

## EQUAL OPPORTUNITIES POLICY STATEMENT

### 1. Commitment to Equal Opportunities

Locker Group Ltd. is committed to the principles of equality for all. It will ensure equal treatment of all employees, specifically those with 'protected characteristics' as detailed in the Equality Act 2010. The business will not either directly or indirectly discriminate in relation to the following:

- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation
- Sex (gender)
- Age

The legislation covers five broad areas.

- Associative

Where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic

- Perceptive

Where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic

- Harassment

This is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

- Third Party

Where an individual is directly discriminated against or harassed by a third party – not employed by the organisation e.g. customer

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- **Victimisation**

Where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.

Employees have a personal responsibility to adhere to the principles of equal opportunity and maintaining harmony in the workplace. The business will actively promote equal opportunities to ensure that individuals receive treatment that is fair, equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Any form of discrimination or harassment will not be tolerated. The business will treat unfair discriminatory conduct or harassment by any member of staff as a potential disciplinary offence.

## **2. Grievance and disciplinary procedures**

Any employee who feels that they have been treated unfairly or subjected to direct or indirect unfair discrimination can raise the matter through the grievance procedure and every effort will be made to secure a satisfactory resolution. Any employee making a complaint of unfair discrimination will be protected from any victimisation in any form.

## **3. Recruitment**

Locker Group Ltd will ensure that the advertising and recruitment of employees is done fairly. Recruitment practices will focus on appointing the best person for the job, irrelevant of sex, race, age, disability, religion and belief. The benefits of a diverse workforce are understood and the business will endeavour to encourage the recruitment of employees from all backgrounds.

Locker Group Ltd will not discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974.

## **4. Training**

Training, development and promotion will be on the basis of budget, merit and ability and employees and applicants from all backgrounds and of all ages will be encouraged.

## **5. Equal Pay**

Men and women are entitled to be paid equally without any bias on the grounds of sex. The business will ensure that male and female employees receive equal pay for the same work and for work rated as equivalent and for work of equal value.

## **6. Harassment at work**

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by sex, race, colour, religion, belief, national or ethnic origin, age, sexual orientation, age, or disability it also amounts to infringement of equal employment opportunity.

Locker Group Ltd. is committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned.

## **7. Disability**

Locker Group Ltd. Recognise that the law prevents discrimination against disabled people. Any employee who believes that they have been unfairly discriminated against for reasons related to disability can use the grievance procedure.

Recruitment will be on the sole basis of the applicant's abilities. A disability will not itself justify the non-recruitment of an applicant. Reasonable adjustments to the application procedures will be made as required to ensure that applicants are not disadvantaged because of disability.

No applicant will be considered unsuitable for appointment or less suitable than another applicant unless full consideration has been given as to whether a reasonable adjustment can be made which will counteract the effect of his or her disability upon his or her suitability.

An action plan to remove barriers will be drawn up in consultation with the employee. The plan will address physical access to the premises, access to benefits of employment, terms and conditions of employment, recruitment and arrangements for recruitment, performance assessment, promotion and retention.

## **8. Monitor and Review**

This policy will be monitored and reviewed on an annual basis. The directors and managers of Locker Group Ltd are, and must be, committed to this policy and work continuously to improve the content, understanding, communication and implementation of this policy throughout the business.



Andrew Campbell  
Chief Executive Officer  
Locker Group  
8<sup>th</sup> January 2024