectively support Amtico's commitment to equality, diversity, inclusion, dignity, respect, employee voice, human rights and fair treatment for all employees, workers, applicants, customers, suppliers and other stakeholders.

2.0 Who does this policy apply to?

This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

3.0 What the Law says about Discrimination

It is unlawful to discriminate directly or indirectly in recruitment or employment because 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”.

Discrimination after employment may also be unlawful, e.g., refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer’s unreasonable failure to provide an auxiliary aid or service to the disabled employee.

Employees should not unlawfully discriminate against or harass other people, including current and former staff, 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.

It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

4.0 Types of unlawful discrimination

The following forms of discrimination are prohibited under this policy and are unlawful:

Direct Discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect Discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristics compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment includes unwanted conduct, related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose of effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. Matters involving sexual harassment should be read in conjunction with the **Preventing Sexual Harassment Policy.** It does not matter whether this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

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 or raised a grievance under the Equality Act 2010, or because they suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Disability discrimination includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability**.** Failure to make reasonable adjustments is where a physical feature or provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

5.0 Equal opportunities in employment

Amtico will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, 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. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Amtico will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if Amtico considers it had good reasons, unrelated to any protected characteristic, for doing so. Amtico will comply with its obligations in relation to statutory requests for contract variations. Amtico will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

Amtico will monitor workforce diversity data where lawful, appropriate and voluntary provided, including information relating to age, sex, ethnicity, disability and other diversity characteristics as applicable, and of applicants for jobs (including promotion)., and will consider and take any appropriate action to address any problem that may be identified as a result of the monitoring process.

6.0 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.

7.0 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 justified.

8.0 Dignity at work

Amtico has a separate **Dignity at Work Policy** concerning bullying, harassment and victimisation. Matters involving unwanted conduct of a sexual nature will normally be addressed under **the Preventing Sexual Harassment Policy.** Employees may also seek support through the **Grievance Procedure, Speaking Up Policy** or **Whistleblowing Policy** where appropriate.

9.0 Customers, suppliers and other people not employed by Amtico

Amtico will not discriminate unlawfully against customers using or looking to use goods, facilities or services provided by Amtico.

Employees should report any bullying or harassment by customer, suppliers, visitors, or others to their manager who will take the appropriate action.

10.0 Training

Amtico will provide appropriate and periodic equality, diversity and inclusion training to managers, employees and others engaged to work for Amtico. Additional training will be provided where specific risks, legal developments or business needs are identified.

11.0 Your responsibilities

Every employee is required to assist Amtico to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

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

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

12.0 Grievances

If you consider that you may have been unlawfully discriminated against, you may use the grievance procedure to make a complaint. If your complaint involved bullying or harassment, the grievance procedure is modified as set out in the **Dignity at Work Policy**.

Where concerns relate to wider organisational practices, ethical concerns, human rights matters or serious misconduct, employees may also raise concerns through the **Speaking Up Policy** or **Whistleblowing Policy** where appropriate.

Amtico 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 both untrue and made in bad faith.

Use of Amtico's grievance procedure does not affect your right to make a complaint to an employment tribunal. Complaints to an employment tribunal must normally be made within three months beginning with the act of discrimination complained of.

13.0 Monitoring and review

Monitoring outcomes will be reviewed periodically by the HR Department to identify any actual or potential barriers affecting equality of opportunity, diversity and inclusion. Findings may inform policy updates, training programmes, recruitment practices, employee development initiatives and other improvement activities. Information gathered through monitoring, grievances, employee feedback, audits and whistleblowing reports may be used to support continual improvement of equality and inclusion practices across the organisation

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Privacy Standard. Information about how data is used and the basis for processing is provided in Amtico's candidate privacy notice.

14.0 Equity Impact Assessment and Monitoring

14.1 Equality Principles

Amtico is committed to ensuring this policy is applied fairly, consistently and without discrimination.
This policy supports the principles of the **Equality Act 2010** and is intended to promote equality of opportunity, diversity, inclusion, dignity and respect throughout all aspects of employment, recruitment, promotion, training, reward, development and service delivery. The policy applies equally to employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

14.2 Individuals Potentially Affected

This policy is expected to have a positive impact across the workforce. Particular consideration should be given to employees and workers with protected characteristics, including:

- Employees with disabilities
- Employees with caring responsibilities
- Women
- Ethnic minority employees
- LGBTQ+ employees
- Employees of different religions or beliefs
- Older and younger workers
- Pregnant employees and new parents
- Agency workers, temporary workers, apprentices and interns

Amtico recognises that some groups may experience barriers to recruitment, progression, development opportunities or raising concerns and will seek to identify and address these barriers where appropriate.

14.3 Inclusive Decision-Making

Managers must ensure that employment decisions are made objectively and based solely on legitimate business and role-related criteria.

This includes:

- Recruitment and selection decisions
- Promotion and career development opportunities
- Training opportunities
- Pay and reward decisions
- Disciplinary and grievance outcomes
- Redundancy selection processes

Managers must consider whether any policy, practice, requirement or decision could have an unintended adverse impact on individuals or groups sharing a protected characteristic and take appropriate action where necessary

14.4 Accessibility and Reasonable Adjustments

Amtico will seek to ensure information relating to this policy can be made available in accessible or alternative formats where reasonably required.

Where appropriate, Amtico will:

- Make reasonable adjustments for disabled employees and job applicants.
- Consider alternative formats for communication and documentation.
- Remove barriers that may disadvantage disabled individuals.
- Support employees who require workplace adjustments to perform their role effectively.

Employees are encouraged to discuss any adjustment requirements with their manager or the HR Department so that appropriate support can be considered.

14.5 Monitoring and Oversight

The HR Department will monitor the effectiveness of this policy through the review of:

- Recruitment and promotion outcomes
- Workforce demographic information
- Training participation
- Employee relations cases
- Grievances relating to discrimination, bullying or harassment
- Exit interview feedback
- Employee engagement surveys and feedback
- Internal and external audit findings

Monitoring will seek to identify any trends, barriers or unintended adverse impacts affecting particular groups and support the development of appropriate corrective actions.

14.6 Speaking Up and Reporting Concerns

Employees are encouraged to raise concerns where they believe discrimination, unequal treatment or barriers to inclusion may exist.

Concerns may be raised through:

- Line management channels
- The Grievance Procedure
- The Dignity at Work Policy
- The Preventing Sexual Harassment Policy
- Speaking Up and Whistleblowing arrangements where appropriate

Individuals who raise concerns in good faith will not be subjected to retaliation, victimisation or disadvantage for doing so.

14.7 Continuous Improvement

Amtico will periodically review equality data, employee feedback, audit findings and legislative developments to ensure this policy remains effective.

Where monitoring identifies actual or potential inequalities, Amtico may implement:

- Additional training and awareness programmes
- Policy and procedural updates
- Recruitment and development initiatives
- Additional management guidance
- Enhanced monitoring activities

Continuous improvement measures will support Amtico's commitment to providing equal opportunities and maintaining an inclusive workplace culture.