



*Efret Limited  
Smartbase, Suite 111,  
Target Road,  
Aviation Park West,  
Christchurch,  
BH23 6EA,  
England*

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## *EFRET LTD EQUALITY AND DIVERSITY POLICY*

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**Review: 22/11/2022**

**Efret Ltd** is committed to encouraging equality and diversity among our workforce, and eliminating unlawful discrimination.

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.

The organisation is also committed against unlawful discrimination of customers or the public.

**The policy's purpose is to:**

1. Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
2. 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 (gender) and sexual orientation
3. Oppose and avoid all forms of unlawful discrimination. This includes in 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.

**The organisation commits to:**

1. Encourage equality and diversity in the workplace as they are good practice and make business sense.
2. 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.

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3. This commitment includes training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination. All staff should understand they, as well as their employer, 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.

4. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any 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.

4.1 Employees who are aware of possible violations of this policy must immediately contact the Human Resources representative. Employees reporting possible violation of this policy should provide sufficient level of detail so that the issue raised can be investigated. Employees who have concern about their own safety or security or the safety or security of others in the workplace must immediately report their concerns. In the event of a life-threatening emergency, immediately contact your local police or emergency services first. Your reporting obligations to the company do not prevent you from reporting to the government or regulators conduct that you believe to be in violation of the law.

4.2 Efret is committed to promptly and efficiently reviewing all potential violations of this policy and where appropriate may conduct an enquiry or investigation. The investigation will be conducted by a member of the Board of Directors and/or other independent person.

Managers should not attempt to conduct an enquiry or investigation on their own into potential violations of this policy of which they become aware; rather they are required to follow the reporting procedures outlined above. Employees have an obligation to cooperate fully with an enquiry or investigation. Those who fail to do so or who are found to have violated this policy may be subject to disciplinary action up to and including termination of employment.

Confidentiality will be maintained to the extent possible consistent with Efret conducting a thorough inquiry or investigation and responding where appropriate.

Inquiries and investigations of potential violations will be conducted as expediently as possible without compromising the integrity of the process. If a violation is found, any appropriate remedial

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actions will be taken. Current employees who report concerns generally will be informed that the investigation has concluded and any next steps, as appropriate. However, the employee who reported the concern typically will not be informed of specific action taken with respect to other employees.

5. Efret prohibits intimidation of or retaliation against an individual because he/she objected to behaviour prohibited by this policy, reported a concern under this policy in good faith, or assisted with any inquiry or investigation under this policy. It is the responsibility of every employee who has concerns about or is aware of possible retaliatory action to contact the Human Resources representative.

6. 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 organisation.

7. Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).

8. 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.

9. Monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy. Monitoring will also include assessing how the equality policy, and any sporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

The equality policy is fully supported by senior management. Details of the organisation's grievance and disciplinary policies and procedures can be found in Efret intranet link [N:\06 HumanResource\11. Human Resources instruction](#). This includes with whom an employee should raise a grievance – usually their line manager.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

<b>Policy Editor</b>	<b>Primary Contact</b>	<b>Initial Effective Date</b>	<b>Annual Review Date</b>	<b>Approval Date</b>
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