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## Equal Opportunities and Diversity Policy

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Fortel promote a working environment in which diversity is recognised, valued and encouraged. We acknowledge the multi-cultural and diverse nature of the UK workforce and society in general. We are committed to principles of fairness and mutual respect where everyone accepts the concept of individual responsibility. It is therefore the responsibility for all parties to make sure they observe and adhere to this Policy at all times. We view any breach seriously, we **will** investigate and potentially take action, and this may include dismissal or review of working relationship with other parties in instances we consider breach this, Policy.

We recognise that discrimination in the workplace in any form is unacceptable and, in most cases, unlawful. Our policy seeks to ensure job applicants and employees are treated fairly and without favour or prejudice. We are committed to applying this throughout all areas of employment. This includes recruitment and selection, training and development, benefits, rewards and promotion, dealing with grievances and disciplinary issues. We require parties that work with us adhere to the same standards.

Our policy complies with current legislation. We review it regularly and will update it if the law changes. However, we recognise that equality of opportunity is best achieved by day to day commitment throughout the organisation. We offer support and training where necessary to achieve and maintain this.

### 1.0 Recruitment

The recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable job-related criteria. Decisions regarding an individual's suitability for a particular role will be based on aptitude and ability.

To ensure all Recruitment and Selection decisions adhere to the specific legislation, the following guidelines should be followed:

- Advertise so that the widest possible pool of applicants is reached.
- Ensure procedures and decisions are supported by documentation based on job requirements.
- Design role profiles and person specifications that are job specific.
- Ensure that interviews and other selection methods are conducted fairly and consistently and outcomes recorded.
- Interviewers will be trained and be equipped with the necessary skills to enable them to collect objective evidence and use standards or specific criteria which are consistent for the role.
- Adequate and full interview notes will be made to support any decisions and guidelines will be followed with regard to all aspects of the employment cycle.
- Fortel will take all reasonable steps to make recruitment decisions based on ability and qualification without regard to protected characteristics. No decision will be made which cannot be objectively justified.
- Selection will be based on the job requirements and the individual's suitability and ability to do, or train for, the job in question. All applicants will be treated equally.
- Decisions will be based on job requirements and will be backed up with full documentation which should be retained on file.
- No assumptions will be made about an individual's ability to perform tasks and decisions will be made based on the information available.

Fortel will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not substantially disadvantaged.

Fortel will consider taking appropriate positive action to enable or encourage applications from persons with a protected characteristic that is under represented in the organisation.

### 2.0 Protected Characteristics

No job applicant, employee or anyone our organisation deals with receives less favourable treatment because of their protected characteristics. The protected characteristics are: -

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including colour, nationality, ethnic or national origin)

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- Religion or Belief
- Sex
- Sexual Orientation

### Types of Discrimination

There are several types of discrimination. The following are the types of discrimination that this policy aims to avoid:

#### Direct Discrimination

This occurs when a person is treated less favourably because of a protected characteristic that they have (or are thought to have - see 'Perceptive discrimination' below). For example, making decisions about whether someone should be offered, or not offered, a job because of a protected characteristic or treating colleagues or customers differently because of a protected characteristic.

#### Associative Discrimination

Direct discrimination (above) can also occur by way of association, which is when a person is treated less favourably because, for example, their spouse, civil partner or relative has a protected characteristic.

#### Perceptive Discrimination

Direct discrimination (above) can also occur because the discriminator thinks the person possesses a protected characteristic on which discrimination is based, even if they do not in fact do so.

#### Indirect Discrimination

This occurs when a provision, criterion or practice is applied to everyone but has a disproportionate adverse impact on people with a particular protected characteristic. For example:

- Setting height restrictions which indirectly discriminate against women or certain ethnic groups.
- Introducing a 'no headwear' policy for all employees. The policy, although applied to all employees, disadvantages Sikh employees who wear turbans for religious reasons.

To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.

#### Victimisation

Victimisation is treating a person unfavourably because the person has made a complaint, acted as a witness to a complaint or initiated proceedings connected with a complaint of discrimination. Victimisation is also in itself a form of unlawful discrimination.

Fortel will take all reasonable steps to ensure that employees are protected against victimisation and it is unlawful and a disciplinary offence to victimise an employee for bringing a complaint in accordance with the policy

#### 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.

Employees can complain of harassment even if they don't personally possess the protected characteristic or the harassment is not directed at them. Employees should also notify Fortel of any harassment by a third party who is not a Fortel employee.

Fortel will take all reasonable steps to ensure that employees are protected against harassment and it will be and a disciplinary offence to harass an employee. Where harassment is related to a protected characteristic it will also be unlawful.

#### Discrimination arising from Disability

In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified. Furthermore, employers have a duty to make reasonable adjustments to ensure that disabled applicants, employees or other workers are not substantially disadvantaged.

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### 3.0 Your Responsibilities

Each and every one of us is a stakeholder in the success of this policy. We expect you to make a positive contribution towards maintaining an environment of equal opportunity throughout the organisation. Please make sure you observe this policy at all times. In particular, you have individual responsibility to adopt the following: -

- Do not take unlawful discriminatory actions or decisions contrary to the spirit of this policy.
- Do not discriminate against, harass, abuse or intimidate anyone on account of their protected characteristics.
- Do not place pressure on any other employee to act in a discriminatory manner.
- Resist pressure to discriminate placed on you by others and report such approaches to an appropriate manager.
- Co-operate when we investigate, including providing evidence of conduct which may amount to discrimination.
- Co-operate with any measures introduced to develop or monitor equal opportunity.

Discrimination is not just treating one person less favourably than another. It can take place because: -

- Someone *associates* with a person with a protected characteristic.
- Someone is *believed to possess* a protected characteristic (even though they don't).
- Something *particularly disadvantages* people who share a protected characteristic more than others.

All employees, workers or self-employed contractors whether part time, full time or temporary, will be treated fairly and with respect.

We expect you to treat, and be treated by, other employees and the people our organisation deals with considerately and with respect.

### 4.0 Where You Encounter Discrimination

If you feel subject to discrimination, make clear to the individual concerned that you find it unacceptable. Person-to-person discussion at an early stage may be enough to resolve it without involving anyone else. Alternately, seek the help of a trusted colleague and ask them to approach whoever has caused you offence.

If discrimination continues, or you consider an instance to be particularly serious, please implement the grievance procedure. We assure you that grievances will be dealt with promptly and in a discrete and caring manner.

Should you feel an individual grievance is not appropriate to the situation, you may consider using our confidential reporting procedure.

### 5.0 Diversity and Inclusion Monitoring

Fortel will monitor the effectiveness of this policy to ensure it is achieving its objectives.

As part of this process, it will monitor:

- the composition of job applicants and decisions in recruitment
- the composition of Fortel's workforce
- access to training, promotion and other opportunities and benefits
- the impact of Fortel's employment policies, including the use of the disciplinary and grievance procedure
- dismissals and other terminations

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The HR and Payroll Manager has particular responsibility for implementing and monitoring the Equality and diversity policy and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

The policy is regularly reviewed at least annually and may be amended at any time.

A copy of this policy can be found on the Integrated Management System. Job seekers and applicants can access the policy via Fortel's website.

*Satvinder Nijjer*

Mr S. Nijjer  
**Chief Executive Officer**

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