



**ABL 1Touch
Equality and diversity policy**

(includes previous Equal Opportunities Policy and is to be read in conjunction the Equal Opportunities statement)

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1 Introduction

This document sets out our policy on equality and diversity.

ABL 1Touch (hereinafter the Company) has introduced this policy as confirmation of the commitment to ensuring equality and diversity and to the prevention of discrimination.

We are particularly concerned that equality and diversity is maintained in the following areas:

- in the workplace,
- when providing services to clients,
- in our dealings with third parties.

This policy also explains how the Company will handle complaints, the potential consequences of noncompliance, monitoring procedures and training.

This policy does not form part of any employee's contract of employment. We may amend it at any time and decide to follow a different procedure where it is considered appropriate.

If you are in any doubt or have any concerns about the application of this policy in any particular instance or situation, please consult the Head of HR as soon as possible.

2 Statement of principle

The Company's statement of principle on equality and diversity is:

The Company is committed to a policy of treating all its employees, workers, and job applicants equally. No employee or potential employee will receive less favourable treatment because of any "protected characteristic", namely:

- Age (or perceived age),
- Disability (past or present),
- Gender reassignment,
- Marriage or civil partnership status,
- Race, colour, nationality or ethnic or national origins,
- Religion or belief,
- Sex,
- Sexual orientation

No employee or potential employee will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

The Company is committed to promoting, valuing, and managing diversity and ensuring equality for all employees.



These principles of equality and diversity also apply to the manner in which we treat clients, our business partners and visitors.

Employees are expected to work with the Company towards these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

An equality policy statement will be sent to all employees and displayed on the Company's intranet. A copy of this policy is available under the Company Documents section of our HR System.

Other company policies, such as those dealing with harassment and bullying, maternity, paternity, adoption, emergency time off for dependents and parental leave are set out in separate documents, copies of which are available from under the Company Documents section of our HR System.

3 Application of this policy

The principles set out in this policy apply:

in the workplace,

outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events.

4 Who is responsible for equality and diversity?

All persons associated with the Company are responsible for promoting equality and diversity.

The Company is committed to attaining effective equality and diversity and will ensure adequate resources are available to meet equality and diversity needs.

The Head of HR is responsible for:

- devising and developing this equality and diversity policy,
- monitoring and reviewing the Company's equality and diversity arrangements,
- building a culture of equality and diversity awareness through training and education,
- providing assistance to individuals and/or teams who have responsibility for specific equality and diversity actions,
- reporting regularly to the Company on equality and diversity issues.



Special responsibility for the practical application of the Company's equality policy falls on managers and supervisors involved in the recruitment, selection, appraisal, promotion, supervision and training of employees as well as the way their terms of employment are fixed.

Every employee is personally accountable for the implementation of the company's equality policy, which includes the treatment of job applicants, employees (including former employees), clients, and visitors. This is described in greater detail below.

5 Discrimination, victimisation, and harassment

There should be no discrimination, whether direct or indirect, based on any of the protected characteristics listed in the Company's Statement of principle on equality and diversity (see above).

The types of discrimination that are prohibited are:

- direct discrimination,
- indirect discrimination,
- victimisation,
- harassment.

Direct discrimination is the unfavourable treatment of an individual based on a protected characteristic. An example of this is paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and includes less favourable treatment based on a perception of another person, for example that the person is homosexual, or is disabled, whether or not this perception is correct and even if the perpetrator knows that his perception is, in fact, wrong. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic.

Indirect discrimination is treating people in the same way but in a way that adversely affects those with a protected characteristic. An example of this is telling all employees that they must work late at night—although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women.

Victimisation is treating someone less favourably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this is an employee claiming they had been discriminated against on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.

Harassment is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and,



because of that rejection or submission, that person treats the victim less favourably. More information on what can constitute harassment is set out in the Company's Anti- Harassment and Bullying policy.

6 Equality and diversity in the workplace

We will appoint, train, develop, reward, and promote based on merit and ability.

