

EQUAL OPPORTUNITIES, BULLYING AND HARASSMENT POLICY

1. Introduction

- 1.1. nZero Group and its subsidiaries recognise that it is essential to provide equal opportunities to all persons without discrimination. This policy sets out the company's position on equal opportunity in all aspects of employment, including recruitment and promotion, giving guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, disability, part-time and fixed term contract status, age, sexual orientation or religion. Any suspected wrongdoing should be reported as soon as possible.
- 1.2. This policy covers all nZero Group employees, officers, consultants, contractors, [volunteers,] [interns,] casual workers and agency workers.
- 1.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Principle Guidance, Legislation

- Employment Bill 2022
- EHRC Sexual harassment and harassment at work technical guidance 2020

3. Responsibility

As an employee of the nZero Group, you have a duty of co-operation to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Employees should draw to the attention of their line manager any suspected discriminatory acts or practices or suspected cases of harassment without fear of reprisals, see Whistleblowing Policy.

4. Statement of Policy

It is the policy of nZero Group to ensure that no job applicant or employee receives less favourable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed-term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable. The company is committed not only to its legal obligations but also to the positive promotion of equality of opportunity in all aspects of employment.

The company recognises that adhering to the Equal Opportunities Policy, combined with relevant employment policies and practices, maximises the effective use of individuals in both the company's and employees' best interests. nZero recognises the great benefits in having a diverse workforce with different backgrounds, solely employed on ability.

The application of recruitment, training, and promotion policies to all individuals will be on the basis of job requirements and the individual's ability and merits.

All employees of the company will be made aware of the provisions of this policy.

4.1. Equal Opportunities

nZero Group is an equal opportunity employer and are fully committed to a policy of treating all of our employees and job applicants equally in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

nZero Group will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications, without regard to race, religion or belief, sex, sexual orientation, pregnancy or maternity, gender reassignment, age, marriage and civil partnership or disability. In this Policy these are known as the "Protected Characteristics".

nZero Group will appoint, train, develop and promote on the basis of merit and ability alone. Take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon any of the Protected Characteristics. nZero will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with us, such as clients, customers, contractors and suppliers.

Action will be taken under our Disciplinary Procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal.

Employees must not harass, bully or intimidate other employees for reasons related to one or more of the Protected Characteristics. Such behaviour will be treated as potential gross misconduct under our Disciplinary Procedure. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

4.2. Discrimination

You 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 or when wearing a work uniform), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination – when someone is treated less favourably than another person because of a Protected Characteristic.
- Associative discrimination or discrimination by association – direct discrimination against someone because they associate with another person who possesses a Protected Characteristic.
- Discrimination by perception – direct discrimination against someone because it is thought that they possess a particular Protected Characteristic even if they do not actually possess it.
- Indirect discrimination - occurs where an individual's employment is subject to an unjustified provision criterion or practice which e.g. one sex or race or nationality or age group finds more difficult to meet, although on the face of it the provision, criterion or practice is 'neutral'.
- Harassment – unwanted conduct related to a relevant Protected Characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. You may complain of such offensive behaviour even if it is not directed towards you personally.
- Victimisation – when an employee is treated less favourably because they have made or supported a complaint or raised a grievance about unlawful discrimination or are suspected of doing so.

- Disability discrimination: this includes direct and indirect discrimination, any unjustified unfavourable treatment because of something arising in consequence of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

4.3. Recruitment and Promotion

Advertisements for posts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the post. Information about vacant posts will be provided in such a manner that does not restrict its audience in terms of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.

Recruitment literature will not imply a preference for one group of applicants unless there is a genuine occupational qualification which limits the post to this particular group, in which case this must be clearly stated.

All vacancies will be circulated internally where possible. Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular Protected Characteristic. All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.

All selection will be thorough, conducted against defined criteria and will deal only with the applicant's suitability for the job. Where it is necessary to ask questions relating to personal circumstances, these will be related purely to job requirements and asked to all candidates.

With disabled job applicants, we will have regard to our duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

4.4. Employment

nZero Group will not discriminate on the basis of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion in the allocation of duties between employees employed at any level with comparable job descriptions.

nZero Group will put in place any reasonable measures and/or adjustments within the workplace for those employees who become disabled during employment or for disabled appointees.

All employees will be considered solely on their merits for career development and promotion with equal opportunities for all. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, we will implement them. We will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

4.5. Training

Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.

All employees will be encouraged to discuss their career prospects and training needs with their Line Manager or the HR Department.

4.6. Bullying and Harassment

nZero Group is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. This includes harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions.

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Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to a Protected Characteristic. Harassment is unacceptable even if it does not fall within any of these categories. Harassment may include (this is a non-exhaustive list), for example:

- (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing.
- (b) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless).
- (c) offensive e-mails, text messages or social media content.
- (d) mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include (this is a non-exhaustive list), by way of example:

- (a) physical or psychological threats.
- (b) overbearing and intimidating levels of supervision.
- (c) inappropriate derogatory remarks about someone's performance.

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

4.7. Grievances and Victimisation

nZero Group emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the company's Disciplinary Procedure.

Any complaints of discrimination will be pursued through the company's Grievance Procedure.

5. Records

nZero Group shall maintain a documented record of any related meetings, interviews and investigations.