

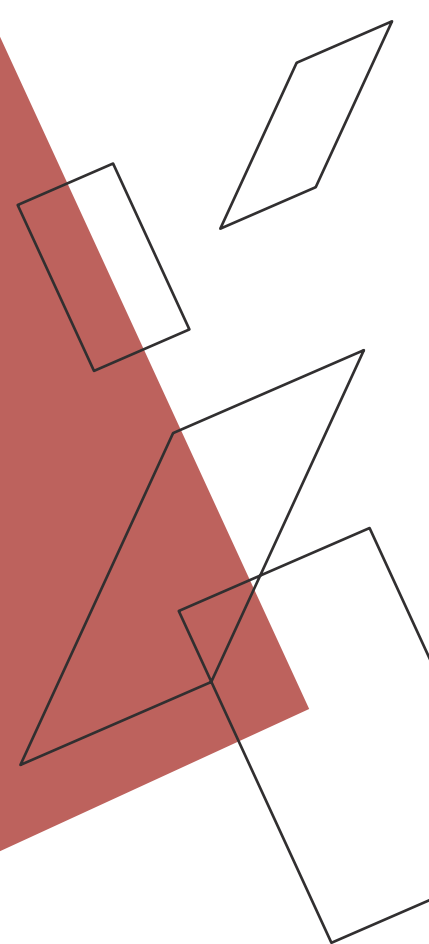
Compliance

Equal Opportunities Policy

Version

1.2

October 2023



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Change History Record

Version	Description of Change	Approval	Date of Issue
1.0	Creation of Policy	RS	Oct 2022
1.1	Update of names and dates.	RS	Oct 2023
1.2	Update of names	RS	March 2024

Policy Statement

The LLP recognises that discrimination in the workplace, in any form, is unacceptable and, in most cases, also unlawful. We have therefore adopted an Equal Opportunities Policy to ensure that all job applicants and employees are treated fairly and without favour or prejudice. We view the principles of equal opportunity as a vital element of the work ethos for both the welfare of our staff and the future of the LLP. Our aim is to eliminate discrimination and encourage diversity among the workforce. We are committed to applying this policy throughout all areas of employment, retirement and selection, training, development, promotion and termination of employment.

The purpose of this policy is to set out our approach to equal opportunities and the avoidance of discrimination at work. No employee shall be discriminated against, directly or indirectly, on the grounds 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 (Protected Characteristics). In all situations, people will be judged solely on merit or ability.

We are committed to the following:

- Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Providing every employee with a working environment that promotes dignity and respect to all. We will not tolerate any form of intimidation, bullying or harassment.
- Providing training, development and progression opportunities to all employees.
- Promoting equality in the workplace as it is good management practice and makes sound business sense.
- Reviewing all our employment practices and procedures periodically to ensure fairness.
- Regarding any breaches of this policy as misconduct that could lead to disciplinary proceedings, which may include dismissal.
- Ensuring this policy is fully supported by senior management.
- Ensuring this policy will be monitored and reviewed periodically.
- Implementing this policy.

Duties & Responsibilities

The commitment of all employees is necessary to make the policy a success. It is the responsibility of each and every individual to ensure that their own conduct in the exercise of the LLP's affairs and in their dealings with their colleagues both during working time and at work-related social occasions is consistent with this policy.

This policy will be made known to all employees and job applicants, as well as sources from which job vacancies are filled, such as recruitment agencies.

Managerial Responsibility

John Mills has ultimate responsibility for the effective operation and development of this policy. The day-to-day responsibility for the policy will be assigned to members of the management team. This policy does not form part of any employee's 'Contract of Employment' and we may amend it at any time.

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), and on work-related trips or events including social events.

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

- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because of their sexual orientation.
- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this 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.

