

EQUAL OPPORTUNITIES AND DIVERSITY POLICY

The purpose of this policy is to promote diversity and equal treatment to all in employment and any job applications, irrespective of their gender, race, ethnic or national origin, colour, disability, age, nationality, national origin, sexual orientation, gender reassignment, pregnancy or maternity, religion or belief or marital status (Protected Characteristics). The Company opposes all forms of unlawful and unfair discrimination.

All employees, whether part time, full time or temporary, will be treated fairly and equally. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

In 2021, the STR Group's Board investigated to find out what more could be done as a business. They appointed a senior external EDI consultant to provide guidance and a training workshop, and an initial pathway was decided upon, STR then created its own EDI Board in 2022, made up of volunteers throughout the Group, with a view on setting aims and objectives for the business through an inclusive policy focused on improving diversity and providing equity for all.

OUR COMMITMENT

- Every employee is entitled to a working environment which promotes dignity and respect to all.
- The commitment to diversity and equality in the workplace is good management practice and makes sound business sense.
- Breaches of our Equal Opportunities and Diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.
- All managers are expected to set an appropriate standard of behaviour and ensure that those they manage adhere to this policy.
- This policy is fully supported by senior management which has overall responsibility for this policy.
- The policy will be monitored and updated as required in order to comply with the Company's legal obligations. The Company aims to review this policy annually.
- The department responsible for the effective operation of the Company's Equal Opportunities Policy is Human Resources.

TYPES OF DISCRIMINATION

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct Discrimination** occurs when a person is subjected to less favourable treatment on the grounds of a Protected Characteristic. For example, rejecting a job applicant because they have a disability.

- **Indirect Discrimination** occurs when a requirement or condition is imposed, which adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time may adversely affect women because they generally have greater childcare commitments than men. However, this may be justified if the job genuinely requires full time hours, for example to meet client need.
- **Victimisation** occurs where a person is treated less favourably by virtue of any complaint they have made or supported in connection with their discrimination or harassment.
- **Harassment** occurs when a person is subjected to unwanted conduct that has the purpose or effect of (a) violating someone's dignity, or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment. This includes sexual harassment. Harassment is dealt with further in our Prevention of Bullying and Harassment at Work policy.
- **Disability discrimination** also occurs where there is any unjustified less favourable treatment because of the effects of a disability, or failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

EMPLOYEES' LIABILITY

Employees have a personal responsibility not to practice, induce or encourage any form of unlawful discrimination against applicants for employment or their fellow employees, clients, candidates, suppliers and visitors. This applies both in the workplace, outside the workplace when dealing with work-related contacts and on work-related events including social events. Failure to comply with this policy will result in disciplinary action being taken against the employee in question. Employees should be aware that in certain circumstances if they are guilty of discrimination they may be personally liable for their actions in a court of law. The Company also asks any employee to report any suspected or actual discriminatory acts to the person responsible for this policy who will take the appropriate action.

RECRUITMENT AND SELECTION POLICY:

1. Advertising vacancies

- 1.1. Wherever possible, all vacancies shall be advertised simultaneously, internally and externally.
- 1.2. Wherever possible steps shall be taken to ensure that knowledge of the vacancies reaches unrepresented groups internally and externally, by notifying job centres, careers office, schools, colleges, universities, etc.
- 1.3. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. All vacancy advertisements shall include an appropriate short statement on equal opportunities and identify the Company as an equal opportunity employer.

