



Equality, Diversity and Inclusion Policy

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EQUALITY, DIVERSITY AND INCLUSION POLICY

This policy covers all individuals working at all levels and grades, including (but not limited to) officers, directors, employees, consultants, contractors, trainees, interns, home workers, part time and fixed term employees, casual workers and agency staff (collectively referred to as staff in this policy).

1 OUR COMMITMENT

We are committed to providing equal opportunities to our staff, eliminating discrimination and encouraging diversity amongst our workforce. We will not tolerate unlawful acts of discrimination in respect of job applicants, employees, workers or our customers.

This policy is intended to ensure employees understand their obligations and assist the Company in putting its commitment to equal opportunities and diversity into practice.

We actively promote non-discriminatory behaviour. We will not tolerate any unlawful discrimination, and anyone found to be acting in such way will face disciplinary action that could result in dismissal without notice for gross misconduct. Everyone has a duty to report any unlawful discrimination to a member of management.

We believe that treating people with dignity and respect is an important part of realising equal opportunities and diversity, and this policy should be read in conjunction with our harassment and bullying policy.

2 OUR AIM

We aim to ensure that no job applicant, employee, worker or customer is discriminated against on the grounds of a protected characteristic. The following are protected characteristics:

- a) Age;
- b) Disability;
- c) Gender reassignment;
- d) Marriage and civil partnership;
- e) Pregnancy and maternity;
- f) Race (including colour, nationality, and ethnic or national origin);
- g) Religion or belief;
- h) Sex;
- i) Sexual orientation.

In addition, we aim to ensure that no job applicant, employee or worker is treated less favourably or placed at a disadvantage on the grounds of their part-time status or trade union activities.

This applies in the advertisement of jobs, recruitment, appointment, provision of benefits, allocation of training, promotion, disciplinary proceedings, dismissal, conditions of work, pay, giving a reference and every other aspect of employment.

3 TYPES OF UNLAWFUL DISCRIMINATION

The different types of discrimination are generally defined as follows:

- a) Direct discrimination: where a person is treated less favourably than another because of a protected characteristic.
- b) Indirect discrimination: where a provision, criterion or practice is applied that is to the detriment of

people who share a protected characteristic when compared with people who do not and is not a proportionate means of achieving a legitimate aim.

- c) Harassment: where there is unwanted conduct in relation to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless of the intention of the perpetrator.
- d) Associative discrimination: where a person is directly discriminated against because of their association with another person who has a protected characteristic.
- e) Perceptive discrimination: where a person is directly discriminated against or harassed based on a perception that they have protected characteristics even though they do not.
- f) Victimisation: where a person is subjected to a detriment because they have supported or raised a complaint under the Equality Act 2010 or are suspected of doing so.
- g) Failure to make reasonable adjustments: where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

4 RECRUITMENT AND SELECTION

Our objective is to recruit staff best able and qualified to perform the required or anticipated tasks.

The wording of any advertisements will not place unfair restrictions or requirements on a particular group or request qualifications that are not necessary for the effective performance of the job. All applications will be considered on the basis of objective criteria, such as qualifications, experience and ability to do the job.

Person specifications and job descriptions will only state requirements as necessary where they are essential for the job. Account will be taken of reasonable adjustments that may be required for applicants with disabilities.

The selection processes used will measure the suitability of the applicant in terms of the requirements for the position. Selection criteria and procedures will be kept under review to ensure that individuals are selected and promoted on the basis of relevant merits and abilities.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees must be able to produce original documents (such as a passport) before employment starts.

5 STAFF TRAINING AND PROMOTION

All employees will be given equality of opportunity and will be encouraged to progress within INFRACO. We are committed to maintaining high standards of training and personal development strictly in the context of this policy on equal opportunities. Training will not be refused on an unlawful basis.

Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.

Equal opportunities and diversity training will be provided to all new employees as part of the induction process. Managers will be given training on equality and diversity in recruitment, selection, training, promotion, discipline and dismissal.

6 DISCIPLINE AND DISMISSAL

We aim to ensure there is no discrimination in our disciplinary or redundancy processes and will examine procedures and criteria to ensure that discrimination is not taking place. The Company regularly monitors the decisions being made.

7 THIS POLICY AND EMPLOYEES

You are required to assist the Company in meeting its commitment under this policy and to avoid unlawful discrimination. Failure to do so may lead to disciplinary action, and serious acts of discrimination will lead to dismissal without notice for gross misconduct. Serious acts of harassment might also be considered to be a criminal offence.

If you feel or consider that you have been treated less favourably or placed at a disadvantage on the basis of the above, please inform your Manager or, if the complaint relates to your Manager, their Manager, so that the issue can be investigated and resolved. All complaints in relation to discrimination will be sensitively but thoroughly investigated.

We will take any complaint made under this policy seriously and assure you that you will not be penalised for raising a complaint, even if your complaint is not upheld, unless your complaint is both untrue and made in bad faith.

If you are disabled or become disabled for the purposes of the Equality Act, we encourage you to let your Manager know so that reasonable adjustments can be considered.

The Executive Directors
INFRACO DEVELOPMENTS LIMITED
June 2023