Responsibility of Staff

Whilst overall responsibility for ensuring that there is no unlawful discrimination rests with the LLP, individual employees at all levels and in all departments have a personal and legal responsibility to respect and act in accordance with the policy. In particular, you should:

- Co-operate with measures introduced by the LLP to ensure equal opportunities and non-discrimination.
- Not act or behave in a manner whereby you discriminate against others.
- Not induce or attempt to induce colleagues to practise unlawful discrimination.
- Not victimise or attempt to victimise individuals because they have made complaints or provided information in relation to discrimination.
- Not harass, abuse or intimidate other employees on account of their 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.
- Immediately inform John Mills or Simon Vaughan if you think that discrimination or harassment is taking place within the work environment.
- Request training if you have any doubt about the application of this policy.

Employees are fully encouraged to contribute to the development of this policy and should employees have any ideas, comments or suggestions as to how this policy may be further improved, they should contact John Mills or Simon Vaughan by sending a letter, internal memo or email, or by arranging an appointment.

Disability

The LLP attaches particular importance to the needs of disabled persons. We will give full and proper consideration to disabled people who apply for positions within the LLP. In particular, we will consider making reasonable adjustments to the workplace in order to meet their specific needs.

Where employees become disabled in the course of their employment they are encouraged to inform the LLP as soon as possible. We will take reasonable steps to accommodate their disability to enable such employees to remain with the LLP wherever possible. In order to prevent disadvantages to that employee arising, we will consider what reasonable adjustments or support may be appropriate, to the employee's existing working conditions, including consideration of retraining and alteration to the premises and working environment.

Recruitment & Promotion

It is LLP policy that all job applicants and existing employees have an equal, full, and fair opportunity for selection and promotion based on their aptitudes, merits, abilities and qualifications, and that they will not be disadvantaged by conditions, criteria and requirements that cannot be properly justified.

To ensure that we reach the widest cross section of the community, all vacancies will be advertised through advertising agencies or the independent media. Our application form will be as simple and straightforward as possible, and we will not ask for unnecessary information.

Interview questions will be related to the requirements of the job, and we will not seek irrelevant qualifications. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: For example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

Applicants will be short listed / selected solely on the basis of capability and we will ensure that no job applicant or employee receives less favourable treatment on the grounds of a Protected Characteristic.

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, where possible.

Training & Development

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 organisation.

We encourage training and further development of all our employees where this is of benefit to the individual and to the LLP. This includes the provision of training to meet the special needs of disabled employees. Each case will be treated on its merits and we will consider a flexible approach to training according to the circumstances of the individual.

Fixed Term & Part Time Employees

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

We monitor our use of fixed term employees and their conditions of service to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

We monitor the conditions of service of part time employees and their progression to ensure that they are being offered appropriate access to benefits, training and promotion opportunities.

Discipline & Grievance

The LLP takes a strict approach to breaches of this policy and a breach of this policy may be considered a disciplinary offence and will be dealt with in accordance with the LLP's Disciplinary Procedure. We will treat any serious breaches of this policy as gross misconduct and such breaches may result in summary dismissal.

We encourage any employee who wishes to make a complaint in relation to behaviour which is inconsistent with this policy. Our Grievance Procedure is available to all employees, irrespective of position or status, and should be used where any member of staff wishes to complain about discriminatory conduct inconsistent with this policy. Allegations regarding potential breaches of this policy will be treated in confidence. No member of staff will be penalised for raising such grievances unless their complaint is untrue or made in bad faith. In the event that an employee is found to make a false allegation under this policy deliberately and in bad faith, this will be treated as misconduct and dealt with under our Disciplinary Procedure.

Monitoring & Review

The Equal Opportunities Policy will be reviewed periodically by the LLP. We will monitor job applicants and existing employees periodically in relation to, for example, gender, ethnicity, disability, religion, sexual orientation and age, to enable the LLP to examine how this policy is working and in order to ensure fairness within the workplace. We will keep this information confidential and it will be used for this purpose only.

Should any employee wish to dispute any part of this policy, they may use the LLP's Grievance Procedure.

October 2023



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