



**Global Procurement Group Limited
Equal Opportunities and Diversity Policy
v2 March 2021**

Version Control

| Date | Ver | Changes | Author(s) |
|-------------|------------|---|-----------------------------------|
| Mar 2021 | - | Introduction of version control page | Kelly Convery |
| Mar 2021 | 2 | Updated Introduction. Updated Company Name. Updated clauses and subclauses so all sections were covered and can be referred to accordingly. Updated clause 3 and included old clause 9 re responsibility of policy. Updated clause 5. Updated clause 6. Updated clause 7. Updated clause 8 to include disabilities. Added new clause 9 – termination of employment. Updated contact information for clause 11. Added clauses 13 & 14. | Kelly Convery and the Legal team. |



1. Introduction

Global Procurement Group Limited and any of its subsidiaries from time to time (“the Company”) is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, colour, nationality, ethnic or national origin, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion, or beliefs, age, or sexual orientation (Protected Characteristics). This policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by the Company. The Company believes that all Employees and clients are entitled to be treated with respect and dignity.

For the purposes of this policy “Employee” refers to all employees, officers, consultants, contractors, casual workers, and agency workers of the Company.

For those Employees who are based outside of the UK, should there be any conflict between this policy and a local law, or any location-specific Equal Opportunities and Diversity Policy put in place by the Company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this policy.

2. Objectives of this policy

- 2.1 To prevent, reduce and stop all forms of unlawful discrimination at work in line with the Equality Act 2010.
- 2.2 To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity.

3. Responsibility for this policy and Designated Officer

- 3.1 The Company’s board of directors has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law.
- 3.2 All Employees, subcontractors and agents of the Company are required to act in a way that does not subject any other Employees or clients to direct or indirect discrimination, harassment, or victimisation on the grounds of their race, colour, nationality, ethnic or national origin, sex, pregnancy, or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation.
- 3.3 The co-operation of all Employees is essential for the success of this policy. Senior Employees are expected to follow this policy and to try to ensure that all Employees, subcontractors, and agents do the same.
- 3.4 Employees may be held independently and individually liable for their discriminatory acts by the Company and in some circumstances an Employment Tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.
- 3.5 Day-to-day operational responsibility for this policy, has been delegated to the Designated Officer, as follows:

Name: Kelly Convery

Position: Global HR Manager

Contact Details: 0191 543 9765 / Kelly.Convery@ngpltd.co.uk



4. Definition of Discrimination

- 4.1 Discrimination is unequal or differential treatment which leads to one person being treated favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, colour, nationality, ethnic or national origin, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. Discrimination may be direct or indirect and includes discrimination by perception and association.

5. Types of Discrimination

- 5.1 Employees must not unlawfully discriminate against or harass other people including current and former Employees, job applicants, clients, customers, suppliers, and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts), and on work-related trips or events including social events.
- 5.2 The following forms of discrimination are prohibited under this policy and are unlawful:
- 5.2.1 **Direct Discrimination:** this occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, colour, nationality, ethnic or national origin, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion, or beliefs, age, or sexual orientation.
- 5.2.2 **Indirect Discrimination:** this is the application of a policy, criterion, or practice which the employer applies to all Employees but which is such that:
- 5.2.2.1 it is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents;
- 5.2.2.2 the employer cannot justify the need for the application of the policy on a neutral basis; and
- 5.2.2.3 the person to whom the employer is applying it suffers detriment from the application of the policy.
- 5.2.3 **Harassment:** this occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment is dealt with further in the Company's Anti-Harassment and Bullying Policy.
- 5.2.4 **Victimisation:** this occurs when a person is treated less favourably because they have brought or intend to bring proceedings, or they have given or intend to give evidence.

6. Unlawful Reasons for Discrimination

- 6.1 **Sex**
- 6.1.1 It is not permissible to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination.
- 6.2 **Age**
- 6.2.1 It is not permissible to treat a person less favourably because of their age. This applies to people of all ages.
- 6.3 **Disability**



6.3.1 It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

6.4 Race

6.4.1 It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality, or their ethnic or national origin.

6.5 Sexual Orientation

6.5.1 It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, heterosexual, or bisexual.

6.6 Religion or Belief

6.6.1 It is not permissible to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief.

7. Positive Action in Recruitment

7.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person with the involvement of the HR team where possible. The Company's recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

7.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

7.3 The Company must take steps to ensure that its vacancies are advertised to a diverse labour market.

7.4 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

7.5 Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Human Resources Department. For example:

7.5.1 questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);

7.5.2 questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment;

7.5.3 positive action to recruit disabled persons; or

7.5.4 equal opportunities monitoring (which will not form part of the selection or decision-making process). Where necessary, job offers can be made conditional on a satisfactory medical check.