2. Recruitment and selection

- 2.1. Selection criteria, i.e. job description and employee specification shall be kept under review to ensure that the criteria are justifiable and non-discriminatory and are essential for the effective performance of the job.
- 2.2. Wherever possible, more than one person should be involved in the selection interview and recruitment process and all should have received training in equal opportunities.
- 2.3. Individual Candidates shall be assessed according to their capability to carry out a given job. Questions should relate to the requirements of the job. If it is necessary to assess whether personal circumstances may affect job performance, this should be done objectively.
- 2.4. Assumptions that only certain types of person will be able to perform certain types of work should not be made.
- 2.5. Recruitment solely or primarily by word of mouth should be avoided if its effect is, or may be, to prevent certain types of person from applying.
- 2.6. Where the Company's arrangements for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or if that is not reasonably practicable, reduce the disadvantage unless objectively justified.
- 2.7. Job applicants should not be asked about health or disability before a job offer is made without the approval of the HR Department. Approval for such questions will only be given where one of the limited exceptions apply, for example:
 - Where the question is necessary to establish if a job applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
 - Where the question is to establish if a job applicant is fit to attend an assessment or if there are any reasonable adjustments that may be needed to the selection process.
- 2.8. Where necessary, job offers can be made conditional on a satisfactory medical check.
- 2.9. Written records of interviews and reasons for appointment and non-appointment should be kept.
- 2.10. To ensure that this policy is operating effectively, and to identify groups that may be underrepresented in the Company, we may monitor job applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Where equal opportunities monitoring is

undertaken as part of the recruitment process, such information will not form part of the selection or decision-making process.

3. Promotion, transfer and training

- 3.1. Assessment criteria and appraisal schemes shall be kept under review to ensure that they are non-discriminatory and can be genuinely justified.
- 3.2. Unrepresented groups will be encouraged to apply for training and employment opportunities.
- 3.3. If necessary, special training shall be provided for such groups to prepare them to compete on equal terms for jobs and promotion.
- 3.4. All promotions or transfers will be made strictly on merit.
- 3.5. Any training provided will be strictly for proper performance of the employee's role.
- 3.6. Promotion and career development patterns will be monitored to ensure that access is not being unjustifiably restricted or excluded to particular groups of workers.
- 3.7. Wherever possible efforts will be made to identify and remove unnecessary and/or unjustifiable barriers and provide appropriate facilities to meet the special needs of disadvantaged and/or unrepresented groups of workers.
- 3.8. Where the Company's arrangements in relation to promotion, transfer or training put disabled workers at a substantial disadvantage for a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless objectively justified.

4. Terms of employment, benefits, facilities and services

- 4.1. The terms of employment, benefits, facilities and services available to workers shall be kept under review to ensure that they are provided in a way that is non-discriminatory and do not place particular groups of workers at a disadvantage.
- 4.2. Part-time workers shall receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified.
- 4.3. Where the Company's arrangements relating to terms of employment, benefits, facilities and services put disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements shall be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless otherwise objectively justified.

5. Disability

- 5.1. If an employee is disabled or becomes disabled, they are encouraged to tell their manager about the condition so that appropriate support can be provided.
- 5.2. If an employee experiences difficulties at work because of their disability, they should contact their manager or the HR department to discuss any reasonable adjustments that may help overcome or reduce the difficulty.

6. Personnel Records

- 6.1. In order to ensure the effective operation of the equal opportunity policy, records may be kept of all employees' and job applicants' gender, racial origins and disability.
- 6.2. Where necessary, employees will be able to check/correct their own records. Employees should advise of any changes to their personal information straight away.
- 6.3. With the exception of 6.2 above, access to this information will be strictly restricted to assessing the effective operation of this policy. The records will not be released to any third party, unless required or permitted by law, without the employees' express consent.
- 6.4. The records will be analysed regularly and appropriate follow-up action taken if necessary.

7. General

- 7.1. The Company shall ensure that all managers and supervisors are provided with appropriate equal opportunities training, which is updated as necessary.
- 7.2. The Company will ensure that this policy is known to all its employees and where applicable, job applicants.
- 7.3. Any complaints regarding the operation of this policy, or any other matters relating to equal opportunities within the Company shall be investigated through the Company's internal Grievance Procedures or through our Prevention of Bullying and Harassment at work policy.
- 7.4. There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately in bad faith will be treated as misconduct and be dealt with under our Disciplinary Procedure.

Failure by an employee to comply with any aspect of the Equal Opportunities and Diversity Policy will be regarded as misconduct which will be dealt with under the Company's Disciplinary Procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal.