

Ebbon

— GROUP —

Title: Equality, Diversity and Inclusion Policy

Version: 1.1
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Equality, Diversity and Inclusion Policy

Version	Date	Who	Details
1.0	23/03/24	TH	First draft for review
1.1	26/03/24	SM	Reviewed
1.1	28/03/24	MD/HR	Version approved for publication

Public

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1.0 Definitions & Abbreviations

ESG – Environmental, Social and Governance

The Company – Ebbon Group Ltd (including trading as Ebbon Automotive), Ebbon Intelligence Ltd Licence Check Ltd and DriverCheck Ltd

Directors – the executive fiduciary directors (currently the 2 joint CEOs), the Managing Directors of Ebbon Automotive & Ebbon Compliance & the Group Technical Director

Harassment – means unwanted conduct that has the effect of violating the victim’s dignity or creating an intimidating, hostile, degrading or offensive environment.

Interested Parties – the owners, the employees, the customers & suppliers of the Company, the relevant authorities in the territories in which the Company operates and the community at large (including charities)

Victimisation – will occur where a person is treated less favourably because they have initiated or intend to bring proceedings or take action or give evidence.

2.0 Introduction

This Policy forms part of The Company’s formally approved and adopted ESG Strategy.

The Company is committed to achieving a working environment that provides equality of opportunity, diversity and inclusion among our workforce and freedom from unlawful or unfair discrimination. The aim is for our workforce to be truly representative of all sections of society and reflective of our customer base. It is critically important that each of our employees feels respected and able to give their best within the workplace.

The Company further aims to provide services that do not unfairly discriminate against clients and customers in the provision of its products and services. It is committed to the prevention of unlawful discrimination of customers or other Interested Parties.

3.0 Objectives of this Policy

This policy’s purpose is to: -

- 3.1 Provide equality, fairness and respect for all Company employees whether on temporary, fixed term, part-time or full-time terms.
- 3.2 To prevent and challenge unlawful discrimination against employees and Interested Parties under the provisions of the Equality Act 2010 in respect of the following protected characteristics:
 - 3.2.1 age
 - 3.2.2 disability including physical impairment and neural diversity
 - 3.2.3 gender reassignment
 - 3.2.4 marriage and civil partnership
 - 3.2.5 pregnancy and maternity
 - 3.2.6 race (including colour, nationality, and ethnic or national origin)
 - 3.2.7 religion or belief
 - 3.2.8 gender
 - 3.2.9 sexual orientation
- 3.3 Actively discourage and address all forms of unlawful discrimination in relation to:
 - 3.3.1 employee pay and benefits
 - 3.3.2 their terms and conditions of employment
 - 3.3.3 dealing with grievances and discipline
 - 3.3.4 dismissals
 - 3.3.5 redundancies
 - 3.3.6 leave for parents and carers
 - 3.3.7 requests for flexible working

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- 3.3.8 selection for employment and advancement within the Company in relation to promotions, training or other developmental opportunities.
- 3.4 To reinforce the principle that opportunity and reward within the Company is solely determined on the basis of capability, qualifications, experience, skills and productivity.

4.0 Responsibility for Policy

The HR Manager shall be responsible for this policy document. They will be assisted in its review and measurement by the Directors and senior management team.

5.0 Company Commitment

The Company will:

- 5.1 Encourage equality, diversity and inclusion in the workplace recognising that this is not only good practice but also encourages positive co-operation, employee wellbeing and therefore makes good commercial sense
- 5.2 Create a working environment free from bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued. This commitment will include training managers and all other employees about their rights and responsibilities under this equality, diversity and inclusion policy.
- 5.3 By introducing suitable checks and other measures, ensure that staff conduct themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination in work and against Interested Parties. All staff should understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment.
- 5.4 Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.
- 5.5 Ensure any such acts are promptly dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and take appropriate action. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Any sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- 5.6 Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Company.
- 5.7 Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- 5.8 Under guidance from the HR Manager review employment practices and procedures when necessary to ensure fairness, and also update them, the Employee Handbook and this policy to take account of changes in the law.

6.0 Positive Action in Recruitment

Under the provisions of the Equality Act 2010 the Company may take 'positive action' in the recruitment and employment of people in order to encourage persons from groups with different needs or with a past record of disadvantage or historically low levels of participation to apply for positions with the Company. Where the Company chooses to use positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably than other applicants. It will only be used in a tie-break situation where there are candidates of equal merit applying for the same role or position.

7.0 Reasonable Adjustments

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. This could include adjustments to premises, transfers or the reallocation of duties, the provision or modification of IT systems and other equipment to support physical incapacity or assistive technologies, or any other adjustments that the Company considers reasonable and necessary - provided such adjustments are within the financial means of the Company and are permitted.

8.0 Monitoring and Measurement

The senior management team, with the support of the Directors have overall responsibility and authority to ensure that this Policy is effectively implemented and delivered throughout the Company.

All Company staff have responsibilities in relation to equality and diversity and are encouraged to build awareness of equality and actively challenge all instances of inequality thus helping remove barriers to access, achievement and progression.

This policy and the Company's performance in meeting its requirements will be monitored and reviewed as a minimum, on an annual basis.

The senior management team will collect data on and review the make-up of the workforce with reference to information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

This Policy and the Company's performance in meeting its requirements will be monitored and reviewed as a minimum, on an annual basis.

9.0 Breaches of the Policy

Failure to comply with this Policy, supporting policies and supporting procedures, may result in disciplinary action being taken.

In the case of suspected discrimination the Company reserves the right to check correspondence and logs including any emails (and company phone if applicable) for evidence.

10.0 Status of Policy

This Policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as implied, collateral or express terms to any contract made with the Company.

The Company reserves the right to amend and update this Policy at any time.