

## Equality, Diversity & Inclusion Policy

### 1. Purpose

Prime Atlantic Group is committed to promoting and encouraging equality, diversity, and inclusion among our workforce. Our aim is for our workforce to be truly representative of all sections of society and for all employees to feel respected, supported, and able to perform to their full potential.

We are committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals can make the best use of their skills, free from discrimination, harassment, or victimisation, and in which all employment decisions are based solely on merit, ability, and business needs.

We do not discriminate against staff on the basis of any protected characteristic defined under the Equality Act 2010, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or any other characteristic protected by UK law. This policy is implemented in accordance with the Equality Act 2010 and relevant UK legislation.

### 2. Scope

This policy covers all PAG employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers, and former staff members.

All staff have a duty to act in accordance with this policy and to treat colleagues with dignity and respect at all times. Discrimination, harassment, or bullying will not be tolerated under any circumstances. Further guidance can be found in our Anti-Harassment and Bullying Policy.

Managers will, where appropriate, receive training on equal opportunities awareness and recruitment best practice.

If you have any questions about the content or application of this policy, you should contact your line manager or the HR Department for advice, training, or further information.

This policy applies to all aspects of the employment relationship, including recruitment and selection, training and development, opportunities for promotion, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

This policy operates in accordance with the Equality Act 2010 and all related UK legislation, including but not limited to:

- The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017
- Guidance from the Equality and Human Rights Commission (EHRC)
- Other relevant employment and anti-discrimination legislation

Prime Atlantic Group ensures that all practices, procedures and decisions comply with these legal requirements, reinforcing our commitment to equality, diversity and inclusion across the organisation.

### 3. Associated Documentation

PAG\_HR\_PCY\_015 Anti-Harassment and Bullying Policy

PAG\_HR\_PCY\_003 Disciplinary Policy

## Equality, Diversity & Inclusion Policy

PAG\_HR\_PRO\_016 Disciplinary Procedure

PAG\_HR\_PRO\_018 Grievance Procedure

### 4. Definitions

Equality – Ensuring everyone has equal access to opportunities and is treated fairly.

Diversity – Recognising and valuing individual differences.

Inclusion – Creating a culture where everyone feels respected, supported and able to contribute fully.

Protected characteristics under the Equality Act 2010 include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

### 5. Policy Statement and Implementation

We will take appropriate steps to accommodate the requirements of different religions, cultures and domestic responsibilities.

Discrimination by or against an employee is prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

Disability discrimination can include both direct and indirect discrimination and is any unjustified less favourable treatment because of the effects of a disability and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

## Equality, Diversity & Inclusion Policy

Job advertisements should avoid stereotyping or using wording that may discourage groups from applying. They should include an appropriate short policy statement on equal opportunities, and a copy of this policy shall be sent on request to those who enquire about vacancies.

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, use may be made of lawful exemptions to recruit suitably qualified people to cater for the special needs of particular groups.

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 Human Resources approval. For example:

- (a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- (b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- (c) Positive action to recruit disabled persons.
- (d) Equal opportunities monitoring (which will not form part of the decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective staff, 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 the UK Border Agency.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor 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.

Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

## Equality, Diversity & Inclusion Policy

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal, or other disciplinary action.

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your manager may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

We monitor our use of fixed-term employees, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment, you are encouraged to raise the matter through our Anti-harassment and Bullying Policy. If you are uncertain which applies or need advice on how to proceed you should speak to your manager.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

### 6. Responsibilities

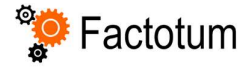
Directors and Senior Management: Ensure policy implementation and compliance across all operations.

Line Managers: Promote inclusive behaviours, ensure fair decision-making and address any breaches.

All Staff: Treat others with respect and report any suspected discrimination or harassment.

HR Department: Monitor compliance, advise on implementation and support investigations.

### 7. Review



## Equality, Diversity & Inclusion Policy

This policy will be reviewed annually to ensure its continuing suitability and alignment with the Prime Atlantic Group's strategic direction, Mission, Vision, and Values. If no changes are required during the review, the policy will be confirmed and remain as the current version.