

CEN IDEA LTD

Equal Opportunities and Diversity Policy

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Public

CEN IDEA LTD

10 Seaforth Gardens, Bedford, England, MK40 4TJ

Equal Opportunities and Diversity Policy

1. Purpose

CEN IDEA LTD (the “Company”) is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. We are committed to being a business in which equality of opportunity is a reality and in which every individual can seek, obtain and continue employment without unfair discrimination.

This Policy sets out the Company’s approach to equal opportunities and the avoidance of discrimination at work.

It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

The policy’s purpose is to:

- Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time.
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.
- Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.
- Reinforce our commitment to an inclusive culture within which the opinions of all Staff are valued and innovation is encouraged.

2. Scope

The procedures and principles set out herein must be followed at all times by the Company and all its employees, agents, contractors, consultants, temporary staff, casual or agency staff, or other suppliers or data processors (hereafter referred to as “Staff”) working for or on behalf of the Company.

3. Equality Statement

The Company commits to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- Take seriously any complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the Company’s work activities.
- Deal with such acts as misconduct under the Company’s grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- Make opportunities for training, development and progress available to all Staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Company.
- Decisions concerning Staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability. Monitoring will also include assessing how the Equality, Diversity and Inclusion Policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

4. Policy Statement

The Company will make every effort to create an environment that promotes equality in the workplace but it is important to recognise that creating an environment without discrimination is a collective task for all Staff.

All Staff have personal responsibility to ensure compliance with this policy, to treat colleagues with dignity at all times and not discriminate against or harass other members of Staff, visitors, clients or any other individual with whom the Company has a relationship.

All Staff should understand they, as well as the Company, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

Staff are required to:

- Co-operate with measures introduced by the Company to ensure equal opportunity and non-discrimination.
- Not discriminate personally or attempt to persuade others to practise discrimination.
- Not victimise individuals if they have made complaints of discrimination.
- Not harass, abuse or intimidate other Staff on any account.
- Inform your manager or a member of the senior management team if you suspect that discrimination is taking place in employment decisions or if you witness harassment.

Staff who are involved in the recruitment, selection, promotion or other aspects of career development are expected to lead by example and ensure that the guidelines set out within this policy are complied with and that our Company's inclusive culture is promoted.

5. Equality and Discrimination

Equality is about ensuring everybody has an equal opportunity, and is not treated differently or discriminated against because of their characteristics.

Under the Equality Act 2010 it is against UK law to discriminate against anyone because of: age; gender reassignment; being married or in a civil partnership; being pregnant or on maternity leave; disability; race including colour; nationality; ethnic or national origin; religion or belief; sex; or sexual orientation.

Staff must not 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.

CEN IDEA LTD prohibits all forms of discrimination including:

5.1. Direct discrimination

Treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they are gay.

5.2. 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.

5.3. Victimisation

Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

5.4. 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.

5.5. Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to 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. Harassment is unacceptable even if it does not fall within any of these categories.

5.6. What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats
- overbearing and intimidating levels of supervision
- inappropriate derogatory remarks about someone's performance

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

6. What if I am being discriminated against, harassed or bullied?

If you are being harassed, bullied or discriminated against, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

6.1. Protection and support for those involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure. Equally, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

6.2. Record keeping

Information about a complaint by or about a member of Staff may be placed on the Staff's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

7. Diversity

Diversity is about taking account of the differences between people and groups of people, and placing a positive value on those differences. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

7.1. Employment decisions

Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Job applicants will receive equal treatment regardless 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.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

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. The information will not be used as part of any decision making process relating to the recruitment or selection process.

Our recruitment policies may be reviewed at regular intervals to ensure people are being treated fairly and according to ability and merit.

7.2. Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

8. Inclusive Culture

It is important to the Company that everyone feels valued at work and comfortable coming up with different ideas, raising issues and suggestions to managers and investigating ways to do things better.

We believe that a transparent, diverse and inclusive workplace is key to individual, team and company success.

9. Policy Governance

Responsibility for the Equal Opportunities and Diversity Policy rests with Edwin Nwofor. Duties include, but are not limited to:

- Ensuring that all staff in scope and appropriate external parties have read and confirmed their acceptance of the latest version of this policy
- Monitoring for legal, regulatory or industry best practice developments in relation to this policy
- Coordinate with senior management, IT, and legal counsel to communicate and review issues related to this policy
- Review and update this policy at least every 4 months, in order that it remains fit for purpose

Exceptions to this policy shall be allowed only if previously approved by Edwin Nwofor.

This policy has been approved by senior management and is effective from 08-Sep-2023.