



the SES Group is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants fairly.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, race, gender, ethnic origin, religion or belief, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity.

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, gender, ethnic origin, religion or belief, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

The Company believes that the promotion of equal opportunities in employment enhances the overall success of the business and therefore fully supports the adoption of the Company's Equal Opportunities and Managing Diversity policy.

All possible measures will be taken to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, training, promotion, terms and conditions and career management are based solely on objective and job related criteria.

The Company requires all employees to abide by this policy and any breach will be addressed via the appropriate disciplinary procedure. The Company will investigate any reported breaches in the equal opportunities policy.

The Company is committed, wherever practicable, to achieving and maintaining a workforce that broadly reflects the local community in which we operate.

Scope of the policy

the SES Group's commitment to Equal Opportunities, Diversity and Inclusivity applies to the following areas:

- Job applicants and potential applicants
- Contract workers
- Agency workers
- Employees
- Student on work experience or placement
- Former employees
- Provision of service by the organisation and its employees
- Relationship with customers and suppliers.

Definition of Discrimination

There are four kinds of discrimination:

Direct discrimination

Occurs when a person is treated less favourably than another on the grounds of their age, race, gender, ethnic origin, religion or belief, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity.

Indirect discrimination

Can occur when a requirement or condition, which cannot be justified on grounds other than age, race, gender, ethnic origin, religion or belief, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity is applied equally but that the effect in practice of disadvantaging a considerably higher proportion of persons in one or other of the above groups.

Associative discrimination



Was introduced by the Equality Act 2010 as an aspect of direct discrimination. This is because new wording is used to define direct discrimination as discrimination 'because of' a protected characteristic'.

Associative discrimination is discrimination against a person because they have an association with someone with a particular protected characteristic. This already applied to race, religion or belief, and sexual orientation and has been extended to cover age, disability, gender reassignment and sex.

An example of associative discrimination might be a non-disabled employee who is discriminated against because of action she needs to take to care for a disabled dependant.

Perceptive discrimination

Was introduced by the Equality Act 2010 as an aspect of direct discrimination. This was because new wording is used to define direct discrimination as discrimination 'because of' a protected characteristic'.

Perceptive discrimination is discrimination against a person because the discriminator thinks the person possesses that characteristic, even if they do not in fact do so.

Perceptive discrimination already applied to age, race, religion or belief and sexual orientation, and has been extended to cover disability, gender reassignment and sex.

Examples of indirect discrimination may include:

- height requirements (e.g. requiring applicants to be at least six feet tall will indirectly discriminate against women).
- Insisting on higher language standards than are needed for the safe and effective performance of the job.
- Rules about clothing which disadvantage a racial group and cannot be justified.

In this policy "grounds" means any of the following grounds namely age, race, gender, ethnic origin, religion or belief, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity.

In this policy "Company" includes any employee of the Company whether full time or part time, in permanent or temporary employment or under temporary contract that acts on behalf of the Company. Sub-contractors and other agencies hired to work for us need to be made aware of this policy.

Legal requirements

The Equality Act 2010

Responsibilities

The Managing Director of the Company is responsible for the adoption and review of the Company's Equal Opportunities and Managing Diversity policy. Responsibility for the application of the policy rests with the Managers who are accountable to the Managing Director.

The primary responsibility at law rests with the Company to ensure that there is no unlawful discrimination. However, individual employees at all levels have responsibilities too in that the equal opportunities legislation contained in the Equality Act 2010, places a statutory duty on all employees not to discriminate or knowingly aid their employer to do so.

Communication & Training

the SES Group will ensure that all employees are fully aware of the Company's Equal Opportunities and Managing Diversity policy and understand their responsibilities under it and the law, which prohibits direct or indirect, associate or perceptive discrimination.

In addition, key managers, supervisors and all personnel with delegated responsibilities under the policy will receive suitable and sufficient training to ensure their competence to carry out their duties in particular those with a responsibility for recruitment, promotion, training, disciplinary and dismissal.

