# TIBBETTS
# EQUAL OPPORTUNITIES POLICY

The Tibbetts Group encompassing the divisions of TGL, BFC and PG source, test, supply, repackage and assemble batch traced engineered components to Automotive, Aerospace and Industrial sectors and are dedicated to product quality and customer satisfaction.

## Policy Statement

Tibbetts is committed to promoting equal opportunities in employment. Employees and job applicants alike will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (i.e., protected characteristics).

The purpose of this policy is to set out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

This policy does not form part of any contract of employment or other contract to provide services. We may amend it at any time.

## Scope

This policy applies to all employees (full time, part-time and fixed term), consultants, contractors, volunteers, interns, casual workers and agency workers.

## Responsibilities

The Group People & Culture Manager has overall responsibility for the effective operation of this policy, who will review it as appropriate in line with UK Employment Law.

The Group People & Culture Manager has day-to-day responsibility for this policy, and you should refer any questions and suggestions for change about this policy to them in the first instance.

All managers must set an appropriate standard of behaviour, lead by example and ensure that the individuals that they manage adhere to the policy and promote our aims and objectives with regards to equal opportunities. Managers will be given appropriate training on equal opportunities awareness, as well as equal opportunities recruitment and selection best practice. The People & Culture Manager has overall responsibility for equal opportunities training.

## 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 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**: treating someone less favourably because of a ‘protected characteristic’. For example, rejecting a job applicant because of their religious beliefs or because they might be gay.
- **Indirect discrimination**: a provision, criterion or practice that applies to everyone but adversely affects people with a particular 'protected characteristic’ more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than

men. Such a requirement would be discriminatory unless it can be business justified.

- **Harassment:** this includes sexual harassment and other unwanted conduct related to a 'protected characteristic', which 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 'Harassment and Bullying Policy – PC08'.
- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- **Disability discrimination**: this includes direct and indirect discrimination, 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.

## Recruitment and Selection

Recruitment, promotion, and other selection exercises, such as redundancy selection, will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person and with the involvement of the People & Culture Department, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. This Equal Opportunities Policy will be available on request.

Whilst we take steps to ensure that our vacancies are advertised to a diverse labour market, where appropriate and in exceptional circumstances only, the People & Culture Department may approve the use of a lawful occupational requirement under the Equality Act 2010 (Schedule 9), where possessing a particular protected characteristic is a genuine and proportionate requirement for the role, due to its nature or context (for example, a requirement relating to sex). In such cases, the vacancy advertisement will clearly state the applicable exemption and the reason it applies.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a 'protected characteristic'. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions to this which should only be used with the approval of the People & Culture Department. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments)
- Questions to establish if an applicant is fit to attend an assessment, or any reasonable adjustments that may be needed at interview or assessment
- Positive action to recruit individuals with a protected characteristic
- Equal opportunities monitoring (which will not form part of the selection or decision-making process)

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

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 employees, 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 People & Culture Department or UK Visas and Immigration.

## Training, pay, promotion and conditions of service

Training needs will be identified through regular appraisals (WPR's). You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Your salary will be reviewed annually, entirely at the Company's discretion, and there is no obligation to award an increase. We are, however, committed to ensuring no employees are paid below the National Minimum and Living Wage, as detailed under UK employment law.

Resourcing needs and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

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

## Termination of employment

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

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

## Disabilities

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 are encouraged to contact your Line Manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your Line Manager may wish to consult with you and a medical professional (such as your Doctor or Occupational Health) 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 might place anyone with a disability at a substantial disadvantage. Where necessary, we will take reasonable steps to improve access.

## Part-time and fixed-term employment

Part-time and fixed-term employees will be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

## Breaches of this policy

Any breaches of this policy will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct, resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure, found in the Employee Handbook, or through our Harassment and Bullying Policy (PC08) as appropriate. Complaints will be treated in confidence and investigated as appropriate.

There must be no victimisation or retaliation against employees who complain in good faith about discrimination. However, making a false allegation deliberately and in bad faith and with malicious intent will be treated as misconduct and dealt with under our Disciplinary Procedure.

The Group People & Culture Manager will review this policy and monitor its effectiveness on a regular basis in consultation with the Management Team.