

EQUALITY DIVERSITY & INCLUSION POLICY

1 Introduction

- 1.1 This policy sets out Axis CLC's approach to equality, diversity and inclusion. Axis CLC is committed to promoting equality, diversity and inclusion and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.
- 1.2 The company aims to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training and development of employees and to proactively tackling and eliminating discrimination.
- 1.3 This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (eg. at meetings, social events and social interactions with colleagues) or which may impact Axis CLC's reputation (eg. the expression of views on social media, contrary to the commitments expressed in this policy).

2 Equality, Diversity and Inclusion at Axis CLC

- 2.1 At Axis CLC it is considered that equality means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups both in employment and in the services the company provides.
- 2.2 We consider diversity to mean celebrating difference and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for the company too.
- 2.3 We acknowledge that equality and diversity are not interchangeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

3 Rights and Obligations

- 3.1 The rights and obligations set out on this policy apply equally to all employees, whether part-time or full-time, on a permanent or temporary contract and also to workers such as contractors, consultants and agency employees.
- 3.2 All employees and workers have a personal responsibility for the application of this policy. As part of your induction you are expected to read and familiarise yourself with this policy, ensure this policy is properly observed and fully complied with.
- 3.3 This policy is of particular relevance to directors, line managers and employees concerned with recruitment, learning and development and promotion procedures and employment decisions which affect others.

4 Axis CLC Commitment

- 4.1 Every employee is entitled to a working environment that promotes dignity, equality and respect for all. The company will not tolerate any acts of unlawful or unfair discrimination

(including harassment) committed against an employee, contractor, job applicant or visitor because of a protected characteristic:

- Sex
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including ethnic origin, colour, nationality and national origin)
- Disability
- Sexual orientation
- Religion of belief
- Age

Discrimination on the basis of work pattern (part-time working, fixed term contract, flexible working) which is unjustifiable will also not be tolerated.

- 4.2 All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in the company. Selection for employment, promotion, training or any other benefit will only be on the basis of aptitude and ability.
- 4.3 No form of intimidation, bullying or harassment will be tolerated.
- 4.4 Should an employee believe they may have suffered discrimination because of any of the above characteristics, they should consider the appropriateness and feasibility of attempted informal resolution by discussion in the first instance with their line manager or another colleague in a relevant position of seniority. An employee may decide, in the alternative, to raise the matter through the Bullying and Harassment Policy or the Grievance Policy.
- 4.5 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. The company will ensure individuals who make such allegations in good faith will not be victimised or treated less favourably by the company as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under the disciplinary policy.
- 4.6 A person found to have breached this policy may be subject to disciplinary action.
- 4.7 Employees may also be personally liable for any acts of discrimination prohibited by this policy that they commit, meaning they can be sued by the victim.

5 Types of Discrimination

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

- 5.1 **Direct Discrimination:** treating someone less favourably because of a protected characteristic, including a perceived protected characteristic or the protected characteristic of an associated third party. This could include paying someone less because of their sex or rejecting a job applicant because of their race or because they may be homosexual.

- 5.2 **Indirect Discrimination:** applying a provision, criterion or practice that applies to everyone but disadvantages people with a protected characteristic more than others and is not justified. An example would be a requirement for an applicant for a particular role to work full-time. This would disadvantage women who are more likely to want or need to work part-time due to domestic or childcare responsibilities. This requirement would be indirectly sex discriminatory unless it could be objectively justified.
- 5.3 **Harassment:** unwanted conduct related to a protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment also includes sexual harassment which is conduct of a sexual nature (including but not limited to unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal, non-verbal or physical conduct of a sexual nature, subjecting someone to obscene or other suggestive comments, sexual jokes or images).
- 5.4 **Victimisation:** subjecting someone to a detriment (including retaliation) because they have complained about or supported someone else's complaint about discrimination or harassment.

6 Disability

- 6.1 Employees and job applicants who are disabled or become disabled are encouraged to tell the Company about their condition so that appropriate support can be offered.
- 6.2 The Company is committed to considering reasonable adjustments that would help overcome or minimise the effect of any difficulties connected with a disability. Should an employee or job applicant experience any difficulties, they are encouraged to discuss these with a member of the HR team or, in the case of employees, their manager. It may be necessary to obtain medical advice about potential adjustments before any decisions are made.
- 6.3 The Company will regularly review the physical features of its premises to ensure that people with a disability are not placed at a substantial disadvantage and will take reasonable steps to improve access where necessary.

7 Recruitment, Selection, Assessment and Promotion

- 7.1 In furtherance of this policy, the recruitment policy aims to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected grounds and which are not justified by the demands of the job. The company's practice will be to:
- Use job profiles as the basis of all recruitment activity
 - Ensure that criteria for recruitment are job-related and demonstrate a direct link to the job profile
 - Expose vacancies to as wide a pool of potential applicants as practical by considering wording of advertisements and where these are published
 - Train employees involved in recruitment and promotion to eliminate the risk of discriminatory attitudes affecting decision making
 - Ensure all employees have the opportunity to develop themselves and to progress within the organisation

- Ensure that the company has succession planning in place to identify those employees who are ready for promotion

8 Monitoring

- 8.1 All employees are asked to complete an equality and diversity monitoring form and the content of these forms is used to regularly monitor the composition of its workforce and help the company assess its performance against its equality and diversity strategy. Completion of the equality and diversity monitoring form is voluntary and will not disadvantage any individual in relation to employment processes, eg. recruitment, promotion, training and development etc.
- 8.2 Axis CLC will use employee surveys to assess the success of the Equality, Diversity and Inclusion Policy.

Version Control

Version	Date	Author	Change Description
Axis CLC v1.0	October 2025	HR	Axis CLC joint policy