Monitoring

We constantly aim to reflect this policy in our activities, particularly in relation to the provisions of our services and employment. All aspects of personnel policies and procedures will be kept under review by management to ensure



that they do not operate against equal opportunities. To enable the Company to maintain its commitment to this policy and to ensure it achieves its aims, it will analyse, from available information, the sex, marital status, racial and ethnic origin and any disabilities of employees to enable this to take place.

The Company will ensure that information obtained from individual employees or applicants to the Company for the purpose of monitoring this policy will be used exclusively for that purpose and will be protected from misuse.

This policy will be reviewed from time to time to ensure that it consistently achieves its aims to offer equal opportunities to everyone. Action will be taken against those personnel who fail to apply this policy.

Breaches

All employees are required to behave in a non-discriminatory manner toward other employees, customers and suppliers in any dealings in the course of their employment. Any behaviour considered to be discrimination or harassment as covered by this policy will be subject to the disciplinary process.

Any employee who considers that they have been subjected to discrimination or harassment is encouraged to raise the matter through the grievance procedure.

They should raise the matter with their line manager in the first instance. If raising it with the line manager is inappropriate, the employee should approach the HR department or a nominated employee where such an individual has been identified. The matter will be fully and sympathetically investigated. During the investigation the employee may have a SES work colleague of their choice in attendance.

Depending on the result of the investigation, disciplinary action will be taken where appropriate. Where the breach arises from Company procedures or practices the Company will review and amend such procedures or practices.

Malicious accusations of discrimination or harassment, proven after an investigation, will result in the accuser being subjected to disciplinary action.

Employment policies and practices

All the Company's employment practices and terms and conditions of employment will be applied in strict observance of the Equal Opportunities Policy and objectives.

Recruitment

All appointments are openly advertised except, where internal promotions are required to be drawn from existing staff or of those occupations where a genuine occupational qualification is essential.

Selection of employees is based on skills and/or qualifications and the demonstrated or assessed ability to perform within the post to be filled. It is accepted that disabled applicants and employees may need physical aids for their full employment potential to be realised and in these circumstances, the procurement of such aids does not adversely affect the individual's opportunity to be recruited or promoted. Short listing is undertaken by at least two people to reduce personal bias.

Applicants for positions with the Company will be given as much information as required through advertisements and a job description to enable them to assess their suitability for any such position.

The Company's application forms request information such as sex, date of birth, nationality etc. The information will only be used for monitoring purposes, and it will be treated in the strictest confidence.

Promotion

All employees of the Company will be given the opportunity to discuss their career prospects and training needs with their Manager.

Vacancies will be given as wide an internal circulation as possible to employees of the Company, via the Company notice boards.



All employees of the Company will be given the opportunity to apply for promotion to any position for which they consider themselves suitable without discrimination on any grounds in selection for such promotion.

Training


Appropriate training and training courses will be provided without discrimination on any grounds to enable employees of the Company to perform their jobs effectively.

All staff involved in interviewing and in selection will be given training, guidance in the law, be fully aware of this Policy, their own personal liability under the law and the nature of discrimination to ensure that recruitment, promotion and job training take place in accordance with this policy.

Disciplinary and Dismissal

Disciplinary, dismissal (including redundancy) processes will be conducted in such a way to treat all the SES Group employees equally. The company will train and/or support all Line Manager's to enable them to deliver their managerial responsibilities in line with the following principles:

- **Good faith** – disciplinary and dismissal policies and procedures will be applied in a consistent manner and without discrimination.
- **Fairness** – Any action taken will be reasonable and necessary. Employees involved are entitled to be consulted and heard with courtesy and respect.
- **Confidentiality** – Information relating to disciplinary and dismissal matters will only be shared with individuals who have a need to know.

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Signature:	
Date:	16/08/2021