6.1 Recruitment and selection

The following principles will apply whenever recruitment or selection for positions takes place, whether externally or internally:

- Individuals will be evaluated based on their personal capacity to perform a specified task,
- Assumptions that only certain types of people will be able to perform certain types of work must not be made,
- Any qualifications or requirements applied to a job which have or may have the effect of inhibiting applications from certain types of people will be retained only if they can be justified in terms of the job to be done,
- Any age limits applied to a job will be retained only if they can be objectively justified in terms of the job to be done—in most cases this will not be the case and managers should consult the Head Of HR if considering an age limit for a particular post,
- Individuals will be evaluated based on their personal capacity to perform a specified task,
- Selection tests will be directly related to job requirements and will assess a candidate's actual or innate ability to perform the job or educate for it,
- Selection tests will be reviewed on a regular basis to ensure their continued relevance and absence of unjustifiable bias in content or scoring mechanism,
- Applications from different types of people will be processed in the same way and the same questions asked at the interview,
- Written records of interviews and reasons for appointment and non-appointment will be kept,
- Interview questions will be relevant to the job requirements,
- Where any provision, criterion or practice for recruitment and selection puts disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments will be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. This could, for example, be



making different interview arrangements for an applicant with mobility problems or arranging for facilities for applicants with sight or hearing impairments,

- Decisions regarding the method of recruitment or selection or who is recruited or selected will be made only by a person who has read and understood this.

6.2 Promotion, transfer and training

The following principles will apply to appointments for promotion, transfer, and training:

- Assessment criteria and appraisal schemes will be carefully examined to ensure they are not discriminatory, whether directly or indirectly,
- Assessment criteria and appraisal schemes will be monitored on a regular basis and, where such criteria or schemes result in predominantly one group of workers gaining access to promotion, transfer or training or being awarded a particular appraisal grade, they will be checked to make sure this is not due to any hidden or indirect discrimination,
- Promotion and career development patterns will be monitored on a regular basis to ensure that access to promotion, training and career development opportunities is not denied to specific groups or types of employees,
- Traditional qualifications and requirements for promotion, transfer, and training, such as duration of service, years of experience or age may discriminate against certain workers and will need to be objectively justified by reference to the job requirement,
- Where any provision, criterion or practise relating to promotion, appraisal, transfer, or training places disabled workers at a substantial disadvantage for because of their disability, reasonable adjustments will be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. For example, this could be making training available for a disabled worker in a different way, in a different location or at a different time. The employees are asked to notify their line manager or HR of any specific requirements so that adequate and reasonable adjustments can be made.

6.3 Terms of employment, benefits, facilities, and services

The following principles apply to terms of employment, benefits, facilities, and services:

- The terms of employment, benefits, facilities, and services available to the employees will be reviewed regularly to ensure that they are provided without unlawful discrimination,



- Part-time workers will receive pay, benefits, facilities, and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified. Managers who are responsible for part-time workers should, in particular, take advice from the HR team when assessing pay (including any bonuses) and benefits for part-time workers,
- Where any provision, criterion or practice relating to terms of employment, benefits, facilities, and services puts disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments will be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage. Managers who are responsible for part-time workers should, in particular, take advice from the HR team when assessing pay (including any bonuses) and benefits for disabled workers.

6.4 Grievances, disciplinary procedures, dismissals, and redundancies

Employees who, in good faith, bring a grievance (or assist another in doing so) either under this policy or otherwise in relation to an equality and diversity matter will not be disciplined or dismissed or otherwise suffer any adverse treatment for having done so.

No member of a particular group of employees will be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group unless there is valid and lawful justification for the differential treatment.

Redundancy criteria and procedures will be thoroughly examined to ensure they are not applied and do not operate in an unlawfully discriminatory manner.

7 Complaints procedure

The Company's Grievance procedure is available to any employee who believes that they may have been subjected to unjust discrimination. The Grievance procedure can be found under the Company Documents section on the HR System. The harassment complaints procedure set out in our bullying Anti-Harassment and Bullying policy is also available in the same place. Complaints will be dealt with promptly, fairly, openly, effectively, seriously, and in confidence.

