



Veriflo
Water Asset Management

POLICY 009: Equity and Dignity at Work

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EQUITY AND DIGNITY AT WORK POLICY

1 Commitment

The Company is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the Company.

The Company will not discriminate because of age, disability, gender reassignment or identification, marriage and civil partnership, pregnancy and maternity/paternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex, or sexual orientation. It will not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness, and transparency.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions, or words that transgress the policy will not be tolerated and will be dealt with in line with the Company's disciplinary policy.

The policy is applicable to all employees, agency staff, clients, communities, suppliers, and contractors, whether permanent or temporary. The policy applies to all processes relating to employment and training, and to any dealings with customers, clients, and the public alike. Decisions relating to clients and communities will be based on business-related criteria only and any irrelevant information will not form part of the process.

2 The law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion, or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, for example refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or the physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. It is also unlawful discrimination where a disabled employee is at a substantial disadvantage due to the employer's unreasonable failure to provide an auxiliary aid or service to the disabled employee.

It is generally unlawful to discriminate directly or indirectly, harass or victimise a member of the public based on any of the protected characteristics in the provision of services, goods, or facilities.

It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

3 Equity and Equality

The term "equity" refers to fairness and justice and is distinguished from equality: Whereas equality means providing the same to all, equity means recognising that we do not all start from the same place and making

acknowledgements and adjustments to counteract these imbalances. The Company understands that there is a time and place for both values.

At Veriflo we believe that workplace equity is the fair treatment of our employees – even if it means giving certain employees different opportunities and levels of support than others. While society mostly talks about equality, equity is just as significant at Veriflo.

In an equitable workplace, people with different cultures, religions, races, physical and hidden abilities can access the tools and benefits necessary for comparable job performance. These tools give everyone an equal opportunity for success within the Company’s means, which is how equity and equality go hand in hand.

The Company is able to offer equity to employees through annual appraisals and pay reviews, it offers all employees the opportunity to apply for internal vacancies, and support from our Learning and Development Team on designing personalised personal development plans and action learning sets. Where appropriate, additional and within reason physical resources and equipment will be procured, and reasonable adjustments made to provide employees with tailored support.

The Company commits to achieving this by understanding the individuals it employs as early as the recruitment stage and relies upon employees sharing their own individual needs in order to foster an equitable environment.

3.1 Awareness

For employees, from recruitment and induction onward, Veriflo’s commitment to equality and dignity in the workplace is a clear and consistent message;

- Recruitment adverts (long form) state that Veriflo is an equal opportunities employer.
- Interviewing and recruitment operations are performed aligned with best practices, with the support of HR personnel.
- The Company induction makes our commitment clear
- All personnel review and sign this policy during onboarding

External to the organisation, this message is conveyed through;

- the publishing of this policy on our website
- adherence to client equality initiatives
- specific challenges relating to equality during PQQ and appraisal of suppliers & subcontractors
- other Company communications and initiatives as covered in POL 004: Corporate Social Responsibility policy

4 Recruitment

The Company is committed to attracting and retaining the best people in its sector by providing competitive, challenging and flexible employment packages.

Equity of opportunity is critical to Veriflo; the Company has developed a policy that not only complies with the law, but also works to establish a fair and positive workplace for the future. All recruitment and development of employees will be based on merit and free from discrimination.

It is the Company’s policy to:

- Ensure no job applicant receives less favorable treatment on any personal grounds, including those of age, disability, gender or gender re-assignment, marital status, race, skin colour, nationality, ethnic or national

origin, religion or belief, sexual orientation, medical condition, or background at any stage of the recruitment process

- Regularly review all relevant company policies to ensure full legal compliance
- Adhere to all anti-discrimination guidance at all times to ensure individuals are selected solely on the basis of their merits and abilities
- Maintain a program of recruitment and development for apprentices, trainees and graduates
- Ensure team members involved in recruitment and selection are aware of their responsibilities in respect of this and related policies and communicate the Company's commitment to the promotion of equal opportunities in all recruitment advertisements, inductions and supporting literature.
- Make necessary checks to ensure that team members are legally permitted to work in the UK in line with the Immigration, Asylum and Nationality Act 2006

The Company places great emphasis on the value of adopting a comprehensive range of selection and placement techniques designed to ensure that it recruits and appoints suitably qualified employees who exhibit the necessary capabilities and behaviours.

Those employees who are involved in recruitment of employees, and all agencies who supply employees are informed of their responsibilities under this policy and the applicable legal requirements and should review and implement the standards established in supporting anti-discrimination policies and procedures.

4.1 Right-to-Work checks

When applicants are selected for employment, they will be required to submit evidences of their specific competencies; they are also legally required to provide documentation to satisfactorily establish that they have the right to work in the UK such as a suitable form of Government-issued identification at this stage which clearly denotes Nationality.

Veriflo welcomes personnel of all Nationalities, provided they have the legal right to work in the UK. Documents provided will be assessed strictly in line with the guidance provided on the 'Full Guidance for Employers on Preventing Illegal Working 2013' and 'Home Office Right To Work Checklist' based upon it.

A periodic review of Right-to-Work documentation shall be made;

- should any provided document expire
- if there is any doubt raised about any individual's legal working status
- If the team member is promoted or changes role
- After any lapse in employment (i.e. all returning workers)

5 Dignity at work

The Company is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.

Some harassment activity qualifies as unlawful discrimination and serious harassment may be a criminal offence.

5.1 Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate, or injure the person on the receiving end. Examples of bullying would include negatively singling someone out or setting them up to fail or making threats or comments in relation to an employee's job security without good reason.

5.2 Harassment

Harassment is unwanted conduct related to relevant protected characteristics: sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Examples of harassment could include:

- Physical conduct ranging from unwelcome touching to serious assault
- unwelcome sexual advances
- demeaning comments about a person's appearance
- degrading comments regarding a person's age, gender, or health such as being at a menopausal age.
- unwelcome jokes or comments of a sexual or racial nature or about an individual's age
- excluding an individual because they are associated or connected with someone with a protected characteristic, for example their child is gay, spouse is black, or parent is disabled
- repeated name calling related to an individual's religion or belief
- ignoring an individual because they are perceived to have a protected characteristic (whether or not they do, in fact, have that protected characteristic), for example an employee is thought to be Jewish, or is perceived to be transgender
- the use of obscene gestures
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person or relating to their actual or perceived protected characteristic, e.g. magazines, calendars, or pin-ups

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others.

Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, for example sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, for example certain "banter" or flirting or advances. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

A single incident can be harassment if it is sufficiently serious.

5.3 If subjected to harassment

If any employee is bullied or harassed, they may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. The employee may feel able to approach the person themselves, or with the help of a suitable representative at the Company. The employee should tell the person what behaviour is offensive and unwelcome and make an instruction for it to stop immediately.

If an informal approach does not resolve matters, or it is deemed too serious to be dealt with informally, the employee can make a formal complaint by using the Company's grievance procedure. In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that employees can choose

whether to raise your grievance with their Line Manager or with another Manager.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. Employees have the right to be accompanied by a representative of their choice at any meeting dealing with your grievance. Employees will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

The Company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

Employees have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that the employee knows to be untrue may lead to disciplinary action being taken against them.

6 Your responsibilities

Every employee is required to assist the Company to meet its commitment to provide equity of opportunity in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Company, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.

7 Acknowledgement and Acceptance

This policy will be made available on BreatheHR and by acknowledging you have read and understood the policy you agree to the terms outlined in this policy.

Approved and implemented.

Kirsty Scott, Business Director, Veriflo Ltd.

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