EQUALITY, DIVERSITY & INCLUSION POLICY

Policy Statement

Carmichael[UK] is committed to supporting the principle of equal opportunities and opposes all forms of unlawful or unfair discrimination on the grounds of any Protected Characteristic (PC) including sex, race (including colour, nationality, ethnic or national origin), religion or belief, age, disability, marital status and civil partnership, sexual orientation, gender reassignment, and pregnancy and maternity. We also oppose discrimination based on other characteristics that are not protected (e.g., class, obesity, regional accent, etc.).

This policy covers vacancy advertising, recruitment and selection, training, promotion, and conditions of service and is compliant with current relevant legislation including the Equality Act 2010. This policy will be regularly reviewed to ensure continued compliance, although is not intended as a complete statement of the law. This policy also covers equality and diversity in the case of disability and will be used in conjunction with the relevant statutes in force at the time.

The aim of Carmichael[UK] is to create an environment that encourages and values diversity within its workforce and builds on the differences individuals bring, enabling our continued success. We aim to draw upon the widest possible range of views and experiences to meet the changing needs of our staff, clients, partners, contractors, and temporary workers.

We seek to promote diversity and to respond to the needs of all individuals in a fair and equitable manner, whilst observing our commitment and responsibility to current legislation.

To achieve the aims of this policy Carmichael[UK] will:

- Fulfil its social responsibility towards its candidates, employees, contractors, temporary workers, and the communities in which it operates.
- Recognise all its legal obligations.
- Make all opportunities (including advertising, interview and selection processes, promotion, and training) as accessible as possible to under-represented groups.
- Endeavour to attain a workforce that is representative of the communities from which it is drawn to secure the widest pool of diverse talent.
- Recruit, train and promote the best person for the job to make full use of the talents and resources of all our employees.
- Create a working environment free from unlawful discrimination, victimisation, and harassment in which all employees are treated with dignity and respect.
- Periodically review its selection criteria and procedures to ensure that they remain compliant and maintain a system that ensures fairness.
- Distribute and continuously publicise this policy throughout Carmichael[UK], to employees, contractors, temporary workers, clients, partners, visitors to Carmichael[UK], in advertising, and elsewhere as appropriate.

- Provide the facilities and opportunity for any employee who believes that they have been treated inequitably within the scope of this policy to raise the matter through the appropriate grievance or complaints procedure.
- Log all reported instances of harassment and take action to mitigate and minimise harassment and victimisation wherever possible.
- Ensure that employees understand that breaches of this policy will not be tolerated and could lead to disciplinary proceedings.

Scope of the Policy

This policy applies to recruitment, terms and conditions of employment, training, career development, promotion, grievance and disciplinary procedures and all other aspects of employment. All employees are required to comply with this policy when dealing with other employees, consultants, temporary workers, job applicants, clients, suppliers, customers, and contacts of Carmichael^{UK}, and anyone else with whom they come into contact during the course of their employment. To support best practice, contractors and temporary workers who are not employees of Carmichael^{UK} are also expected to abide by this policy while they are working on assignment through Carmichael^{UK}. Where practicably possible, Carmichael^{UK} will protect contractors and temporary workers from discrimination and harassment whilst on assignment with clients of Carmichael^{UK}.

Policy Elements

Discrimination

Carmichael^{UK} will regard the following as discrimination:

- The less favourable treatment of a candidate or employee because of a PC. This applies even if the individual concerned does not actually possess that PC but is discriminated against through association with someone who has the PC.
- The imposition of an unjustified requirement or condition which is such that fewer individuals with any PC can comply, and which is to their detriment.
- The less favourable treatment of a person who has threatened proceedings, given evidence or information, taken any action or made any allegation of discrimination.
- The use of threatening, abusive or insulting language or behaviour with intent to cause another employee, prospective employee or visitor harassment, alarm, or distress.
- The display of any writing, sign or other visible representation which is threatening, abusive or insulting to another employee, prospective employee, or visitor, so that that person feels harassment, alarm, or distress.

Carmichael^{UK} will not discriminate unlawfully when advertising, recruiting, training, promoting, or selecting candidates for submission to a vacancy or assignment or in any terms and conditions for contractors and temporary workers.

EQUALITY, DIVERSITY & INCLUSION POLICY

In line with legislation, CarmichaelUK recognises the following forms:

Direct Discrimination

Where a person is treated less favourably than another because they have a PC, or they are perceived to have a PC or are associated with someone who has a PC. This type of discrimination applies to all PCs.

We will not discriminate against a person because of any PC, either:

- By refusing or omitting to provide any of our services.

Or

- In the way we provide any of our services.

Or

- In the course of undertaking their job.

CarmichaelUK will not accept or act upon an instruction from a client stating that certain persons are unacceptable because of any PC unless that PC prevents them from carrying out a function that is intrinsic to the work concerned.

Associative Discrimination

Applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex. This is direct discrimination and occurs where someone is treated less favourably because they are associated with another person who possesses one of the above PCs.

Perceived Discrimination

Applies to age, race, religion or belief, sexual orientation, disability, gender reassignment and sex. This is direct discrimination and happens where someone is treated less favourably because they are perceived to have a particular one of the aforementioned PCs. It still applies even if that person does not have the PC.

Indirect Discrimination

Applies to age, race, religion or belief, sex, sexual orientation, marriage and civil partnership, disability, and gender reassignment. Indirect discrimination happens where there is a condition, rule, policy, or practice that applies equally to everyone, but has the effect of being disadvantageous to a particular group who share a PC and the requirement cannot be justified as a proportionate means of achieving a legitimate aim.

CarmichaelUK will not accept or act upon an indirectly discriminatory instruction from a client.

Harassment

Unwanted conduct related to age, race, religion or belief, sex, sexual orientation, disability, and gender reassignment 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.

Third Party Harassment

Candidates, employees, contractors and temporary workers can and should complain of behaviour they find offensive, humiliating, etc., even if:

- It is not directed at them.
- They do not have the relevant PC themselves.
- The behaviour is perpetrated by a third party who is not an employee of Carmichael[UK].
- The behaviour is based on perception or association.

In the event that an employee, candidate, contractor or temporary worker finds such behaviour offensive or believes it to be inappropriate, they should report it immediately to their line manager or HR, who will log the incident, investigate it and seek to prevent recurrence.

Sexual Harassment

Any unwanted physical, verbal or non-verbal conduct of a sexual nature 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 sexual harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.
A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

Reporting of Harassment

Whilst every effort is being made to avoid harassment and sexual harassment in the workplace, if it does arise it is important that it is promptly reported. If it is not reported it is difficult to address it and stop it happening again.

It is the duty of CarmichaelUK to investigate all reported incidences of harassment or sexual harassment and take steps to prevent it happening again.

Victimisation

When an employee, candidate, contractor or temporary worker is treated less favourably because they have made or supported a complaint or raised a grievance under The Equality Act 2010, or they are expected to do so. This form of discrimination applies to all PCs.

Occupational Requirement

If possessing a particular PC is a requirement of a job (not of an employer), CarmichaelUK will not employ or assign a candidate who does not possess that PC where the client can show that applying the requirement is a proportionate means of achieving a legitimate aim. The requirement must be crucial (or intrinsic) to the job and not merely one of several important factors.

Age

CarmichaelUK will not discriminate against any person because of their age.

We will not include age criteria in job specifications, advertisements, or interview/assessment processes.

EQUALITY, DIVERSITY & INCLUSION POLICY

We are committed to recruiting and retaining those whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

We will also inform clients of their obligations to shortlist on the basis of competence and skills and not age where they are responsible for decisions during the recruitment/selection process.

CarmichaelUK may request date of birth (date and month initially) as part of its recruitment process, but such information will not be used as selection, training, or promotion criteria or in any detrimental way and is only for compilation of personal data, which CarmichaelUK holds on all employees and workers and as part of its equal opportunities monitoring process.

Gender Reassignment

CarmichaelUK recognises that any employee, candidate, contractor or temporary worker may wish to change their gender during the course of their employment with CarmichaelUK.

We will make every effort to protect an employee, candidate, contractor or temporary worker who has undergone, is undergoing or intends to undergo gender reassignment from discrimination or harassment within the workplace.

Likewise CarmichaelUK will respect a person's gender identity, name and pronouns.

Any employee, candidate, contractor or temporary worker suffering discrimination or harassment in the workplace because of gender reassignment or gender identity should report the incident using the CarmichaelUK complaints procedure and where appropriate invoke the CarmichaelUK grievance procedure.

Religion or Belief

CarmichaelUK will not discriminate because of religious or other philosophical beliefs or because of non-belief. We are committed to recruiting and retaining those whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of religion/belief.

Sexual Orientation

CarmichaelUK will not discriminate directly or indirectly, harass, or victimise any person on the grounds of their sexual orientation. We will encourage clients not to include any sexual orientation criteria in job specifications and every attempt will be made to ensure clients recruit on the basis of competence and skills and not sexual orientation.

Carmichael^{UK} respects the rights of everyone irrespective of whether or not they are open about their sexual orientation.

Gender

CarmichaelUK will not discriminate directly or indirectly, harass, or victimise any person on the grounds of their gender. We will encourage clients not to include any gender criteria in job specifications and every attempt will be made to ensure clients recruit on the basis of competence and skills and not gender.

We are committed to recruiting and retaining those whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of gender.

Disability

Disability discrimination takes place where a detriment arising from disability occurs and the employer cannot show that the treatment was a proportionate means of achieving a legitimate aim. A disability is defined as an impairment that has a substantial and long-term effect on a person's ability to carry out normal day to day duties.

CarmichaelUK will not discriminate directly or indirectly, harass, or victimise any person on the grounds of their disability.

We are committed to recruiting and retaining those whose skills, experience, and attitude are suitable for the requirements of the various positions.

CarmichaelUK may request information regarding disability as part of its recruitment process, but such information will not be used as selection, training, or promotion criteria or in any detrimental way and is only for compilation of personal data, which CarmichaelUK holds on all employees, candidates, contractors and workers as part of its equal opportunities monitoring process. Any data shared will be anonymised. Information regarding disability will only be required when it is intrinsic to the role or to assist in putting in place reasonable adjustments (see below).

We will ensure that our staff (and where possible our clients) fulfil their duties by making reasonable adjustments throughout the recruitment process and in employment / engagement so that those with a disability can fully participate. This will include:

- Eliminating unlawful discrimination because of a disability.
- Eliminating harassment of people that is related to their disabilities.
- Promoting equality of opportunity between disabled persons and other persons.
- Taking steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.
- Promoting positive attitudes towards disabled persons.
- Encouraging participation by disabled persons in public life.

In addition to its legal obligations, we will follow structured procedures to satisfy the accessibility, recruitment, career development and training needs of the disabled persons in its employment. CarmichaelUK will not discriminate unlawfully because of disability when selecting candidates or contractors for submission for a vacancy or assignment or in any terms of employment or terms of engagement for contractors or temporary workers including:

- In the arrangements e.g., application form, interview, or arrangements for selection for determining to whom a job should be offered.
- In the terms on which employment is offered.
- By refusing to offer, or deliberately not offering the disabled person a job because of their disability.
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity.
- By subjecting a disabled person to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

- Because of a situation that is connected with their disability (i.e., discrimination arising from a disability) where such treatment cannot be objectively justified as being a proportionate means of achieving a legitimate aim.

Reasonable Adjustments

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of the employer to take such steps as are reasonable, to remove the provision, criterion, practice, or physical feature.

CarmichaelUK will take reasonable steps to provide auxiliary aids or services if this would make it easier for the disabled person to use their services.

To achieve this, CarmichaelUK must be informed that the candidate / employee has a disability together with the nature of the disability in order to make such reasonable adjustments or provide appropriate auxiliary aids and services.

CarmichaelUK will consider a range of reasonable adjustments for disabled employees including but not limited to:

- Making adjustments to access the premises.
- Allocating some of the disabled employee's duties to another person.
- Altering the employee's working hours.
- Assigning the employee to a different place of work.
- Allowing absence during working hours for rehabilitation, assessment, or treatment.
- Giving or arranging training for the employee.
- Acquiring or modifying equipment (e.g., IT software or modifying the workstation etc.).
- Modifying instructions or reference manuals.
- Modifying or providing alternative procedures for testing or assessment.
- Providing a reader or interpreter.
- Providing appropriate supervision and training.

Candidates, contractors and temporary workers are encouraged to let CarmichaelUK if they would benefit from reasonable adjustments on site as early as possible so that these can be explored further with the client.

Performance Monitoring, Management & Positive Action of Disabled Persons

Where candidates and existing employees have a disability, Carmichael^{UK} will:

- Review the requirements of job applicants and existing members of staff who have a disability to ensure that wherever possible reasonable adjustments are made to enable them to perform as well as possible during the recruitment process and while employed by the company.
- Not unreasonably limit the opportunities for promotion, access to benefits and facilities of employment and will make reasonable adjustments.
- Take all reasonable measures to enable disabled employees to participate fully in the workplace, in training and career development opportunities.

When an employee becomes incapable of carrying out his/her normal duties because of a disability, we will consider what reasonable adjustments could be made to the job and working conditions, or any other re-deployment and re-training possibilities. Where necessary, the Managing Director will arrange for an employee's capabilities to be assessed by an occupational health assessor with a view to identifying suitable alternative work for that individual.

If, having considered the above options, it is apparent that the employee cannot realistically continue in employment of any sort that CarmichaelUK is in a position to offer, a decision to dismiss may be taken only by the Directors following consultation with the Line Manager, the employee and his/her representative.

When a disabled employee's conduct (for reasons unconnected with the disability) is unacceptable, the Company's normal disciplinary procedures will apply.

Redundancy of Disabled Employees

In a redundancy situation the special circumstances of disabled employees will be given appropriate consideration and reasonable steps taken to ensure any selection criterion applied does not place a disabled employee at a disadvantage because of his/her disability.

Pre-Employment Health Questionnaires

In line with current legislation, CarmichaelUK will not ask questions relating to a candidate's health or disability either verbally or in writing prior to making a conditional job offer/short-listing for a specific assignment unless it is necessary for the purpose of:

- Establishing whether the candidate will be able to comply with a requirement to undergo an assessment for the job or establishing whether reasonable adjustments are needed in respect of any such assessment.
- Establishing whether the candidate will be able to carry out a function that is intrinsic to the work concerned.
- Establishing whether there is a duty to make reasonable adjustments for a disabled person in relation to the selection process.
- Monitoring diversity amongst candidates making the application for jobs.
- Taking positive action (e.g. guaranteed interviews for disabled people).
- Establishing an "occupational requirement" when having a particular disability is essential to the job.

Sickness/Absence

Under no circumstances will CarmichaelUK, during any part of the recruitment, selection or referencing process, discriminate against a candidate due to time off or absence from work due to ill-health or disability. CarmichaelUK will ensure all gaps are sensitively explored to understand an individual's background, to enable full support throughout the recruitment, selection and referencing processes.

Conditional Offers

CarmichaelUK will ensure that candidates are made aware of any offer of employment that is conditional on satisfactory responses to health-related questions and instruct them not to resign from their current role pending receipt of a satisfactory outcome. In the event that a conditional offer of employment is withdrawn because of a health-related issue, CarmichaelUK will provide the candidate

with feedback on the reasons for the withdrawal of the offer. This information will be documented and retained for audit purposes.

Accuracy of Health-Related Information

Where information relating to health or disability is required to establish whether a candidate will be able to carry out a function that is intrinsic to the work concerned, CarmichaelUK requires such questions to be answered honestly and in full. False information provided by a candidate in such circumstances may lead to withdrawal of the job offer or, in the case of an employee, disciplinary action.