8 Equality and diversity in our relations with clients

Any reference in this policy to clients includes current, past, and potential clients.

The Company will treat our clients fairly and equally at all times.

The Company will not unlawfully discriminate against our clients.



The Company is generally free to decide whether to accept instructions from any particular client. Where it is decided not to accept instructions, this will not be based on any protected characteristics.

The Company will take steps to ensure that the diverse needs of our clients are met. Where necessary, we will devise procedures to deliver services that meet specific needs arising from clients' ethnic or cultural background, gender, religion or belief, sexual orientation, disabilities, age, or other relevant factors. The Company will do so only where this is permitted by the relevant anti-discrimination legislation.

The Company will take seriously any complaint of discrimination by or on behalf of a client and act promptly to investigate.

The Company will communicate this Equality and diversity policy to clients via our Terms of Business and our website.

9 Failure to comply

All employees must be aware of and adhere to this policy. They may be liable to disciplinary action if they fail to comply with its provisions or related policies and procedures.

Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment and bullying will be treated as gross misconduct. Unjustified allegations that are not made in good faith may also be considered a disciplinary matter.

10 Monitoring and review

The Head of HR is responsible for this policy.

The Company regularly monitors the effectiveness of this policy on regular basis to ensure its implementation and we will review and update this policy as and when necessary, at least annually.

The Company's monitoring will conduct ongoing reviews and analysis in the following areas:

- recruitment and promotion,
- pay and remuneration,
- training,
- appraisals,
- grievances,
- disciplinary action,



- dismissals and other reasons for leaving,
- any client complaints,
- our lists of approved counsel, experts, and suppliers.

The Company also collects data each year about the diversity of the workforce. We do this for several reasons:

- it is good practice to monitor the diversity of the Company's employees, in terms of age, gender, sexual orientation, ethnicity, and disability,
- The Company is interested in your opinions as to whether we can do more to build an inclusive culture that works for everybody—this helps us make sure activities and future plans represent the interests of everyone in the company.

The procedure for collecting, reporting, and publishing the diversity data may vary from time to time and the Company will notify the employees of the relevant procedure at the start of each annual data collection exercise.

As part of the Company's monitoring programme, equality and diversity information may be recorded about employees and directors on the basis of age, gender, ethnicity, and disability.

The Company may also monitor the sexual orientation, religion, or beliefs of the employees and directors. The Company will do so only where this will not cause offence or discomfort to staff and directors.

The Company will store equality and diversity data about staff and directors as confidential sensitive personal data. This data will be used exclusively for the purpose of monitoring equality and diversity. The Company will restrict access to this data.

The Company will take action if our monitoring reveals:

- breaches of this policy, or
- barriers to equal opportunities

The Company will review this policy regularly—at least annually. We will provide information and/or training on any changes we make.

11 Training

The Company will ensure that all managers and supervisors with responsibility for managing employees, supervising client matters and dealing with third parties are provided with the appropriate equality and diversity training.

All employees will receive appropriate training on the Company's equality and diversity policy including:

- regular training for existing employees,



- training for new employees at induction,
- updates following any changes to the policy that affect employees.

12 Policy Review

This Policy will be reviewed annually to ensure that it continues to meet the Company's objectives and regulatory requirements. Any changes to the Policy will be approved by the Board of Directors.

13 Policy Queries

Any queries relating to this policy should be directed to the Head of HR at ABL_HR@Abl1touch.com

14 Policy Approval and Endorsement

This policy has been approved and endorsed by the Board of Directors and the Management. We believe that by adhering to these guidelines, we will make meaningful contributions to societal and environmental well-being.

This Policy supersedes all previous equality and diversity policies.

Formalised and approved by the board of directors on 17th April 2024

Date issued	Version number	Date reviewed	Approved
17 th April 2024	V1.2024	n/a	Board of Directors