

## **Diversity, Equity & Inclusion Policy**

### **Diversity, Equity & Inclusion statement**

Individuals with different cultures, perspectives and experiences are at the heart of the way MiCiM works. We want to recruit, develop and retain the most talented people, regardless of their background and make best use of their talents. At MiCiM we are guided by our values in everything we do and recognise that being a diverse and inclusive employer helps us fulfil our responsibility to make a difference to our clients. We seek to develop a work environment where we treat all employees as individuals, fairly and in a consistent way. We work within the spirit and the practice of the Equality Act 2010 by promoting a culture of respect and dignity. We will continue to support our leaders, managers, employees and staff members to demonstrate the principles of diversity and inclusion in their everyday activities, roles and functions.

### **Purpose**

This policy sets out MiCiM's approach to equality and diversity. MiCiM is committed to promoting equality and diversity, 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. MiCiM aims to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, promotion, training and development, transfers, performance management, remuneration, grievance and disciplinary procedures, selection for redundancy and dismissal, and to pro-actively tackle and eliminate any form of discrimination.

Our objective is that within MiCiM we provide a fair and equal working environment that is free from all forms of discrimination. The Company believes all employees and job applicants have the right to be protected from unfair treatment and we will only differentiate on merit and the ability to do the job.

It also applies to temporary staff, contractors and consultants and all third parties that the Company engages. Unless otherwise stated, all reference to employees includes potential employees, former employees, as well as agency workers, temporary workers and contractors.

### **Diversity, Equity and Inclusion at MiCiM**

At MiCiM, we consider that equality means breaking down barriers, eliminating discrimination and ensuring equal opportunities and access for all groups both in employment, and to goods and services. 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 MiCiM too. We acknowledge that equality and diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed.

### **Scope**

The rights and obligations set out in this policy apply equally to all employees, whether part time or full time or on a fixed-term contract, and also to associated persons such as secondees, agency staff, self-employed contractors and others employed under a contract of service. You have 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 that this policy is properly observed and fully complied with and to complete the declaration below.

This policy is also of particular relevance to directors, line managers and other employees concerned with recruitment, training and promotion procedures and employment decisions which affect others. Managers are responsible for implementing this Equal Opportunities Policy and for applying the policy as part of their day to day management of MiCiM.

All employees and staff members have a responsibility not to discriminate against fellow employees and to report any such behaviour of which they become aware.

## MiCiM's commitment

Every employee is entitled to a working environment that promotes dignity, equality and respect for all. MiCiM will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, agency staff, contractor, job applicant or visitor because of the following protected characteristics:

- sex;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including ethnic origin, nationality and national origin);
- disability;
- sexual orientation;
- religion and or belief; and
- age.

## Forms of Discrimination

The following are forms of discrimination that this policy aims to prevent:

**Direct discrimination** – occurs where a person is treated less favourably because of their race, religion and belief, sex, marriage or civil partnership, pregnancy and maternity, disability, gender re-assignment, age, or sexual orientation.

**Associative discrimination** – occurs where a person is discriminated against because they associate with someone who has a protected characteristic.

**Perceptive discrimination** – occurs where a person is discriminated against because they are perceived to have a protected characteristic, even if they do not actually have that characteristic.

**Indirect discrimination** – occurs where a provision, criterion or practice is applied to all employees but is liable to disadvantage individuals who share a particular protected characteristic. Indirect discrimination is still unlawful (unless it can be justified) even when the provision, criterion or practice causing the disadvantage has been unintentionally applied.

**Victimisation** – occurs where someone is treated in a disadvantaged way as a result of making a claim, making an allegation of discrimination or giving evidence or information in connection with another person's claim.

**Harassment** – occurs where there is unwanted conduct relating to a relevant characteristic and the conduct has the purpose of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also covers associative and perceived characteristics.

Harassment can take many different forms and may involve inappropriate actions, behaviour, comments or physical contact or gestures that cause offence or is objectionable. Physical contact includes for example; touching, pinching, pushing, grabbing, shoving, punching and other forms of physical assault. Harassment may also include victimisation, bullying, lewd remarks, demand of a sexual nature or the placing of items of a potentially offensive nature within view of employees or distributing such material by mail, mobile phone, text message, telephone, fax, email, photograph, uploads onto websites or any other electronic means.

The Company will treat allegations of harassment seriously and take the necessary steps to deal with such allegations appropriately. This includes any allegations which may have arisen from third parties, for example clients or suppliers.

**Disability Discrimination** – MiCiM will ensure that employment policies and practices fully comply with current legislative provisions and will consider making appropriate reasonable adjustments to ensure that disabled applicants or employees are not disadvantaged or suffer discrimination arising from their disability.

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

Any employee found to be acting in a discriminatory manner, whether directed towards fellow employees, contract workers, suppliers, clients or any other person that employees come into contact with while at work or on Company business will be dealt with under the Company's Disciplinary Procedure. This could lead to their dismissal from the Company.

Employees should also be aware that in certain circumstances, should they be found guilty of discrimination they may be personally and legally liable for their actions.

### **When does this policy apply?**

This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g. at meetings, social events and social interactions with colleagues) or which may impact on MiCiM's reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to MiCiM). We set out below some specific areas in which the Company will seek to ensure equal opportunities in the workplace, including:

#### *a) Recruitment and selection decisions*

Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and the Company will make decisions regarding an applicant's suitability for a position on the basis of reasonable job-related criteria. Selection for employment at MiCiM will be on the basis of aptitude and ability.

#### *b) Training*

All employees will be encouraged to develop their skills and fulfil their potential and to take advantage of training, development and progression opportunities in MiCiM to encourage the promotion of the principles of this policy.

#### *c) Promotion*

All promotion decisions will be made on the basis of merit and will not be influenced by any of the protected characteristics listed above. Promotion opportunities will be monitored to ensure equality of opportunity at all levels.

#### *d) During employment*

Terms and conditions of employment, including pay and benefits, will be offered to employees fairly and equally. All employment-related policies, procedures and practices such as career development, promotion and access to training are non-discriminatory.

### **Making a Complaint**

#### **Raising a Complaint of Discrimination, Harassment or Victimisation**

If you feel that you have been the subject of discrimination, harassment, or victimisation, the Company will treat your concern seriously and sensitively. In such circumstances, you should adhere to the following procedure:

## **Informal Resolution**

1. You should in the first instance address your concern to the person you believe is discriminating against, harassing or victimising you. Tell him or her; in writing or verbally, that you find his or her conduct unacceptable.
2. If you feel unable to approach the person directly (as outlined in point one above) or, having attempted to address the issue with the person concerned, there has been no change in their behaviour or conduct; you should contact your line manager. If you feel uncomfortable raising the matter with your line manager then you should contact their line manager or the HR department.

If the matter cannot be dealt with informally to your satisfaction, you can raise a formal complaint following the procedure below:-

## **Formal Resolution**

1. You may make a formal complaint in writing to your line manager, or if you feel uncomfortable doing this, you should put it in writing to the HR department. Your complaint should set out the following details:
  - The name of the person about whom you are complaining;
  - The nature of the conduct/inappropriate behaviour;
  - Date and time of when the incident/s occurred;
  - Name/s of any witness/es to the incident/s and;
  - Any action already taken by you to stop the inappropriate behaviour.
2. A meeting will be arranged within seven days, wherever possible, of receiving the complaint to discuss your complaint and how it should be dealt with. You may be accompanied to the meeting by a MiCiM employee or trade union representative.
3. Any contact made with your line manager, or the HR department if applicable, will be treated in confidence in the first instance. Subject to you then giving your consent for the matter to be disclosed to relevant individuals, a full and thorough investigation will be carried out. If you do not want to be involved or do not consent to the matter being disclosed to relevant individuals, depending on the circumstances of the matter, the Company will still have an obligation to carry out an investigation and take appropriate action, but the extent to which this can be done may be restricted.
4. You will be advised of the outcome of the investigation.
5. If it is appropriate for the employee to be subject to disciplinary proceedings you will be notified of this, although for reasons of confidentiality for the employee concerned, you will not be made aware of the outcome of the proceedings.

If the Company's Disciplinary Procedure is formally invoked against your alleged harasser, your complaints will be investigated with due consideration to your feelings and concerns. Provided you are acting in good faith and with good reason, the fact that you have made an allegation against another member of staff will not affect your position within the Company.

In certain circumstances it may be necessary for either the employee making the allegation or the person being accused to stay at home on special paid leave whilst investigations are being conducted, or the appropriate procedure followed.

If you make a complaint of harassment you will not be victimised for doing so. Should any victimisation take place, then the perpetrator will be dealt with under the Company's Disciplinary

Procedure. However, if you maliciously or falsely make a claim of victimisation or harassment, you will be subject to the Company's Disciplinary Procedure, which may result in your dismissal.

### **Raising a Complaint of Harassment by a Third Party**

If you feel that you are being harassed by someone external to the Company, for example a client or supplier, you should bring this to your line manager's immediate attention.

The Company will deal with all such allegations seriously and take reasonable steps to prevent it from occurring again.

### **If you Observe Harassment**

The Company believes that every employee should take responsibility for ensuring that other employees are not subjected to harassment. If you are aware of the possibility that another employee may be a victim of harassment either by a fellow employee, suppliers, clients or contractor, then you should notify your line manager immediately. Your allegations will be treated sensitively and provided you have acted in good faith and with good reason then your position with the Company will not be affected in any way.

Employees in supervisory positions have a responsibility for managing other employees and in doing so must exercise particular care in performing their role. They must ensure that this responsibility is not abused by actual or apparent harassment or discrimination of any employee under their control. Managers may not instruct a member of staff, or bring pressure to bear on them, to discriminate against, victimise or harass another individual. Nor may they suppress any complaint of victimisation or harassment. The Company will regard any such conduct as gross

A handwritten signature in black ink, appearing to read 'K. Haynes', enclosed in a hand-drawn oval.

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**Kerry Haynes**

**HR Manager**

**MiCiM Ltd**

**Date: 5th October 2022**