Race

CarmichaelUK will not discriminate directly or indirectly, harass, or victimise any person on the grounds of their race. We will encourage clients not to include any race criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not race.

CarmichaelUK is committed to recruiting and retaining those whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of race.

No race requirements will be stated in any job advertisements on behalf of CarmichaelUK.

Pregnancy and Maternity

CarmichaelUK will not discriminate directly or indirectly or victimise any person on the grounds of pregnancy or maternity. People should be treated fairly in the workplace throughout their maternity period and supported appropriately through pregnancy. We will encourage clients to recruit on the basis of competence and skills and not discriminate due to pregnancy.

Marriages and Civil Partnerships

CarmichaelUK will not discriminate directly or indirectly or victimise any person on the grounds of marriage or civil partnership. People should be treated fairly in the workplace irrespective of their marital/civil partnership or family status.

Part-Time Workers

This policy also covers the treatment of those employees who work on a part-time basis. CarmichaelUK recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full-time employees (albeit, where appropriate, on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave, and access to pension facilities. CarmichaelUK also recognises that part-time employees must be treated the same as full-time employees in relation to training and redundancy situations.

Harassment & Dignity at Work

CarmichaelUK is committed to providing a work environment free from unlawful harassment. Harassment is defined as unwanted conduct. Examples (non-exhaustive list) of prohibited harassment are:

- Verbal or written conduct containing derogatory jokes or comments e.g., sexist, racist, homophobic, disablist.
- Slurs or unwanted sexual advances.
- Visual conduct such as derogatory or sexually orientated posters.
- Photographers, cartoons, drawings, or gestures which some may find offensive.

- Physical conduct such as assault, unwanted touching, or any interference because of any qualifying PC.
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss and offers of employment benefits in return for sexual favours.
- Retaliation for having reported or threatened to report harassment.
- Visual conduct such as derogatory or sexually orientated posters.
- Photographs, cartoons, drawings, or gestures which some may find offensive.
- Physical conduct such as assault, unwanted touching, or any interference because of any qualifying PC.
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss and offers of employment benefits in return for sexual favours.
- Retaliation for having reported or threatened to report harassment.

This policy prohibits unlawful harassment and sexual harassment.

Employees, candidates, contractors and temporary workers can complain of behaviour that they find offensive (including third party harassment) even if it is not directed at them.

Any person that believes they have been unlawfully harassed or who has witnessed harassment or offensive behaviour should make an immediate report to their line manager or HR followed by a written complaint as soon as possible after the incident in line with the CarmichaelUK Bullying and Harassment Policy or the CarmichaelUK Sexual Harassment Policy, as appropriate, and the CarmichaelUK Grievance Policy. Carmichaeluk's Whistleblowing Policy will also apply.

The complaint should include:

- Details of the incident
- The name or names of the individual or individuals involved.
- The names or names of any witness or witnesses.

Carmichael^{UK} will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, Carmichael^{UK} will take such steps as are reasonably practicable to mitigate and prevent continued harassment. Any employee who Carmichael^{UK} finds to be responsible for unlawful harassment will be subject to disciplinary procedures.

Monitoring & Positive Action in the Recruitment Process

Positive action will take place where:

- People who share a PC suffer a disadvantage connected to the characteristic or have needs that are different from those who do not share the characteristic.
- Participation in an activity by persons who share a PC is disproportionately low.

In these circumstances, proportionate steps will be taken to meet their needs or to enable and encourage them to overcome/minimise the disadvantage or participate in the relevant activity.

EQUALITY, DIVERSITY & INCLUSION POLICY

Monitoring

CarmichaelUK will monitor demographic and organisational data to ensure that there is not significant under-representation in participation in an activity by persons who share a particular PC and in the event that such under-representation is identified, will take appropriate remedial action.

Job Descriptions and Working Patterns

Job descriptions and/or person specifications will include only those requirements, qualifications and characteristics that are essential or desirable for the effective performance of the role. It will be made clear which items are essential and which are only desirable.

