



EQUALITY AND DIVERSITY POLICY

GEOFFREY OSBORNE LIMITED, SUBSIDIARY COMPANIES AND DIVISIONS

OVERVIEW

1. Osborne is committed to recognising and encouraging diversity amongst the workforce. Any form of unfair discrimination, victimisation or harassment on the grounds of an individual's gender, race, disability, sexual orientation, religion or belief, marital status, age or any other personal characteristic is unacceptable and will not be tolerated in the workplace.
2. **Equality** is about ensuring that everyone (customers, clients, job applicants and employees) is treated fairly and equally.
3. We recognise that treating people equally does not mean treating everyone the same, and as such sometimes it will be necessary to treat some people differently in order for them to experience equal treatment.
4. **Diversity** is about recognising that people are individuals and therefore differ from each other in a variety of ways.
5. Osborne is committed to ensuring that we value the diversity of our customers, clients, job applicants and employees and as such, view diversity positively and as something to be harnessed for the benefit of the company.
6. We believe that harnessing differences will lead to a more productive working environment in which everyone feels valued, employee's talents are fully utilised, customer needs are satisfied and our business goals are met.
7. **Discrimination** occurs when a person is treated less favourably than another person who is in the same or similar position, and the reason for this treatment is not justifiable.

Discrimination can occur in 4 main ways:

- a. **Direct Discrimination** - Direct discrimination will occur where in like for like circumstances, a person is treated, or would have been treated, less favorably than others on the grounds of race, gender, sexual orientation, religion or belief, age or personal characteristics.
- b. **Indirect Discrimination** - Indirect discrimination occurs when an employer applies a provision, criterion or practice to everyone that puts, or would put, a group of people at a particular disadvantage compared to others. This definition covers formal requirements, conditions and provisions, as well

as informal practices. An example of indirect discrimination would be a requirement for all staff to be clean-shaven. In this example, the same requirement is applied equally to all staff, but it would particularly disadvantage those of a particular faith.

c. **Victimisation** - Victimisation will occur where a person is treated less favorably because they carried out a 'protected act', e.g. has alleged that discrimination or harassment has taken place; has presented a claim to an employment tribunal; or has acted as a witness in a discrimination or harassment case.

d. **Harassment**– Unwanted conduct which has the purpose or the effect of violating a person's dignity or which creates an environment that is demeaning, degrading, threatening or hostile.

8. **Bullying** - Offensive, intimidating, malicious or insulting behaviour, that involves an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure recipients.

9. Harassment and bullying may therefore include unwanted remarks, inappropriate jokes or ridicule, unwelcome physical contact, suggestions or demands for sexual favors, racial shunning or segregation.

10. **Genuine Occupational Requirement (GOR)** - In very limited circumstances it will be lawful for an employer to treat people differently if it is a GOR. Where there is a genuine requirement for a particular type of person to do the job, the employee must be able to justify a sound business reason for this. This may occur if it is necessary that, for example, an individual of a particular religion be required to do a job.

KEY PRINCIPLES

11. Osborne's Equality and Diversity Policy principles apply to all employees, job applicants, customers and is supported by a range of complimentary policy documents that direct and guide our work.

12. Osborne will look to draw its workforce from all elements of society to ensure they attract and retain the best staff. Osborne will aim to ensure that employees are recruited, selected and promoted on the basis of their relevant qualifications, skills and abilities.

13. Osborne aims to create a working environment free from unlawful discrimination, victimisation or harassment.

14. Osborne aims to treat all staff fairly in respect of training and development opportunities and will encourage them to reach their full potential and increase their contribution to an effective service delivery. All requests will be considered on the basis of the need and relevance to the job being undertaken by the employee.

RESPONSIBILITY

15. All Osborne employees have an individual responsibility for ensuring equality of opportunity and adherence to this policy by respecting the right to work in an

environment free from prejudice and discrimination, by behaving in a considerate and sensitive manner and by challenging colleagues who fall short of these expectations.

16. All employees are required to ensure that they treat all people that they come into contact with during the course of their work fairly, equally and with respect.

17. The HR Policy & Projects Manager will be the lead role for all Equality & Diversity issues within Osborne and for the review and administration of the policy.

COMMUNICATION

18. The Equality and Diversity Policy will be communicated to all employees within Osborne with updates issued as and when required. The policy will be included on the intranet, in Osborne's employee handbook and be part of the group induction process.

19. The Equality and Diversity Policy will be included on Osborne's website to enable access for all clients, contractors and other interested parties.

TRAINING

20. Training on equality and diversity issues is an essential part of the implementation of the policy. It is mandatory for all employees with line management responsibility and those who regularly deal with general public to attend the Equality and Diversity Awareness Training.

21. Equality & Diversity training for all employees will be built into the Group Induction day and into company Road shows.

22. Refresher Equality and Diversity training will be given as and when necessary to reflect changes in legislation and social expectations.

MONITORING

23. Regular monitoring will be undertaken in respect of gender, age, race/ethnicity and disability in relation to recruitment, retention, training and development, complaints, appeals and harassment cases in order to help identify and address any less favourable treatment and/or inequality.

24. The HR Policy and Projects Manager will review the diversity statistics on a quarterly basis and submit a report to the Executive Committee.