**Carbon Gold Ltd**
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## Equal Opportunities Policy Statement

Carbon Gold Ltd ("the Company") is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in the means by which they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

Any and all personal data used in connection with this Policy shall be collected, held, and processed in accordance with the Company's [Employee] Data Protection Policy.

## Objectives of this Policy

To prevent, reduce and stop all forms of unlawful discrimination in line with the Equality Act 2010.

To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are determined on the basis of capability, qualifications, experience, skills and productivity.

## Designated Officer

| | |
|---|---|
| **Name:** | Michael Hartshorn |
| **Position:** | Managing Director |
| **Telephone Number** | 07947 901230 |

## Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. Discrimination may be direct or indirect and includes discrimination by perception and association.

## Types of Discrimination

### Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

### Indirect Discrimination

This is the application of a policy, criterion, or practice which the employer applies to all employees, but which is such that:

- It is it detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents.
- The employer cannot justify the need for the application of the policy on a neutral basis.
- The person to whom the employer is applying it suffers detriment from the application of the policy.

Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.

### Harassment

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

### Victimisation

This occurs when a person is treated less favourably because they have bought or intend to bring proceedings, or they have given or intend to give evidence.

## Unlawful Reasons for Discrimination

### Sex

It is not permissible to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination.

Example: Asking a woman during an interview if she is planning to have any (more) children constitutes discrimination on the ground of gender.

### Age

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of redundancy payments.

**Disability**

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.

**Race**

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality, or their ethnic origin.

**Sexual Orientation**

It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, heterosexual, or bisexual.

**Religion or Belief**

It is not permissible to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief.

**Positive Action in Recruitment**

Under the Equality Act 2010, positive action in recruitment and promotion applies as of 6 April 2011. 'Positive action' means the steps that the Company can take to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within the Company.

If the Company chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

**Reasonable Adjustments**

The Company has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Making adjustments to premises.
- Re-allocating some or all of a disabled employee's duties.
- Transferring a disabled employee to a role better suited to their disability.
- Relocating a disabled employee to a more suitable office.
- Giving a disabled employee time off work for medical treatment or rehabilitation.
- Providing training or mentoring for a disabled employee.
- Supplying or modifying equipment, instruction, and training manuals for disabled employees.
- Any other adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.

If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact the Designated Officer.

**Responsibility for the Implementation of this Policy**

All employees, subcontractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination, harassment, or victimisation on the grounds of their race, sex, pregnancy, or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

The co-operation of all employees is essential for the success of this Policy. Senior employees are expected to follow this Policy and to try to ensure that all employees, subcontractors, and agents do the same.

Employees may be held independently and individually liable for their discriminatory acts by the Company and in some circumstances an Employment Tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.

The Company takes responsibility for achieving the objectives of this Policy, and endeavours to ensure compliance with relevant Legislation and Codes of Practice.

**Acting on Discriminatory Behaviour**

In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the Managing Director or another member of the senior management team.

**Advice and Support on Discrimination**

Employees may contact their employee or trade union representative if access to such an individual is possible.

Other contacts include:

**Equality and Human Rights Commission**

*Manchester*

Arndale House

The Arndale Centre

Manchester

M4 3AQ

*London*

Fleetbank House

2-6 Salisbury Square

London

EC4Y 8JX

(April 2021)

*Cardiff*

Block 1, Spur D, Government Buildings

St Agnes Road

Gabalfa

Cardiff

CF14 4YJ

*Glasgow*

151 West George Street

Glasgow

G2 2JJ

*Helpline Telephone Number:*

Phone: 0808 800 0082

Textphone: 0808 800 0084

Website: www.equalityhumanrights.com

**Citizens Advice Bureau**

3rd Floor North

200 Aldersgate Street

London

EC1A 4HD

Website: www.citizensadvice.org.uk

**Community Legal Services Direct**

Telephone: 0845 345 4 345

Website: www.clsdirect.uk

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**The Extent of the Policy**

The Company seeks to apply this Policy in the recruitment, selection, training, appraisal, development, and promotion of all employees. The Company offers goods and services in a fashion that complies with the spirit of this 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.

Approved.....

Name & Position M. HARTSHORN (MANAGING DIRECTOR)

Dated 8.6.21

(April 2021)