Whilst it is permissible to indicate the standard hours of a job and/or that it is full-time, if an employee or applicant wishes to propose some other pattern of work, this will be carefully considered and only rejected if it is justified.

Advertising, Recruitment and Promotion

CarmichaelUK will undertake all reasonably practicable steps to circulate information about vacant posts as widely as reasonably practicable in the circumstances.

No recruitment literature or advertisements will imply a preference for any one group of applicants, unless there is an occupational requirement which limits the post to a particular group, in which case this will be clearly stated. However, if there is an imbalance in the workforce, CarmichaelUK will actively welcome applications from candidates from underrepresented protected characteristic groups.

All selection interviews and shortlisting will be conducted on an objective basis and deal only with the individual's suitability for the job, taking into account their skills and experience.
Questions will only be asked during interview about a candidate's personal circumstances or plans if they relate directly to the job requirements and will then be asked of all candidates applying for the post.

Recruitment, employment, and promotion decisions will be made based on merit and evaluated against fair and objective criteria.

Training

Employees will be provided with appropriate training (depending on the needs of the business) to enable them to improve their performance and to achieve the performance standards and targets set for them by CarmichaelUK.

Special responsibility for the practical application of the CarmichaelUK equal opportunities policy falls upon managers and supervisors involved in the recruitment, selection, promotion, and training of employees, and/or conducting CarmichaelUK grievance and disciplinary procedures.

All reasonable measures will be taken to ensure that disabled employees are given the opportunity to participate fully in the workplace, in training and career development opportunities.

EQUALITY, DIVERSITY & INCLUSION POLICY

Positive Action – Training, Promotion and Conditions of Service

Under-represented groups will be encouraged to apply for training and employment opportunities with CarmichaelUK. Wherever possible, specific training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit.

Wherever necessary, use will be made of lawful exemptions to recruit suitably qualified people to cater for the specific needs of particular groups.

Wherever possible, efforts will be made to identify and remove unnecessary/unjustifiable barriers and provide appropriate facilities and conditions of service to meet the specific needs of disadvantaged and/or under-represented groups.

Personnel Records

To ensure the effective operation of the equal opportunity policy (and for no other purpose) a record will be kept of all employees' and job applicants' gender, racial origin, disability, age group, sexual orientation, and religious beliefs (should they choose to disclose these on the diversity monitoring questionnaire).

Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly restricted.
Such records will be analysed on a regular basis, and appropriate follow-up action taken.

Complaints

CarmichaelUK recognises that anyonewho feels that they need to bring a complaint of discrimination or harassment may feel vulnerable. Those individuals will receive support and reassurance and are assured that their complaint will be treated in the strictest confidence and need not fear that they will be victimised for bringing a complaint.

Any person who is found to have victimised or retaliated against another for complaining about or giving evidence about discrimination or harassment, may be subject to disciplinary action, up to and including dismissal, in accordance with CarmichaelUK disciplinary procedures.

Similarly, CarmichaelUK recognises that those who are accused of discrimination or harassment need to have their views heard and the allegations made against them investigated thoroughly. CarmichaelUK recognises that, whilst all acts of discrimination or harassment are serious, any action taken will depend upon the gravity of the allegation.

Where appropriate, an employee, candidate, contractor or temporary worker who feels that they has been the subject of discrimination or harassment should firstly inform the person responsible that their behaviour is discriminatory (and in the case of harassment unwelcome) and ask them to stop.

If the employee, candidate, contractor or temporary worker does not feel comfortable doing this, if the discrimination or harassment continues, or if there are employment consequences, a complaint should be made as follows:

- The employee, candidate, contractor or temporary worker who believes that they are the victim of discrimination or harassment should report the incident(s) to their line manager or HR. If they find this difficult or the complaint is against such a person, then they should make the complaint to the Managing Director, providing details of the complaint in writing.
- The people to whom a complaint is made are under a duty to log the complaint and immediately investigate the complaint themselves, or if they feel unable to do so, should refer the complaint to the Managing Director.
- All complaints will be handled in a confidential and impartial manner. The individual investigating the complaint should firstly discuss the situation with the employee affected. They should then make arrangements to interview the individual against whom a complaint has been made. These two procedures should be completed within a week of the complaint being made, depending on the availability of the parties, and should be fully documented.
- Employees, temporary workers or contractors against whom a complaint has been made are assured a fair and impartial hearing and the chance to put forward their side of the story. Full details will be given of the complaint in writing before the investigatory interview and the individual concerned will be offered the opportunity to be interviewed.
- It may also be necessary to place any person accused of harassment on investigatory suspension depending on the circumstances of the particular allegation(s).
- If it is necessary to interview others who may have witnessed acts of harassment, these individuals can be assured of the same degree of confidentiality.
- After hearing both sides of the complaint, the individual investigating the complaint will make a decision. If the investigation reveals that the complaint is valid, the individual investigating the complaint will take prompt action to stop the discrimination or harassment and to prevent its reoccurrence. CarmichaelUK disciplinary procedures will be used as appropriate, and a disciplinary hearing will be convened before any disciplinary action is taken. CarmichaelUK will inform both parties in writing of the outcome and the action to be taken as soon as that decision is made.
- If either party is dissatisfied with the outcome of the investigation or the disciplinary action taken, they should refer to the disciplinary or grievance procedures as appropriate.

Where a complaint is upheld, Carmichael^{UK} will monitor the situation to prevent reoccurrence.

In the event that a contractor or temporary worker experiences or witnesses harassment or offensive behaviour on site, they should report this to their line manager at the client's workplace and also to their main point of contact at CarmichaelUK. In such instances, CarmichaelUK will work with the client and do everything that is practicably possible to ensure the matter is appropriately investigated and to prevent recurrence.

EQUALITY, DIVERSITY & INCLUSION POLICY

Responsibilities of CarmichaelUK

It is the direct responsibility of the Managing Director to ensure the implementation of this policy on a day-to-day basis. However, all employees, contractors and temporary workers have a responsibility to accept their personal involvement in applying it and must:

- Be familiar with the policy and ensure that it is followed by both themselves and employees for whom they have a responsibility.
- Be aware of their obligations under current equality and diversity legislation.
- Be aware of the benefits of diversity and equality.
- Act in ways that respect and value the diversity of others.
- Always set a positive example.
- Listen to and respect others and discourage discriminatory speculations.
- Challenge any behaviour that could be interpreted as discriminatory.
- Notify their line manager of any apparent instances of discrimination, harassment or victimisation, and log these accordingly.

Disciplinary action may be taken against any employee who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach of this policy or repeated breaches. In other cases, it may include a warning, oral or written. Disciplinary action (which may include summary dismissal) may also be taken against any employee who makes malicious or vexatious allegations of discrimination, harassment, or victimisation. Such action will be taken in accordance with the CarmichaelUK disciplinary procedure.

Breaches of this policy may also result in the employee responsible being held personally liable for compensation if the person who has been discriminated against/harassed/victimised takes legal action. Contractors and those engaged by CarmichaelUK other than as an employee or worker may find their contracts immediately terminated in the event of a breach of this policy.

All other individuals who work at or visit CarmichaelUK are also required to comply with the terms of the policy.

Responsibilities of Employees

All employees of CarmichaelUK have a responsibility to accept their personal involvement in applying this policy. They must be familiar with the policy and ensure that it is followed by themselves, other employees, contractors, temporary workers, and suppliers for whom they are responsible.

EQUALITY, DIVERSITY & INCLUSION POLICY

Approval & Review

This policy will be reviewed once a year to ensure continuing suitability with business requirements. As necessary additional alterations may be made from time to time in the light of legislative changes, operational procedures, or other prevailing circumstances.

This policy has been approved by the Board of Directors to ensure it is fit for the purposes of the business in respect of managing the risk of equality, diversity & inclusion.