



EQUALITY AND DIVERSITY POLICY

Our commitment and vision

We are committed to ensuring equality of opportunity and fairness in all areas of employment and to valuing the diversity of our colleagues, clients and people living within our local communities.

Our commitment lies at the heart of our promise to provide outstanding client service by maintaining the highest standards of professional excellence. We are committed to recruiting, training and promoting the best person for the job and encouraging all our colleagues to reach their full potential, regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

We are also determined to create a working environment which supports our Vision and Values, and which is free from any form of discrimination, harassment or bullying and within which all individuals are treated with respect, fairness and courtesy.

Shared responsibility

Leadership

We will support and encourage our colleagues in their responsibility to implement this policy by providing training, written information and guidance in our HR policies and expert guidance and advice, where appropriate.

Our progress and successes are regularly monitored and reported to the Board and communicated internally and, where appropriate, externally.

Your responsibility

You are required to comply with the policy in all of your dealings with clients, colleagues and anyone else with whom you come into contact during the course of your employment or engagement, for example contractors or agency staff (cleaners, catering staff etc). The policy and principles underlining our commitment applies not only when you are working on our premises or at those of any client or contact, but also includes work-related social events, hospitality events and travelling or staying away from home whilst on business.

It is everyone's responsibility to ensure the policy is implemented. Any breach of this policy may be treated as a disciplinary offence resulting, if appropriate, in disciplinary action.

Scope of the policy

This policy applies to everyone working at A.T.P.B. LTD including employees, partners, temporary or agency workers, trainees, work experience students, secondees, contractors and consultants as well as potential new employees and recruitment candidates. It affects how we work with our clients and our suppliers of goods and services.

This policy covers the following matters:

- Recruitment, selection, learning and development and promotion
- Terms and conditions of employment/terms of engagement
- Disability
- Procurement
- Discrimination, victimisation and harassment
- Our obligations
- Complaints procedure
- Monitoring

It accepts and reiterates our responsibilities under UK anti-discrimination and equality legislation and the Human Rights Act 1998.

Recruitment, selection, learning and development and promotion

A.T.P.B. LTD will ensure that information about job opportunities is circulated as widely as possible in the circumstances to ensure that it reaches all sections of the community. All applications are welcomed and are considered for selection on the relative merits of the applicant against the job and/or person specification for the position regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins. However, if there is a genuine and lawful reason for limiting the vacancy to a particular group, this reason and the grounds for it will be clearly stated on any advertisements.

We retain the discretion to invite applications from individuals whose job may be at risk of redundancy or who require redeployment for health or disability reasons before advertising the vacancy more widely.

Applicants are asked to complete a monitoring form to assist in the maintenance of records and for monitoring purposes. This form is kept separate from all other application documents and will not form part of the selection process. We continue to monitor progress in promoting equality in our recruitment procedures.

We aim to provide everyone with the appropriate learning and development opportunities to enable them to improve their performance and achieve the performance targets set for them. Opportunities for learning and development are available to everyone based on role/needs of the job and encouraging personal development. Promotion within A.T.P.B. LTD is based on merit and the reasonable requirements of the job only.

Sub-contractors are instructed on the basis of their skills, experience, ability and cost and not on the grounds of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities.

We will work closely with the client (involving the Client as appropriate) to agree the instruction of a sub-contractor who is the most appropriate for the matter under consideration.

Terms and conditions of employment/engagement

We ensure that terms and conditions of employment/terms of engagement are free from all forms of direct and indirect discrimination and apply equally regardless of age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Our grievance and disciplinary procedures will operate without discrimination.

Disability

We value the individual contribution of all colleagues and prospective employees from all sectors of the community. We are committed to facilitating the employment of people with disabilities and retaining individuals who become disabled whilst with us wherever practicable and in order to achieve this, we apply the following principles. We will:

- Take reasonable steps to ensure that the working environment, working practices, terms and conditions of employment and terms of engagement do not prevent disabled people from taking up positions for which they are suitably qualified and the best person for the job
- Avoid, remove or alter the barriers to the employment of disabled people, wherever possible when acquiring and fitting out buildings with equipment and devising working practices
- Make reasonable adjustments to recruitment arrangements, the working environment, working practice's role responsibilities and to terms and conditions of employment so as to ensure that no particular disabled person is placed at an unreasonable disadvantage
- Ensure that any decision not to make an adjustment which might enable or assist a colleague or prospective colleague will not be taken below the level of the Senior Office Partner after consultation with the HR Department. Before making such a decision, we will ensure that all possible adjustments have been fully investigated, including consultation with the individual concerned and any appropriate expert advice
- Ensure that any colleague who becomes disabled whilst in employment will be given the full support of A.T.P.B. LTD to continue in their own job (where practicable and having put in place any reasonable adjustments) or is offered a move to an alternative job appropriate to his/her experience and abilities, if available
- Respond promptly (within 14 days) to requests for reasonable adjustment from our colleagues albeit further discussions and investigations may well be needed
- Encourage the participation of disabled colleagues to ensure that, wherever possible, our employment practices recognise and meet their needs
- Consult disabled colleagues on action to make sure they develop and use their abilities at work
- Continue to provide services and facilities to clients with disabilities.