7.6 The Company is required by law to ensure that all Employees are entitled to work in the UK. Assumptions about immigration status should not be made based upon appearance or apparent nationality. All prospective Employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration

legislation. The list of acceptable documents is available from UK Visas and Immigration.

- 7.7 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in the organisation, the Company monitors applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

8. Disabilities and Reasonable Adjustments

- 8.1 If an Employee is disabled or becomes disabled, they are encouraged to tell the Company about their condition so that it can provide support as appropriate.
- 8.2 The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:
- 8.2.1 Making adjustments to premises;
 - 8.2.2 Re-allocating some or all of a disabled Employee's duties;
 - 8.2.3 Transferring a disabled Employee to a role better suited to their disability;
 - 8.2.4 Relocating a disabled Employee to a more suitable office;
 - 8.2.5 Giving a disabled Employee time off work for medical treatment or rehabilitation;
 - 8.2.6 Providing training or mentoring for a disabled Employee;
 - 8.2.7 Supplying or modifying equipment, instruction, and training manuals for disabled Employees; or
 - 8.2.8 Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.
- 8.3 If an Employee experiences difficulty at work because of a disability, they may contact the Designated Officer to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The Designated Officer may wish to consult with the Employee about possible adjustments. The Company will consider the matter carefully and try to accommodate any needs within reason. If the Company considers a particular adjustment would not be reasonable it will explain its reasons and try to find an alternative solution where possible.
- 8.4 The Company will monitor the physical features of its premises to consider whether they might place anyone with a disability at a substantial disadvantage. Where necessary, the Company will take reasonable steps to improve access.

9. Termination of employment

- 9.1 The Company will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 9.2 The Company will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal, or other disciplinary action.



10. Acting on Discriminatory Behaviour

10.1 In the event that an Employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the Disciplinary, and Grievance policies and procedures.

11. Advice and Support on Discrimination

11.1 Employees may contact their employee or trade union representative if access to such an individual is possible.

11.2 Other contacts may include:

Equality and Human Rights Commission

Manchester

Correspondence Unit
Arndale House
The Arndale Centre
Manchester
M4 3AQ
Telephone: 0161 829 8100

London

Fleetbank House
2-6 Salisbury Square
London
EC4Y 8JX
Telephone: 020 7832 7800

Cardiff

Block 1
Spur D
Government Buildings
St Agnes Rd
Gabalfa
Cardiff
CF14 4YJ
Telephone: 02920 447710
Email: wales@equalityhumanrights.com

Glasgow

151 West George Street
Glasgow
G2 2JJ



Telephone: 0141 228 5910

Email: scotland@equalityhumanrights.com

Website: www.equalityhumanrights.com

Citizens Advice Bureau

The Davidson Building, Swan Street

Gateshead

Tyne & Wear

NE8 1BG

Telephone: 0344 245 1288

Website: www.citizensadvice.org.uk

Community Legal Services Direct

Telephone: 0845 345 4 345

Website: www.clsdirect.org.uk

12. The Extent of the policy

12.1 The Company seeks to apply this policy in the recruitment, selection, training, appraisal, development, and promotion of all Employees. The Company offers goods and services in a fashion that complies with the spirit of this policy.

12.2 This policy does not form a part of any employment contract with any Employee and its contents are not to be regarded by any person as implied, collateral, or express terms to any contract made with the Company.

13. Review of policy

The Company reserves the right to review and amend this policy from time to time.

14. Breach of this policy

The Company takes a strict approach to breaches of this policy, which will be dealt with in accordance with the Company's Disciplinary Policy and Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If an Employee believes that they have suffered discrimination, they can raise the matter through the Company's Grievance Procedure or through the Company's Anti-Harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against Employees who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Company's Disciplinary Policy and Procedure.

This policy and procedure has been approved and authorised by:

Name: Scott High

Position: People Director

Signature: