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| Policy title: <b>Equality and Diversity Policy</b>                                |  |
| Approved by: Craig Golby  |  |
| Position: Managing Director   |  |
|  |  |
| Signature:  |  |
| Version no: 3   | Revision date: 02/02/2026  |

## Introduction

Siamo Group is committed to promoting a supportive and inclusive culture for all of our employees and promoting equality under the Equality Act 2010.

The Equality Act 2010 provides a framework of protection against direct and indirect discrimination, harassment, and victimisation. It provides protection for people discriminated against because they have, are perceived to have, or are associated with someone who has a protected characteristic.

## Nine Protected Characteristics

The nine protected characteristics are;

- Age
- Sex (gender)
- Race
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Religion or Belief
- Sexual Orientation.

## Aims

Siamo Group will work to ensure that employees are;

- treated fairly and without discrimination during their employment, commencing with the recruitment process and continuing with access to promotions when available based only on merit.
- fairly appraised and rewarded for personal contributions to the organisation, taking into account internal and external comparisons and affordability.
- able to work in a healthy and safe environment free from hazards.
- able to access opportunities for training and experience to develop to their full potential.
- supported in balancing work and home life commitments and to have such requests considered objectively.
- treated with dignity and respect in a fair and consistent manner in an environment where inappropriate behaviour is not acceptable.

## Roles and Responsibilities

All employees are expected to abide by the requirements of the Equality Act 2010.

Specifically discrimination is prohibited in:

- The less favourable treatment of an employee based on the grounds of at least one of the nine protected characteristics.

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- Expecting an employee to comply with requirements related to their employment, which are different to the requirements for other employees solely on the grounds of one or more of the nine protected characteristics.
- Imposing a work requirement (which is not vital to the business) which is more onerous on an employee due to their protected characteristic than it is on employees without that protected characteristic: An example would be setting a dress code where women are required to wear high heeled footwear.
- Victimisation of an employee.
- Harassment of an employee (regarded as discrimination).
- Any other act, or omission of an act, that disadvantages an employee or applicant in the workplace purely on the grounds of one or more of the nine protected characteristics, such as in disciplinary matters, consideration for training, promotion, or any other instances where there is a requirement to make a judgement or decision between employees. It is essential that employees are evaluated objectively on merit, experience, skills, actions, and temperament.

### **Recruitment of people with a criminal record**

The Rehabilitation of Offenders Act 1974 (Exceptions) Order provides a framework for the recruitment of people who have a criminal record.

Siamo is committed to treating all applicants fairly, and will therefore;

- select all candidates for interview based on their skills, qualifications, and experience.
- only submit an application for a criminal record check to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned, or where required by our client in order to proceed with the employee placement in a position where a criminal record check is identified as necessary.
- Include a statement in job adverts where an application for a DBS certificate is required for the position; and will obtain signed permission from the individual offered the position before the DBS application is made.
- only ask an individual to provide details of convictions and cautions that Siamo are legally entitled to know about. Where a DBS certificate, standard or enhanced level, can legally be requested (a position included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and appropriate Police Act Regulations as amended)
- only ask an individual about convictions and cautions that are not protected.
- make every subject of a criminal record check submitted to DBS aware of the existence of the DBS code of practice and makes a copy available on request.

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- undertake to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

### **Policy Procedure**

Siamo Group is committed to the immediate investigation of any claims of discrimination on the grounds of a protected characteristic, discrimination, or contrary to the Rehabilitation of Offenders Act. Where found, any discriminatory practice will be ceased forthwith and remedies applied.

Any employee found guilty of discrimination will be instructed to desist forthwith and will be dealt with under Siamo Group's disciplinary procedure. An employee repeating any act of discrimination may be dismissed.

Siamo Group recognises the right of an employee to belong to, or not to belong to, a trade union, and membership or non-membership of such a union will not be taken into account in any way during the career of the employee.

Siamo Group is committed to the employment of disabled people whenever possible and will treat such employees in exactly the same manner as other employees, the difficulties of their disablement permitting. Wherever possible reasonable adjustments will be made to ensure that disabled employees are not disadvantaged, for example, gaining access to the facilities on the company premises, training, and progressing in their career, subject only to opportunity, talent, and experience.

### **Complaints Procedure**

Siamo Group's grievance procedure should be utilised by an employee in the event that they believe they have suffered discrimination.

If the complaint is against the employee's own immediate or other superior, confidential application should be made to Craig Golby, Managing Director, who may authorise immediate reference to the next tier of management if this seems appropriate in the circumstances.

In instances of sexual harassment, as far as possible, the anonymity of the complainant will be protected.

It should not be overlooked that an employee who discriminates or harasses may be liable for payment of damages to the person offended, in addition to any damages payable by the company should it have failed to ensure the practice ceased forthwith. Under the Criminal Justice Act 1994, harassment became a criminal offence punishable by a fine of up to £5,000 and/or a prison term of up to six months.

To make a complaint of discrimination, harassment, victimisation, or unfair treatment it will be necessary, where applicable, to have;

- details of what, when, and where the occurrence took place,
- any witness statements or names,

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- names of any others who have been treated in a similar way,
- details of any former complaint made about the incident, date, and where and to whom it was made,
- a preference for a solution to the incident.

Until a hearing is arranged, complainants should keep the matter confidential, other than arranging for details of witnesses to be given to Craig Golby, Managing Director.