Further guidance can be obtained on an entirely confidential basis from the HR Department. If you know or believe you might be disabled, you are encouraged to discuss this with the HR Department so that we can ensure you achieve your full potential and that we comply with our responsibilities.

Procurement

We will ensure that the way in which we purchase goods, services and facilities reflects our commitment to equality and diversity. We will put procedures in place to ensure that suppliers from diverse communities have appropriate opportunities in competing for contracts and we will take

action to encourage such businesses through our supply chains, to comply with their anti-discrimination responsibilities and best practice on diversity issues.

Discrimination, victimisation and harassment

Discrimination and victimisation

A person has been discriminated against if they are treated less favourably than another on the grounds of age, gender, marital status, race or ethnicity, nationality, disability of any kind (including physical, sensory and mental disability), religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Discrimination also includes harassment, bullying or victimisation on any of these grounds.

Harassment

Harassment is unjustified, unreasonable or inappropriate treatment of, or behaviour towards another person which causes them distress, discomfort or worry. Harassment may include bullying. Harassment may be discriminatory when it is on the grounds of another's age, gender, marital status, race or ethnicity, nationality, disability, religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities. Harassment will be unlawful discrimination if:

- Unwanted conduct takes place
- It is on discriminatory grounds
- With the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.
- Where it is reasonable to form the view that this is the impact of the offending behaviour.

The following types of behaviour may amount to harassment:

- Physical assault
- Physical or verbal abuse including threats
- Suggestive comments or gestures
- Suggestive or offensive emails
- Insulting or abusive behaviour or comments
- Isolation or exclusion from work opportunities, corporate, social or sporting events
- Persistent criticism or humiliation
- Unfair allocation of work or responsibilities.

This list gives examples only and is not exhaustive.

Sexual harassment

The following types of behaviour may amount to sexual harassment:

- Physical conduct of a sexual nature
- Unwanted physical contact or conduct even if not obviously sexual including unnecessary touching, brushing against another individual, uncomfortable proximity
- Verbal conduct of a sexual nature including unwelcome sexual advances, continued suggestions of social activity outside work after it has been made clear that this is unwelcome, suggestions that sexual favour may further a career (or refusal may hinder it)

- Behaviour or treatment which an individual faces because they will not submit to invitations of a sexual nature or unwelcome advances, including social invitations e.g. a date
- Insults, ridicule or teasing of a sexual nature, insults related to gender or sexual orientation, offensive comments about appearance or dress, talk or jokes of a sexual nature which a person present has indicated they dislike
- Display of sexually suggestive or pornographic pictures, or sending such items electronically sending sexually harassing messages or images through email

Again, this list gives examples only and is not exhaustive. Sexual harassment by someone of the same sex as the victim is also covered by this policy.

Homophobic bullying and harassment

The following types of behaviour may amount to homophobic bullying and harassment:

- making homophobic insults and threats
- making unnecessary and degrading references to an individual's sexual orientation
- engaging in banter or making jokes which are degrading to a person's sexual orientation or perceived sexual orientation
- outing an individual as lesbian, gay or bisexual (LGB) without their permission
- ignoring or excluding a colleague from activities because they are LGB
- spreading rumours or gossip about an individual's sexual orientation
- asking an LGB colleague intrusive questions about their private life
- making assumptions and judgements about a colleague based on their sexual orientation
- using religious belief to justify anti-gay bullying and harassment.

Again, this list gives examples only and is not exhaustive.

Consequences of discrimination, victimisation and harassment

Any behaviour involving discrimination, victimisation or harassment of another on the grounds of age, gender, marital status, race or ethnicity, nationality, disability of any kind (including physical, sensory and mental disability), religion or religious or other beliefs, sexual orientation, social or educational background or family or care responsibilities will not be tolerated. Such behaviour may amount to gross misconduct in which case disciplinary action (including dismissal for serious offences) will be taken against any person breaching this policy.

Our obligations

A.T.P.B. LTD believe that we all have the right to work in an environment which promotes equality of opportunity and prohibits discriminatory practices. We do not tolerate any form of discrimination, victimisation or harassment by or against our people.

We should be fully aware of the behaviour that can constitute discrimination, victimisation and harassment. It is the responsibility of each of us to be sensitive towards the individual needs of all, whether they be related to any disability, cultural or religious background, personal circumstances, or any other relevant factor. We must be conscious of the impact that we have on others and not to discriminate against, harass or bully colleagues or condone discrimination, harassment or bullying by others. All of us must behave in a way that supports this policy and treat each other with respect, courtesy and dignity in line with our Vision and Values. If you have experienced behaviour which you

believe falls short of the standard we require and which is not in line with our Vision and Values, please refer to our grievance procedure.

