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Introduction and Purpose

UMi is committed to eliminating discrimination and supporting a culture of equality, diversity and inclusion, whether it be in the way we work with our employees or when we engage with stakeholders, customers and suppliers. We oppose all forms of unlawful and unfair discrimination and believe that all individuals should be treated fairly and have access to equal opportunities.

We also look for a culture of diversity and inclusion within in our subcontactors and supply chains.

Scope

This Policy applies to the Board, employees, associates and sub contractors.

We recognise that our talented, committed workforce is the driving force behind what makes UMi unique and we aim to ensure that each employee feels involved, respected, able to give of their best and connected to our success. Through our Service Standards we also empower our workforce to treat each other, as well as all those they come into contact with, in a fair, dignified and respectful manner.

We would expect all parties acting on behalf of UMi to comply with this Policy.

This Policy will be implemented within:

- all employment policies and procedures including recruitment and selection, training and development, and terms and conditions of service; and
- all dealings with employees, job applicants, contractors, suppliers, business partners, customers and the general public.

Guiding Principles

UMi will be an organisation:

- which promotes equality and ensures equal opportunity and access for all groups of people;
- where employees feel involved, respected and connected to our success, and individual differences and the contributions of all our staff are recognised and valued;
- where every employee is entitled to a working environment that promotes dignity and respect to all, and that no form of intimidation, victimisation, discrimination or harassment will be tolerated;



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- with a focus on talent and ability, ensuring that development and progression is available to all employees; and
- where all employees are aware of their responsibility for promoting equality, diversity and inclusion in their work.

Authority, Responsibility and Decision Making

The Chief Executive has overall responsibility for ensuring UMi's compliance with the Policy and reporting to the Board of UMi Holding Limited, the parent company, and for implementing and reviewing the Policy and for developing strategies to ensure continual improvement.

All managers have the responsibility of ensuring the implementation of the Policy in the area for which they have operational responsibility. They must ensure that the Policy is fairly and consistently applied, that employees under their control are aware of their obligations and that the Policy is complied with.

All employees, associates and subcontractors are responsible for cooperating with and adopting the requirements of the Policy, ensuring that they do not discriminate against fellow employees, customers, suppliers or members of the public with whom they come into contact during the course of their duties. They are responsible for reporting any discriminatory act known to them to their manager or UMi representative.

Processes and Procedures

Recruitment and Selection

UMi is an equal opportunity employer. We aim to ensure that no job applicant or employee receives less favourable treatment on the grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion, age or any other form of stereotyping; nor should they be disadvantaged by conditions or requirements which are neither justified nor relevant to the job.

The recruitment procedure will be based on objective criteria identified in the job description and competency framework requirements.

Selection criteria and HR procedures will be reviewed regularly to ensure that individuals are recruited, promoted and treated in all other ways purely on the basis of merit and ability to do the job for which they have applied. Interview questions will be based on the job description and competency framework requirements. All interviewers must have read and understood this Policy. All candidates should be questioned in a similar way in each designated area, although it is accepted that it is more important to gain relevant information than to adhere to set questions and this may require supplementary questions being asked.



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Learning and Development

UMi is committed to ensuring equality of opportunity in terms of access to training in order to increase employees' knowledge and skills and to provide opportunities to develop their potential.

Ongoing Employment

UMi is committed to assisting any employee who, as a result of an illness or accident, becomes disabled, by making suitable provision, as far as is reasonably practicable, to assist that individual to maintain their employment and career opportunities.

Benefits, Rewards and Contractual Terms

UMi is committed to ensuring that no employee receives less favourable treatment in terms of benefits received on the grounds of sex, marital status, age, disability, race, religious belief or political opinion nor should they be disadvantaged by conditions or requirements which are neither justified nor relevant to provision of the benefit.

It is recognised, however, that terms and conditions of employment across the business may vary for reasons unrelated to a reason of discrimination, and in such instances those contractual terms will prevail.

Service Standards

Our Service Standards will become embedded within the culture of the business and will provide all employees with the understanding and resources to deliver exceptional service to each other as well as stakeholders, customers and suppliers. This includes compliance with this Policy in all interactions.

Right to Withdraw Services

UMi reserves the right to withdraw services/support to clients or individuals that demonstrate persistent discriminatory behaviour.

Compliance

The Policy covers areas of both direct and indirect discrimination.

- **Direct Discrimination** is the less favourable treatment of one person than another.
- Indirect Discrimination is the creation of an unjustified condition or term of employment which prevents people from certain groups from receiving equal consideration.

The Policy complies with the Equality Act 2010 and the Equality and Human Rights Commission Equality Act Codes of Practice. This includes a commitment to pay all staff the government living wage as a minimum.



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Sanctions of Non-compliance

We are committed to ensuring that every employee has a positive and pleasant working environment, and will not tolerate any type of harassment for whatever reason. This Policy should be read in conjunction with the Dignity at Work Policy

We are also committed to ensuring that all those we engage with, including stakeholders, customers and suppliers, are treated with fairness, dignity and respect.

Any employee who believes that they have been discriminated against on any grounds detailed in this Policy should take action through UMi's Grievance Procedure.

Any employee who is found to have discriminated directly or indirectly against any other employee or client will be subject to disciplinary action under UMi's Disciplinary Procedure which, for serious offences, may result in dismissal.

Any member of the public who wishes to make a complaint can do so by following the 'Customer Service Query' instructions on our website.

Review

The Policy shall be reviewed in line with overall business policy review, and shall take into account changes in relevant UK Legislation and Regulations. It will also be reviewed as part of any investigations into complaints or suggestions for improvement if appropriate.

Nicki Clark

Chief Executive

Last reviewed: 27 June 2019