

# EQUAL OPPORTUNITIES POLICY

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## PURPOSE

It is Nylacast's policy to provide equal opportunities in all aspects of employment and to ensure that all employees are treated without discrimination irrespective of sex, race, religion, national or ethnic origin, disability, marital status, or age.

## SCOPE

This policy is applicable to all personnel, encompassing employees, workers, agency workers, contractors, and prospective job applicants. Every individual within our organisation, including employees, workers, agency workers, and contractors, has the responsibility of refraining from discrimination and refraining from assisting others in discriminatory actions. This policy applies to all employees at all levels and grades within Nylacast, no matter where they are location (within or outside the UK).

It is imperative that you treat all our visitors, customers, and suppliers without discrimination. Likewise, we anticipate that our visitors, customers, and suppliers will reciprocate this principle by not discriminating against you. Any visitor, customer, or supplier found to engage in discriminatory behaviour will face appropriate action.

## REFERENCE DOCUMENTS

- Anti-Bullying and Harassment Policy
- Data Protection Policy
- Disciplinary Policy
- Grievance Policy
- Human Rights Policy

## RESPONSIBILITY

The Equal Opportunities Policy applies to all Nylacast employees, workers, agency workers, and external stakeholders of contractors, visitors, and suppliers.

## POLICY

Nylacast's Equal Opportunities Policy seeks to address discrimination in the workplace.

## DIRECT DISCRIMINATION

Direct discrimination occurs when an individual is subjected to unfavourable treatment in comparison to others due to a protected characteristic.

For example, it constitutes discrimination if a manager excludes an employee from a training course solely because of their disability. Direct discrimination also encompasses situations where someone faces adverse treatment because they are associated with an individual possessing a protected characteristic or if they are perceived to have a protected characteristic themselves.

## **INDIRECT DISCRIMINATION**

Indirect discrimination transpires when a seemingly impartial practice or requirement places a disproportionate burden on a specific group and cannot be justified by legitimate business needs.

For example, requiring all employees to work long hours without considering flexible work arrangements may disproportionately disadvantage parents with young children. This practice would be considered unlawful unless it can be justified by legitimate business reasons.

## **FAVOURITISM**

It is also discrimination if; a manager consistently gives promotions, raises, and desirable assignments to employees who are members of the same social club they belong to, while neglecting or denying similar opportunities to other equally or more qualified employees who are not part of that club. This would be considered favouritism and could be a form of discrimination if it cannot be justified by legitimate business reasons.

## **RECRUITMENT AND SELECTION**

We aim to ensure that job requirements and selection criteria are clear, objective, and focused on effective job performance. Stereotypical assumptions based on protected characteristics will be avoided when assessing who can perform a specific job. Recruitment, selection, training, and promotion will be based on objective criteria like ability and competence, aligning with job requirements. We actively encourage all employees to seize training opportunities.

Our commitment extends to ensuring that no job applicant faces unfair disadvantages stemming from practices or requirements that disproportionately affect protected groups and lack justification in terms of job demands.

Every job will have a clearly defined job description and person specification, highlighting the necessary skills, experience, and qualifications. If a job allows for flexibility, this will be specified in the job description. During interviews, we aim to involve multiple interviewers to mitigate unintentional bias. We will refrain from seeking personal or irrelevant information during interviews and solely evaluate applicants based on their relevant skills, qualities, and experience for the job.

## **PROMOTION, TRAINING AND APPRAISALS**

Promotion and training decisions will be made based on merit and performance. We believe all employees should have an equal opportunity to progress and develop. All employees will be encouraged to take advantage of training and development opportunities.

Training and development needs will be identified through regular reviews/training needs analysis/appraisal discussions.

## **WORKING CONDITIONS AND TERMS OF EMPLOYMENT**

Nylacast believes that all employees have a right to be treated with dignity and as such will not tolerate any form of harassment. Any employee found to have harassed a fellow employee would be subject to disciplinary action, which may result in summary dismissal.

Nylacast will make reasonable efforts to accommodate cultural or religious practices, such as prayer requirements. For items that need to be kept separate, we can arrange separate fridge shelves. Our goal is to maintain employment terms, benefits, facilities, and policies that are devoid of any unlawful discrimination. We will conduct regular reviews of our benefits and facilities to guarantee that they remain accessible to all eligible employees, free from any unlawful barriers.

Nylacast will ensure that decisions made under our disciplinary, grievance, performance management / improvement and attendance management policies are carried out fairly and without discrimination.

## **TERMINATION OF EMPLOYMENT**

We are committed to preventing discrimination in our decisions regarding dismissal or redundancy. Additionally, departing employees are asked to provide feedback on their employment experience during exit interviews.

## **DISABLED EMPLOYEES**

We make adjustments to accommodate disabled employees where possible and reasonable for example, we can provide extra equipment or support along with some of our sites containing wheelchair entrances and passenger lifts. If you think you may have a disability, you are encouraged to tell the business about this so that we can explore what adjustments might be appropriate.

## **COMPLIANCE**

An employee who believes that he or she has not been treated on an equal basis contrary to this policy may raise the matter as per Nylacast's Grievance Policy.

The Employer believes that all employees have a right to be treated with dignity and as such will not tolerate any form of harassment. Any employee found to have harassed a fellow employee would be subject to disciplinary action, which may result in summary dismissal.

## **TRAINING, AWARENESS AND COMMUNICATION**

The HR Manager will be responsible for bringing this policy to the attention of all employees and should be approached if an employee requires guidance on any item including in this policy.

## REPORTING AND MONITORING

An employee who believes that he or she has not been treated on an equal basis contrary to this policy may raise the matter via the Employer's grievance procedure.

## WHAT TO DO IF YOU HAVE BEEN DISCRIMINATED AGAINST

If you suspect that you have encountered discrimination, we encourage you to communicate your concerns. You have the option to have an informal discussion with your manager or the HR Manager. For those seeking a more formal approach, we recommend raising the issue through our grievance procedure.

In the event of perceived bullying or harassment, it is advised to report the matter through our dedicated bullying and harassment procedure.

You can access all our policies and procedures through the HR Department.

We take allegations of potential policy breaches seriously. Individuals who make such claims in good faith will not face retaliation or unfavourable treatment. However, any false allegations made in bad faith will be addressed according to our disciplinary procedure.

## WHAT WILL HAPPEN IF YOU ACT IN A DISCRIMINATORY WAY

If, after investigation, we decide that you have acted in breach of this policy, you may be subject to disciplinary action up to and including dismissal. This applies to the most senior levels of management as well as to all other employees.

## DATA PROTECTION

For information about our processing of personal data under this policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our Data Protection Policy.

## REVIEW AND REVISION

The HR Manager will be responsible for updating this policy on a regular basis.

## CHANGE HISTORY

Date	Rev. No.	Revision by	Description of change
10/01/17	01	Ian Mallabone	First issue of the Policy
13/05/19	02	Ian Mallabone	Addition of Data Protection
21/04/20	03	Ian Mallabone	Nylacast Ltd changed to Nylacast
05/07/21	04	Ian Mallabone	Policy formatting updated