Complaints procedure

Our collective responsibility

All of us must comply with this policy and report any incidents or alleged incidents to our manager or to the HR Department. Anyone who believes they are the victim of discrimination, victimisation or harassment should where possible raise the matter with the person against whom they have the complaint and attempt to resolve the matter without recourse to any formal procedure. You are encouraged to use the complaints procedure which is part of this policy.

Failure to comply with this policy or to co-operate with it operating effectively is a disciplinary offence which may lead to disciplinary action including dismissal.

In the event of a complaint which falls within this procedure, it is our aim to reach a resolution as quickly as possible and as informally as possible. All complaints will be treated seriously and with appropriate confidentiality.

Duties of managers

It is the responsibility of all managers to ensure the implementation of this policy and to ensure compliance. Where a manager becomes aware of an allegation of discrimination, victimisation or harassment against a colleague or a member of the public in connection with A.T.P.B. LTD' activities, he/she must discuss it with the complainant. Your HR Department can provide further advice and support.

Making a complaint

If you feel you have experienced or are experiencing any form of discrimination, harassment or bullying, please consider in the first instance whether it is appropriate to raise the matter directly with the person concerned. If it is not appropriate to do so, or you feel unable to do so, please discuss the matter with your manager. If you feel unable to do this, the appropriate point of contact is your HR Department.

Following initial discussions with your manager or the HR Department, you will be asked to choose one of the following options:

- No further action necessary
- Discuss the complaint directly with the individual who is alleged to have caused offence
- Ask your manager/HR Department to help you resolve the matter through informal approaches
- Make a formal written complaint to the HR Department. This will initiate a full investigation and if appropriate, recourse to the disciplinary procedure.

If the alleged discrimination, victimisation or harassment involves a client or an employee of a client, or if an employee of a client is alleged to have acted in a discriminatory or harassing manner, appropriate action to deal with the problem will be discussed with the person making the complaint.

Investigation

Once a formal written complaint has been made, the first step is to investigate the allegations as carefully and discreetly as possible. This will involve hearing detailed accounts from both parties - others may also be asked to provide information. Documents, emails and other evidence may be considered. A full record of the progress and outcome of the investigation and any steps taken will be reported to the complainant at the earliest opportunity. Those conducting the investigation will not be parties directly involved in the allegation.

In extreme cases (for example, where it is felt that others could be at risk if no action is taken), we may need to investigate and take disciplinary action even if a formal written complaint is not made.

Disciplinary procedure

If the investigation concludes that there appears to be substance to the complaint, it will normally be appropriate for the disciplinary procedure to be initiated. The Disciplinary Procedure is set out in full on our HR policies intranet site. Modifications to the procedure may be necessary to reflect the sensitive nature of the allegations.

We would normally seek the agreement of the complainant prior to commencing disciplinary action. However, there may be occasions where despite the views of the complainant, we may need to pursue the matter formally. The matter will be dealt with promptly, fairly and impartially. Care will be taken to ensure that the reputation of each party is not unjustly affected during any investigation.

We will protect individuals who make a complaint or assist in an investigation from harassment and victimisation. Any acts of retaliation or intimidation against the complainant will be treated as a disciplinary matter.

If the complaint is not upheld

If the complaint is not upheld, we will advise the individual bringing the allegation and provide an explanation for and the reasoning behind the decision made.

Individuals who maliciously make an unfounded complaint will be subject to disciplinary action.

Victimisation

Any person raising a concern under this policy whether informally or formally will be protected against any adverse treatment from colleagues. It is victimisation to penalise or retaliate against a person who brings complaints of discrimination or harassment in good faith, through any form of less favourable treatment. Any person who does victimise will be subject to disciplinary action, if appropriate and following an investigation. Anyone who considers that they have been victimised should raise this with their manager or the HR Department without delay in accordance with the complaint's procedure.

Managers who observe harassment, discrimination/victimisation have a duty of care and responsibility to act and should:-

- talk to the individual to see if concerns arise;
- consider action whether informal or formal in more serious cases;
- seek advice from HR.

Monitoring

We are committed to monitoring the effectiveness of this Equality and Diversity Policy and the associated complaints procedure. We undertake to regularly review all our policies, procedures and practices in relation to recruitment and selection, terms and conditions of employment, learning and development opportunities, career development, promotion and grievance and discipline to ensure they comply with any legislative changes and good practice. We will endeavour to identify and take all steps necessary to eliminate any unjustified discrimination or victimisation which is revealed by this monitoring process, and which is required to achieve our commitment and vision for equality and diversity

A handwritten signature in dark ink, appearing to read 'A. Townsend', with a stylized, wavy flourish at the end.

Sign:

Print: Aaron Townsend

Date: 02/03/2026