



Equal Opportunities and Diversity Policy

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INTRODUCTION

LOMGroup is fully committed to being an equal opportunities employer, and is opposed to all forms of unlawful and unfair discrimination. LOMGroup believes the skills, capability and talent of its employees are the key to its success. There are great benefits to be gained from diversity and variety in a workforce and LOMGroup

This policy intends to ensure that all LOMGroup job applicants, employees (temporary and permanent), and contract workers are treated fairly, and are offered equal opportunity in selection, training, career development, promotion and remuneration. The policy also intends to ensure that employees are recruited, promoted and rewarded on the basis of merit, ability and performance. Specifically, our aim is to ensure that:

- we have access to the widest labour market and secure the best employees for our needs;
- people are selected, promoted and treated equally, enabling us to maximise potential to the benefit of individuals and LOMGroup;
- we have employment procedures and practices which do not discriminate on grounds of age, gender, marital status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or religious belief, disability, pregnancy or maternity and sexual orientation;
- we treat all those with whom we come into contact with respect;
- we meet our statutory obligations regarding employment legislation,
- we communicate the Equal Opportunity Policy and responsibilities for achieving fairness and equality;
- senior managers understand their responsibility for enforcing the Equal Opportunity Policy, and we all share responsibility for upholding the Equal Opportunity Policy.

We also aim to ensure that all customers and those with whom we come into contact are treated with respect, and have full access to our products and services.

The purpose of this policy therefore is to:

- Explain the LOMGroup principles on equality and diversity
- Provide a framework for putting the principles into practice
- Explain the types of behaviours that are not acceptable.

1. Legal background and framework

The Equality Act 2010 offers protection to individuals with 'protected characteristics' and ensures that they are not treated less favourably because of their:

- gender, marital status, gender reassignment (collectively "sex");
- race, colour, nationality and ethnic or national origin (collectively "race");
- religion or religious belief (collectively "religion");
- disability;
- pregnancy and maternity;
- age; or
- sexual orientation.

Discrimination is unlawful when it takes place on the grounds of any one of the above characteristics. Additionally, the law prohibits:

- paying different rates of pay to men and women for the same work, work rated as equivalent, or work of equal value (i.e. there is a right to equal pay);
- treating part-time or fixed term employees less favourably than comparable full-timers unless the treatment is justified on objective grounds;
- giving instructions or putting pressure on others to discriminate;
- victimising individuals who have made allegations or brought claims of discrimination or assisted others to do so; or
- harassment of colleagues and third parties we deal with in the course of our work (e.g. customers, suppliers, visitors)

2. What is harassment and bullying?

The essential characteristic of harassment is that it is unwanted by the recipient and it is for each individual to determine what behaviour is acceptable to them and what they regard as offensive. Therefore, it is not what you intended that counts, it is how it was received. A single act can constitute discrimination or harassment if it is serious enough.

Harassment is defined as “*unwanted conduct based on any of the above grounds of discrimination which is intended to or actually violates people’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.*”

The following are examples of sexual/racial/religious/sexual orientation harassment:

- "jokes" about sex/race/religion or sexual orientation;
- sexually suggestive remarks or offers for advancement in return for sexual favours;
- sexually explicit, derogatory remarks or inappropriate physical conduct which is offensive to the individual involved and which causes him or her to feel threatened, humiliated, patronised or harassed; or which interferes with his or her job performance; undermines job security or creates an intimidating work environment;

2. What is harassment and bullying? cont'd

- displaying or sending sexually explicit material;
- displaying or sending racially offensive material;
- nicknames, teasing or name calling related to sex, race, religion or sexual orientation;
- displaying flags, emblems or religious slogans which some may find offensive;

Incidents of harassment can occur outside the work place at work-related events such as social evenings or on business trips.

Bullying is not a form of discrimination. However, it is unacceptable conduct. Bullying means offensive, intimidating, malicious or insulting behaviour; an abuse or misuse of power intended to undermine, humiliate, denigrate or injure a colleague. A legitimate or constructive criticism of employees' performance or behaviour, or an occasionally raised voice or an argument, does not normally constitute bullying behaviour.

Examples of bullying include ridiculing or demeaning others (particularly junior colleagues), overbearing supervision and unjustifiably excluding colleagues from meetings or other communications. Bullying could result in an action for civil or criminal assault and any such behaviour will result in disciplinary action.

3. What are the consequences of discrimination at

Discrimination and harassment are unlawful and there can be serious penalties if a claim for discrimination is upheld. If the harassment includes physical abuse there may also be civil or criminal liability, e.g. for indecent assault or assault and battery.

