EQUAL OPPORTUNITIES POLICY

Introduction

Spoken Ink Ltd's Equal Opportunities Policy is applicable to all employees, workers and contractors. Spoken Ink Ltd is committed to a policy of equal opportunity and non-discrimination, and will not tolerate action or behaviour that is contrary to this policy.

Breaches of Spoken Ink Ltd's Equal Opportunities Policy by employees will be dealt with through the disciplinary procedure and may be considered to be gross misconduct. Breaches by workers or contractors may be grounds for Spoken Ink Ltd to withdraw work or terminate contracts for services or similar.

This document sets out Spoken Ink Ltd's policy and objectives with regard to equality of opportunity. A complaints procedure has also been included to allow any employee, worker or contractor to raise concerns about discrimination or harassment, in order that any such complaint may be addressed quickly and appropriately.

Policy Statement

At all times, Spoken Ink Ltd aims to:

- Select, recruit, develop and promote the very best people, basing judgement solely on suitability for the job.
- Ensure all applicants and employees receive fair and equal treatment irrespective of sex, marital status, nationality, colour, race, age, national origin, religion, belief, sexual orientation or disability.
- Ensure all employees receive fair and equal treatment irrespective of whether they work part-time or are engaged on a fixed term contract.
- Maintain a working environment free from harassment and intimidation.
- Ensure that existing and new legislative Acts based on statutory rights to equal treatment are adhered to.
- Deal speedily and effectively with any complaints of alleged discrimination and/or harassment, ensuring all complaints are fully investigated and that remedial action is taken where necessary.

Legislation

The legislation covering this area is The Equality Act 2010. This covers the following areas of equality: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity. These are called **'protected characteristics.'**

This policy also covers the part-time workers (Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000) and fixed term workers regulations (Fixed Term Employees Regulations (Prevention of Less Favourable Treatment) Regulations 2002).

Definitions

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

It can also be when an individual is treated less favourably because they are part-time or employed on a fixed term contract.

Associative discrimination

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

Perceptive discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that protected characteristic.

Examples of direct discrimination would be:

- where a part-time employee is paid a lower rate of pay (on a pro-rata hourly basis) than a full time employee carrying out the same job. **Or**
- where a female employee is not given the opportunity to apply for promotion, but male colleagues are.

Indirect discrimination is where a **condition, rule, policy or even a practice** is applied to everyone that particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if it can be shown that the condition, rule, policy or practice was reasonable in managing the business.

Examples of indirect discrimination may include:

- seeking job applications only from people under 30 years old (this may amount to age discrimination) (i.e. a condition that you have to be under 30); **Or**
- Not providing a part-time employee with the same access to training – stating that an employee has to work full-time to receive training (i.e. the requirement is to be full-time).

What is Harassment?

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual".

You can also raise a complaint of behaviour that you find offensive even if it is not directed at you.

Harassment may involve repeated forms of unwanted and unwarranted behaviour, but a one-off incident can also amount to harassment.

Harassment on any of the relevant **'protected characteristics'** may amount to unlawful discrimination. Harassment may also breach other legislation and may in some circumstances be a criminal offence e.g. under the provisions of the Protection from Harassment Act 1997.

Reasonable and proper management instructions administered in a fair and proper way, or reasonable and proper reviews of an employee's performance will not constitute harassment. Behaviour will not amount to harassment if the conduct complained of could not reasonably be perceived as offensive.

Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Discrimination or Harassment Procedure

If you believe you are the subject of discrimination, harassment or victimisation, you should bring this to the attention of Spoken Ink Ltd as soon as possible. You can raise any matters formally or informally. In either case, it will be dealt with promptly.

Informally

Informally, you may either speak to your Team Lead or ask a colleague to speak in confidence on your behalf. They will offer advice and may investigate further. If the complaint is against your Team Lead you may speak to another Team Lead or senior person in Spoken Ink Ltd.

In addition you may wish to make it clear to the person whom you are complaining about that their behaviour or actions are unacceptable to you and must stop. You may do this by speaking to the person or alternatively you may wish to put this in writing to the person.

Formally

The formal procedure may be used either where informal methods have failed, or where an employee feels it is more appropriate to use a more formal procedure. In such cases employees should use the formal grievance procedure and should put their concerns in writing and where possible provide the following information:

- The name of the person or persons whom the complaint is being made against.
- The nature of the complaint (what has happened).
- Dates and times when alleged incidents occurred.
- Names of any witnesses.
- Any action taken to stop the behaviour.

Whenever a complaint is raised Spoken Ink Ltd will immediately take such action that is felt appropriate in the circumstances to investigate the matter thoroughly and to reassure the employee.

Witnessing behaviour or actions that may be discriminatory or harassing

If you witness behaviour that you believe is of a discriminative nature or is harassing an employee or others you should report this to Spoken Ink Ltd. Initially you should speak to your Team Lead or, if this is not possible, to any other senior person in Spoken Ink Ltd. You may be asked to give a statement about what you witnessed, but Spoken Ink Ltd would, as far as is practicable, maintain your anonymity. Spoken Ink Ltd would seek to investigate any situation that was reported, promptly and thoroughly.

Employees, workers, and contractors are assured that allegations of discrimination or harassment will be dealt with quickly and taken seriously. Under no circumstances should it be feared that an employee would be victimised for making or being involved in a complaint. Victimisation of a complainant is in itself a disciplinary offence.

Signed on behalf of Spoken Ink Ltd:



Position: CEO Date: 03 January 2026