



P06 - EQUAL OPPORTUNITIES POLICY

Howarth Litchfield is committed to a comprehensive policy of equal opportunities in employment in which individuals are selected and treated on the basis of their relevant merits and abilities without regard to race, (including colour, nationality, ethnic or national origin), religion or religious belief, sex, marital status, gender reassignment, sexual orientation, trade union membership, pregnancy and maternity, age or disability, and are given equal opportunities within the company. No employee or applicant for employment will be discriminated against or disadvantaged by any condition or requirement that is not justified by the genuine needs of the job or the organisation. We recognise the nine protected characteristics of the Equality Act 2010 and apply the provisions of the Act in full in all areas of our organisation. . This policy is relevant to all areas of employment, but in particular in relation to:

- Recruitment and selection processes, practices and procedures within the Company
- Job descriptions and job specifications in all areas
- Training and career development opportunities available to all employees
- Terms and conditions of employment for all employees
- Access to employee benefits and facilities
- Application of all policies and procedures including grievance, disciplinary and redundancy policies or procedures

The policy and practice of the company require that all employees are afforded equal opportunities within employment and that entry into employment with the company and progression within employment will be determined only by personal merit and the application of criteria which are related to the duties of each particular position. In all cases, ability to perform the job will be the primary consideration.

All employees have a duty to co-operate to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Employees must not harass or intimidate other employees on the grounds of race or sex, disabilities or sexual orientation and must not victimise or retaliate against employees who make such allegations. Disciplinary action will be taken against any employee who breached this policy and serious breaches will be treated as gross misconduct.

CODE OF PRACTICE

The company welcomes diversity amongst its employees and seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job with regard to experience and qualifications. As an employer committed to the principle of equality of opportunity, the company will adhere to the following.

Selection Criteria

The selection process will be carried out consistently for all jobs at all levels. Selection criteria for all positions will be clearly defined and reflected in the particulars sent to applicants. Job qualifications or requirements which would have the effect of inhibiting applications from members of particular groups, such as those of one sex, persons of a particular marital status or sexual orientation, persons of a particular racial group, or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done.



Advertising

Job advertisements will be appropriately publicised so as to encourage applications from suitably qualified and experienced people. In order to attract applications from all sections of the community, the company will endeavour to ensure that advertisements are not restricted to areas or publications which would exclude or disproportionately reduce applications from a particular gender or racial group, and should avoid prescribing requirements as to marital status or requirements which would exclude a particular gender or racial group.

Promotion

When considering candidates for promotion all suitable candidates will be considered regardless of race or sex, where general ability and experience are the main requirements.

Selection Methods

The selection process will be carried out consistently for all jobs at all levels. All those handling applications and conducting interviews must be aware of the principles of the Sex Discrimination Act, The Race Relations Act, the Disability Discrimination Act, and other relevant legislation. The selection of new employees will be based on job requirements and the individual's suitability and ability to do the job, and information sought from candidates will relate only to the qualifications for or requirements of the job.

Interviews

The staff responsible for short listing, interviewing and making or recommending an appointment will be clearly informed of the selection criteria. Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria. No questions will be based on assumptions about roles in the home and the family, or the assumed suitability of different ethnic groups for the post in question. Where it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves irregular hours or extensive travel) this will be discussed objectively and will be asked equally of all candidates. In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) will be offered to enable candidates to compete on equal basis.

Grievance procedures

All allegations of sex or racial discrimination or discrimination on the grounds of disability or sexual orientation will be dealt with seriously and confidentially in line with the relevant procedure.

Record keeping

Details of candidates and of selection decisions (including the rationale for selection or rejection) will be kept for at least six months after an appointment has been made, in case they are required as evidence by an employment tribunal or for other proceedings. The company will keep records of the sex, ethnicity and any disability of its employees and of all candidates and of those shortlisted and appointed. Records may be used to determine whether members of one sex or persons of a certain racial group or those with a disability do not apply for employment, or apply in smaller numbers than might be expected, or are shortlisted or appointed in a lower proportion than their application rate, or are concentrated in certain jobs. The company will investigate the practicalities of monitoring progression within employment, including access to training and development, promotion and grading.

We view this policy as an important issue as it covers all of our employees and workers, regardless of position or status, and also applies to contractors and sub-contractors.

It is the responsibility of all employees and workers to ensure its observance. Any breaches of this policy will be treated extremely seriously by the Company. Conduct by employees and workers during the course of



their employment that constitutes discrimination on the above grounds, will be considered to be gross misconduct and will lead to dismissal.

We will review this policy on a regular basis and will implement changes where necessary to improve equality of opportunity. This commitment applies to all our employment policies and procedures, across our organisation, not just those specifically connected with equal opportunities.

To achieve these aims, the Company intends to take steps to ensure that the principles of this policy dictate our strategy and all policies and procedures are regularly monitored and reviewed.

We will monitor diversity at every stage of employment to minimise the risk of any direct or indirect discrimination. We will challenge and investigate discriminatory behaviour and enforce the disciplinary procedure, when this is considered necessary.

Our intention is to communicate and regularly review the positive initiatives that have been implemented. The Company intends to support and uphold the communities in which we live and work to ensure that we are involved and to ensure that the Company keeps abreast of the necessary issues and best practice.

Complaints

Complaints will be dealt with in accordance with HL's Complaints Policy.

Signed

on behalf of Howarth Litchfield

Issue Date: 1st March 2026

Review Date: 1st March 2027

Drafted by EB / Checked by JY

Rev3