

4.4 EQUAL OPPORTUNITIES POLICY

1. Introduction

STC Limited (“the company”) recognises that it provides equal opportunities to all persons without discrimination. This policy sets out the company’s position on equal opportunity in all aspects of employment, including recruitment and promotion, and provides guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, disability as defined by the Disability Discrimination Act (as amended) and the provisions of the Equality Act 2010, part-time and fixed term contract status, age, sexual orientation or religion.

2. Definition of Discrimination

Discrimination can be direct or indirect. Both forms of discrimination must be avoided.

Direct discrimination occurs when one person is treated less favourably than another on grounds relating to sex, race, marital status, age, disability, sexual orientation or religion.

Indirect discrimination occurs where a requirement is imposed which can be complied with by a smaller proportion of persons of a particular sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, than persons in another group and which is not objectively justifiable in the given situation. Examples include:

- Seeking job applications only from persons under 27 years of age and with five years’ experience
- Demanding technical qualifications for a job which are not strictly necessary; and
- Sending only full time employees on training courses.

3. Statement of policy

The aim of this policy is to communicate the commitment of the Chief Executive and management team to the promotion of equality of opportunity in STC Limited.

It is our policy to provide employment equality to all, irrespective of:

- Gender, including gender reassignment
- Marital or civil partnership status
- Having or not having dependants
- Religious belief or political opinion
- Race (including colour, nationality, ethnic or national origins)
- Disability
- Sexual orientation
- Age
- Pregnancy and Maternity

We are opposed to all forms of unlawful and unfair discrimination. All job applicants, employees and others who work for us will be treated fairly and will not be discriminated against on any of the above grounds.

Decisions about recruitment and selection, promotion, training or any other benefit will be made objectively and without unlawful discrimination.

We recognise that the provision of equal opportunities in the workplace is not only good management practice; it also makes sound business sense. Our equal opportunities policy will help all those who work for us to develop their full potential and the talents and resources of the workforce will be utilised fully to maximise the efficiency of the Company.

4. To whom does the policy apply?

The Equal Opportunities policy applies to all those who work for (or apply to work for) the Company, for example:

- Job applicants and potential applicants
- Employees
- Contract workers

- Agency workers
- Trainee workers and students on work experience or placements
- Volunteer workers
- Former employees.

5. **Equality commitments - We are committed to:**

- Promoting equality of opportunity for all persons
- Promoting a good and harmonious working environment in which all persons are treated with respect
- Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation
- Fulfilling all our legal obligations under the equality legislation and associated codes of practice
- Complying with our own equal opportunities policy and associated policies
- Taking lawful affirmative or positive action, where appropriate
- Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings.

6. **Implementation**

The Chief Executive has specific responsibility for the effective implementation of this policy. The management team and team leaders/supervisors also have responsibilities and we expect all our employees to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy we shall:

- Communicate the policy to employees, job applicants and relevant others (such as contract or agency workers)
- Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff
- Provide equality training and guidance as appropriate, including briefing/training on induction.
- Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in nondiscriminatory selection techniques
- Incorporate equal opportunities notices into general communications practices (e.g., staff newsletters, posters, notice boards)
- Endeavor to obtain commitments from other persons or organisations such as subcontractors or agencies that they too will comply with the policy in their dealings with our organisation and our workforce
- Ensure that adequate resources are made available to fulfill the objectives of the policy.

7. **Monitoring and review**

We will establish appropriate information and monitoring systems to assist the effective implementation of our equal opportunities policy.

The effectiveness of our equal opportunities policy will be reviewed regularly [at least annually] in consultation with our work force and action taken as necessary.

8. **Complaints**

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the agreed company Grievance Procedures. A copy of these procedures is available from the Office.

All complaints of discrimination will be dealt with seriously, promptly and confidentially.

In addition to our internal procedures, employees have the right to pursue complaints of discrimination to an employment tribunal under the following anti-discrimination legislation:

- Equal Pay Act (1970) as amended
- Disability Discrimination Act 1995, as amended
- Race Relations Act (1976 & 2000) and Race Relations (Amendment) Act Regulations
- Sex Discrimination (Gender Reassignment) Regulations
- Employment Equality (Sexual Orientation) Regulations
- Employment Equality (Religion or Belief) Regulations

- Employment Equality (Age) Regulations

However, employees wishing to make a complaint to a tribunal will normally be required to raise their complaint under our internal grievance procedures first. Every effort will be made to ensure that employees who make complaints will not be victimised. Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action and may warrant dismissal.

This policy will be regularly reviewed (minimum annually).

Signed on behalf of STC Limited

A handwritten signature in black ink, appearing to read 'Pippin Newman', is placed over a light grey rectangular background.

Pippin Newman
Chief Executive
February 2025

Review Date: February 2026