

DIVERSITY AND EQUALITY POLICY

This Policy applies to all the employees of any Company ('the Company') in Wavepoint Group.

The Company is committed to creating a culture that respects and values each others' differences, that promotes dignity, equality and diversity and that encourages individuals to develop and maximise their true potential.

It is the Company's policy to treat all employees, potential employees, customers and other stakeholders fairly and equally regardless of their sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief. Furthermore, the Company will ensure that no requirement or condition will be imposed without justification that could disadvantage individuals purely on any of the above grounds.

The policy applies to recruitment and selection, terms and conditions of employment including pay, promotion, training, transfer and every other aspect of employment.

The Company is committed to the implementation of this policy and to a programme of action to ensure that the policy is, and continues to be, fully effective. All staff are required to comply with the policy and to act in accordance with its objectives so as to remove any barriers to equal opportunity. Any act of discrimination by employees or any failure to comply with the terms of the policy will result in disciplinary action.

Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every Line Manager and employee has personal responsibility for the implementation of the policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to the Group HR Department, as should any requests for special training.

All employees should be aware, at all times, of the importance that the Company attaches to its Equality & Diversity Policy, and must ensure that their actions, attitudes and behaviour do not directly or indirectly discriminate against job applicants or employees.

Our Commitment

As a Company we are committed to equality of opportunity and to the elimination of direct and indirect discrimination, harassment and victimisation of employees, job applicants, customers and contractors alike. We aim to create and maintain a working environment, terms and conditions (including equal pay for work of the same or similar nature or work of equal value)

and personnel and management practices which ensure that no individual receives less favourable treatment on the grounds of their:

- sex;
- race;
- religion or belief;
- nationality;
- colour;
- ethnic origin;
- age;
- marital or parental status;
- gender (including gender reassignment);
- sexual orientation;
- physical or mental disabilities.

This list is not exhaustive.

Furthermore we are committed to:

- create an environment in which individual differences and the contributions of all our employees are recognised and valued;
- ensure that every employee has a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
Employees experiencing
- any form of intimidation, bullying or harassment or any other form of discrimination should submit a grievance to their Line Manager;
- training, personal development and career progression opportunities are available to all employees;
- equality in the workplace is good management practice and makes sound business sense;
- review all our employment practices and procedures to ensure fairness;
- ensure that breaches of our Equality & Diversity Policy will be regarded as misconduct and
- could lead to disciplinary proceedings.

Protected Characteristics

The current legislation identifies 9 (nine) protected characteristics defined as follows:

- Age
 - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
- Disability
 - A person has a disability if he/she has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- Gender reassignment

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- The process of transitioning from one gender to another.
- Marriage and civil partnership
 - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'.
- Pregnancy and maternity
 - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
- Race
 - A group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- Religion and belief
 - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
- Sex
 - A man or a woman.
- Sexual orientation
 - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

Types of Discrimination

- Direct Discrimination

Occurs when someone is treated less favourably than another person because of a protected characteristic.

- Associative discrimination

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic (e.g. a mother of a disabled child). Does not apply to marriage/civil partnerships or pregnancy/maternity.

- Perceptive discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Does not apply to marriage/civil partnerships or pregnancy/maternity.

- Indirect discrimination

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Indirect discrimination can occur when a condition, rule, policy or a practice applies to everyone but which may particularly disadvantage people who share a protected characteristic. Does not apply to pregnancy/maternity.

- Harassment

Harassment is unwanted conduct related to a relevant 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.

Harassment may also include complaints of behaviour that is found to be offensive even if it is not personally directed at the individual and the complainant need not possess the relevant characteristic themselves.

The protection is extended in that employees are also protected from harassment because of perception and association.

See the Bullying & Harassment Policy for more information.

- Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the legislation; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Procedure

- As an equal opportunities employer we recognise the need for continual action in order to promote equality of opportunity. Every manager and employee has a personal responsibility to implement this policy.
- The Company requires that its customers, suppliers and the general public are treated consistently within this policy.
- Decisions with regards to recruitment, training and promotion will only be made with reference to the requirements for that position. Directors, managers and any employee involved in recruitment, training or promotion will be provided with equal opportunities training, and should request additional training should they feel it is necessary.
- Employees who are disabled or become disabled in the course of their employment should inform the Company about their disability and may also wish to advise the Company of any "reasonable adjustments" to their job or working conditions or environment that might be necessary to assist them in the performance of their duties. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable such adjustments will be made. There may, however, be circumstances where it will not be reasonable or reasonably practicable for the Company to accommodate those proposals.
- All employees and job applicants will be asked to complete a form denoting their gender, race, ethnic origin, age and any disabilities. The Company guarantees that the

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information provided on this form will be used solely for the purpose of monitoring the effectiveness of its Equality & Diversity Policy.

