

DIVERSITY & EQUAL OPPORTUNITIES POLICY - 2024

Social Justice Statement

*Geiger, as a company and as caring people, is committed to cultivating and preserving a culture of **Justice, Equity, Diversity, Inclusion, and Sustainability**. A **JEDIS** culture guides our deliberations, actions, and conduct. Our greatest strengths are derived from the collective sum of the individual differences, life experiences, knowledge, innovation, self-expression, and talent. Treating every person and our planet with respect not only makes our company strongest, but also contributes to making the world better. It has never been more important or more urgent.*

Policy statement

It is the Company's policy not to discriminate against its workers on the basis of their sex, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, HIV positive/AIDS status, disability or age, pregnancy or maternity, trade union membership or the fact that they are a part-time worker or a fixed-term employee. The Company aims to create a culture that encourages and values diversity and that appoints, rewards and promotes staff based on merit.

Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. The Company shall, at all times, strive to work within legislative requirements as well as promoting best practice. The aim of the Company is that the composition of our workforce should reflect that of the community and that all workers should be offered equal opportunities to achieve their full potential. This policy, and the measures we take to implement it, have been devised on the basis of advice from relevant government and professional bodies. We are committed to a programme of action to make this policy effective and to bring it to the attention of all workers. The principle of diversity, non-discrimination and equality of opportunity applies equally to the treatment of visitors, clients, customers and suppliers by members of our workforce and also, in some circumstances, ex-employees.

The following paragraphs deal with the specific categories of workers and areas of work which we have identified as potentially giving rise to equal opportunities issues and provides more specific guidance on the parameters of our policy and approach to diversity & equal opportunities.

This policy is for guidance only and shall be provided to all workers, but does not form part of your contract of employment and may be amended from time to time.

1. SCOPE: TO WHOM DOES THIS POLICY APPLY?

- 1.1 This policy applies to the Geiger UK Ltd. employees based in UK, whether permanent, temporary, casual, part-time or on fixed-term contracts, to ex-employees, to job applicants and to individuals such as agency staff and consultants who are not our employees, but who work at the Company (collectively "workers").

- 1.2 All workers have a duty to act in accordance with this policy, to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them. In some situations, the Company may be at risk of being held responsible for the acts of individual members of staff and will not therefore tolerate any discriminatory practices or behaviour.
- 1.3 The policy statement applies equally to the treatment of our visitors, client's customers and suppliers by our workers.

2. PERSONNEL RESPONSIBLE FOR IMPLEMENTATION OF POLICY

- 2.1 **Human Resources** is responsible for this policy, for encouraging diversity in our workplace, and any necessary training on equal opportunities. All workers must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives. Those working at a management level have a particular responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the Company with regard to diversity and equal opportunities.
- 2.2 Any workers involved in management or recruitment, or who have questions about the content or application of this policy, should contact **Human Resources** to request training or discuss these.

3. PURPOSE OF POLICY & QUANTITATIVE TARGETS

- 3.1 This policy sets out the Company's approach to diversity and equal opportunities and applies to the advertising of jobs and recruitment and selection, training and development, opportunities for promotion, conditions of service, benefits and facilities and pay, health and safety, conduct at work, grievance and disciplinary procedures and termination of employment, including redundancy.
- 3.2 Quantitative targets include:
 - Increase levels of equality, diversity and inclusion in the workplace year on year.
 - Achieve zero reports of unlawful acts of discrimination, bullying and harassment year on year.
 - Provide training and education to 100% of managers and all other employees about Diversity, Equality and Inclusion related topics in 2024, and ensure they are aware of their rights and responsibilities under this policy.

4. FORMS OF DISCRIMINATION

- 4.1 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) and on work related trips or events including social events.
- 4.2 The following forms of discrimination are prohibited under this policy and are unlawful:

- a. Direct discrimination occurs where someone is treated less favourably because of their 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 ("protected characteristics"). For example, rejecting an applicant because of their race on the basis that they would not "fit in" would be direct discrimination.
- b. Indirect discrimination occurs where an individual is disadvantaged by an unjustified provision, criterion or practice (or policy) that is applied to all workers, but which adversely affects people with a particular protected characteristic more than others and is not justified. For example, a minimum height requirement is likely to disadvantage women as collectively they are less likely to be able to comply with the requirement than men. If the minimum height requirement cannot be objectively justified for a reason unconnected with sex, it would be indirectly discriminatory on the grounds of sex.
- c. Victimisation (less favourable treatment because of having complained or supported an allegation of discrimination or harassment).
- d. Harassment (unwanted conduct which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them). See the Company's Anti-harassment Policy at Appendix 2.
- e. Disability discrimination 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.

5. RECRUITMENT AND SELECTION

- 5.1 The Company aims to ensure that no job applicant receives less favourable treatment because of any of the protected characteristics referred to above. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are proportionate and justifiable on non-discriminatory grounds as being essential for the effective performance of the job. Shortlisting will be done by more than one person where possible.
- 5.2 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. The Company shall take reasonable steps to ensure that knowledge of vacancies reaches a wide labour market. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our diversity and equal opportunities policy and a copy of this policy shall be sent to those who enquire about vacancies.

- 5.3 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.
- 5.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision making purposes.

6. STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

- 6.1 Staff training needs will be identified through ongoing assessment and two way communication. All workers will be given an equal opportunity and access to training to enable them to progress within the organisation. All promotion decisions will be made on the basis of merit.
- 6.2 The composition and movement of workers at different levels 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 unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.
- 6.3 Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them. This includes pay, bonus criteria, policies and all benefits offered, such as private medical insurance, dental insurance and life insurance coverage.

7. TERMINATION OF EMPLOYMENT

- 7.1 We will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.
- 7.2 We will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

8. DISABILITY DISCRIMINATION

- 8.1 If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition so that we may take appropriate steps to support you. You should also advise your line manager of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. Your line manager may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the

needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments and in such cases we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

9. FIXED-TERM EMPLOYEES

9.1 Fixed term staff should be treated the same as comparable permanent staff and enjoy no less favourable terms and conditions, unless different treatment is justified. The Company will monitor our use of fixed-term employees, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress within the Company to ensure that they are accessing permanent vacancies.

10. PART-TIME WORKERS

10.1 Part time staff should be treated the same as comparable full time staff and enjoy no less favourable terms and conditions (on a pro rata basis), unless different treatment is justified. The Company will monitor the conditions of service of part-time employees and their progression within the Company to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will also ensure requests to alter working hours are dealt with appropriately under our Flexible Working and Time off for Dependents Policy (see **Appendix 9, Part 5**).

11. BREACHES OF THE POLICY

11.1 If you believe that you may have been discriminated against, you should first raise this informally with your line manager. If this does not resolve the issue, you may raise a formal grievance in accordance with the Company's Grievance Procedure (Appendix 6) or Anti-harassment and Bullying Policy, as appropriate.

11.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure (Appendix 3).

11.3 If, following investigation, you are found to have committed any act of discrimination, harassment or victimisation, or to have otherwise breached this policy, you will be subject to disciplinary action. Such behaviour may constitute gross misconduct and may result in summary dismissal. The Company will always take a strict approach to serious breaches of this policy.

12. REVIEW MECHANISM

12.1 The policy is reviewed on an annual basis by the members of the HR and Senior Management Team and updates are communicated to all stakeholders.