4. What are the consequences if I discriminate?

You may be personally liable for acts of discrimination or harassment which you commit, authorise, contribute to or condone. If there is sufficient reason to believe you have discriminated against someone or harassed them, this will be considered a disciplinary offence and you may be summarily dismissed for gross misconduct

5. Who is responsible for equal opportunities?

The short answer is - we all are!

We all have responsibilities towards those we deal with in the course of our work, and we can all be held personally liable for discrimination. If you are concerned about behaviour you observe at work, you should raise it with your manager or HR Director. If you do raise an issue in good faith, which you reasonably believe is true, you can be assured that LOMGroup will do everything possible to ensure that you do not suffer any adverse consequences as a result.

If you manage others, you should ensure that your team is aware of this policy. Inappropriate behaviour, i.e. discrimination, unfair treatment, harassment, bullying, victimisation or disrespect, is a serious issue and must be managed under LOMGroup's Disciplinary procedures. If someone else raises an issue with you, either for someone else or themselves, you should also treat this seriously and in line with LOMGroup's Grievance Procedure.

6. How do we achieve fairness in terms of selection and promotion?

We aim to identify the requirements of the job, and then to appoint the most appropriate person for the job. All appointments are based on merit and take all relevant criteria into account. If you are applying for a job, or resourcing one, the following should be fair and justifiable:

- job and person specifications;
- sources of applicants (via internal/external advertisements, consultants etc);
- selection criteria;
- selection process/methodology (shortlisting from application forms/CVs, interviewing, assessment centres, psychometric testing); and
- selection decisions.

See also the Recruitment and Selection Policy.

6.1 Terms and conditions of employment?

Across all elements of your employment with LOMGroup, we aim to be commercial and fair. Your employment terms and conditions will be agreed based on the needs of the business, statutory obligations, market comparisons and the concept of everyone having a fair share in the success to which they contribute. Your remuneration (including salary and bonus), will be within the relevant salary range for your role and based on merit and your performance in the job.

If you are an established employee, whether full or part time, you will be eligible for a range of benefits depending only on your role. You will be informed about these in your contract of employment and via other policies.

If you work part time, your benefits will be pro-rated to your hours of work unless stated otherwise.

If you are on a fixed term or temporary contract you will be informed about your terms.

6.2 Training?

If you are an established employee, whether full or part time, you will be provided with appropriate training to enable you to do your job. LOMGroup doesn't set a target number of days for training each year, but everyone should discuss their training needs with their manager and participate in whatever training is considered necessary. Training may also be provided to those on fixed term or temporary contracts, if

6.3 Performance management and career development?

You are encouraged to discuss personal and career development activities with your manager which will help you achieve your goals. In these discussions, you and your manager can agree appropriate training and development plans which will assist you to perform your role, as well as contributing both to LOMGroup's success and your own career development. This is available to all employees and is managed via the Performance Management processes. Within these processes, assessment criteria should be applied equally and fairly.

6.4 Selection for redundancy or short-term working?

LOMGroup will seek to avoid redundancy wherever possible. If redundancy becomes necessary, and choices have to be made, these will be primarily on the basis of the need for the role to exist, and ability and performance.

6.5 Opportunities for those who are disabled?

If you are disabled you will be considered on merit in all areas of employment (e.g. recruitment, promotion, training etc), equally and fairly with others, and we will provide the necessary facilities, wherever practicable. You are encouraged to discuss your disability with us to enable us to be in the best position to help you. If you are an employee and you become disabled, the company will make every practicable effort to support you if you are able, and wish to, continue working. Your manager, Human Resources and Health and Safety will consult with you to establish your special needs and how reasonable adjustments can be made to meet them to enable you to perform your job (subject to medical advice and meeting any statutory requirements).

7. Visitors to

There are access and toilet facilities for disabled people in our Palace Street offices (if you are receiving visitors at another location you should check local arrangements). If you have visitors who are disabled, you should note any visible disability (e.g. impaired mobility or vision) so that extra assistance can be provided if necessary in an emergency; the designated Marshall and/or the person receiving the visitor is responsible for assisting their disabled visitor from the premises in an emergency.

8. Monitoring Procedures

To ensure that this policy is operating effectively, we will maintain records of employees and (where possible and for a limited period of up to 6 months) job applicants' gender and personal details. We collect this information via application forms and speculative applications. Employee data is recorded on a secure Human Resources database, which is accessed only by authorised personnel. Human Resources monitors salary ranges and actual pay to ensure that any differences are justified on the grounds of merit and performance.

All managers are responsible for adhering to this Policy and monitoring its effect within their own department. If they observe any behaviour or trends which they believe contravene this policy they should raise them with their senior manager and/or Human Resources Director immediately.