- The composition of the workforce and job applicants will be monitored on a regular basis.

Should inequalities in recruitment, training or promotion become apparent, positive action may, if appropriate, be taken to redress the imbalance.

- Any employee who harasses or treats another employee less favourably on the grounds of their sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief will be subject to the Disciplinary and Dismissal Procedure.

Recruitment

The Company will ensure that:

- we will not discriminate unlawfully in arrangements for determining who should be offered employment;
- we will not discriminate unlawfully on the terms on which employment is offered; and
- we will not discriminate unlawfully by refusing to offer employment.

Sources of Candidates

Sourcing of applicants should include not only local, national and trade press, but also a combination of the following: employment agencies, Employment Services, search and selection consultants, existing employees, direct applicants, schools, careers, further and higher education establishments etc. as appropriate.

Advertising

It is necessary to state that the Company is an equal opportunities employer in all recruitment advertising (both internal and external), and that the Company welcomes applications from all people regardless of sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief. Clear instructions must be given with regards to how an application should be made.

Interviews

The interview is the stage of the process at which the recruiter is most vulnerable to his/her own subjectivity. Interviews should always be confirmed in writing or the preferred format for a visually impaired candidate. Under provisions in the current legislation, the Company has a duty to make reasonable adjustments at interview for a disabled candidate such as:

- holding an interview on the ground floor for a wheelchair user; or
- allowing the candidate to be accompanied by a signer or interpreter.

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All candidates will be asked prior to their interview if they have any special requirements in order for them to not be disadvantaged at the interview stage.

Selection

The selection criteria described within the job specification and person specification are designed so that;

- only relevant competencies are measured and only at the relevant level; and
- candidates that are equally able to do the job are equally able to meet the assessment criteria regardless of sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief

Promotion and Transfer

All the criteria used by the Company that contribute to the decisions for promotion or transfer must be objective, free from bias, justifiable and must not discriminate unlawfully either directly or indirectly.

Training

The selection criteria used for access to training should not discriminate unlawfully either directly or indirectly.

The Company has formulated a consistent approach to occupational training. The Company promotes a fair and consistent training plan obtained through the personal development and appraisal system.

As part of this process an individual's needs are assessed against the following criteria:

- requirement for the individual's current job;
- requirement for a job to which the candidate is to be promoted;
- legal or best practice requirements; and
- personal development.

Performance Development Reviews

The Performance Development Review discussion must be conducted in such a way that it does not discriminate against a person on the grounds of sex, sexual orientation, trans-gender status, marital status, civil partnership status, pregnancy/maternity, race, colour, nationality, ethnic or national origin, religion/ belief, age, disability, union membership status or political belief

Communications

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It is the Company's policy to make every effort to avoid the use in all its internal and external communications of gender-biased language and oppressive or offensive terminology and imagery, and to promote inclusive language and imagery.

Concerns about Discrimination

If you have any concerns regarding inequality of opportunity you should pursue the matter through the Company's Grievance Procedure.

Alternatively such reports can be made directly through the Whistleblowing (Disclosure) Policy if it is felt that the use of the Grievance Procedure is an inappropriate course of action. The Company is concerned to ensure that employees feel comfortable about raising such complaints. No individual will be penalised for raising such a complaint unless it is untrue and made in bad faith.

Breaches of the Equality & Diversity Policy

Any employee who does not implement the Equality and Diversity Policy will be subject to disciplinary action up to and including summary dismissal.

We are committed to:

- support the principles and practices of equal opportunities and ensuring that it is the duty of all employees to accept personal responsibility for implementing and adhering to the principles of equal opportunity and maintaining harmony in the work environment;
- actively promote equal opportunities throughout the organisation through the application of employment policies and practices which will ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential, skills and abilities;
- ensure that all Managers will ensure that all employees comply with these principles;
- ensure that individuals are recruited, remunerated, promoted and trained on objective criteria having regard to their relevant aptitudes, potential, skills and abilities. In particular, no applicant will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job or which constitute direct or indirect unfair discrimination;
- monitor the composition of our employees and applicants for jobs on an anonymous basis at all levels;
- monitor the number and outcome of complaints under the Equality & Diversity Policy and the Bullying & Harassment Policy. A report will be made to the Board annually;
- ensure that no employment decision will be taken based on irrelevant or discriminatory criteria; and

- where our business needs allow, working patterns will be reviewed so as to enable us to offer flexible working where practicable, to employees and to applicants for employment who have 'carer' or childcare responsibilities.

Monitoring and Assessment

The Company will assess and review the effectiveness of the Equality and Diversity Policy, and the impact of all other relevant policies and practices on all employees.