

Purpose

Aptus Utilities is committed to achieving a working environment, which provides equality of employment to all existing and potential employees/workers, regardless of service, hours, status or permanency. The Company is committed to respecting Human Rights and believes that diversity adds value to its business. A diverse workforce which reflects the local community in both cultural and different life experiences will enhance the potential for creativity, vitality and innovation within the Company.

It is the Company's policy to treat all employees/workers, job applicants, members of the public and recipients of services fairly and equally, and that means treating everyone as individuals regardless of their age, gender, transgender, race, disabilities, sexual orientation, marital status, religion or belief or whether pregnant or not.

This policy applies at all times and ensures that everyone in our organisation has a pleasant working environment and is treated with an equal amount of respect. It also applies to employees when interacting with the public and when representing Aptus Utilities to third parties.

Selection for employment, promotion, training or entitlements to any company benefit will be based on aptitude and ability. All employees should have equal access and opportunity to develop their full potential, and the resources of our diverse workforce will be used to maximise the efficiency of our organisation.

The Company opposes all forms of unlawful and unfair discrimination and will not tolerate any processes, attitude or behaviour that may amount to discrimination, including harassment, victimisation and bullying.

The policy impacts on all areas of the business including: terms of employment, benefits recruitment, career development, training, discipline, redundancy and dismissal .

Scope

This Policy applies to all employees, visitors, employees of other organisations seconded to or working with Aptus Utilities, subcontractors, suppliers and persons applying for employment.

Definitions & Responsibilities

Definition

Discrimination may occur in many forms. These can be defined as follows:

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 (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

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

Perception 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 characteristic.

Indirect discrimination – Indirect discrimination can occur when there is a condition, rule, policy or even a practice in the company that applies to everyone but particularly disadvantages people who share a protected characteristic.

Harassment – can be defined as any behaviour, whether deliberate or otherwise, directed at an individual, which is found to be offensive or objectionable to the recipient or creates an intimidating or threatening environment.

Victimisation – occurs if an individual is treated less favourably than others as a result of exercising their rights under this policy or as a result of a protected characteristic.

Responsibilities

The Board has the primary legal and moral responsibility for ensuring that discrimination does not occur and that there is an effective policy in place which is regularly monitored. The Board is liable (together with its employees) for any acts of unlawful discrimination by their employees, or third parties, even when such acts are carried out without the Board's knowledge or approval.

The responsibility for implementing and monitoring the policy rests with HR. Records will be monitored and analysed and the Company's procedures will be regularly reviewed to form the basis for appropriate action to eliminate unlawful discrimination and to promote equality of opportunity. Should such monitoring reveal any areas of concern, these will be investigated, and the necessary action taken in line with this policy. Implementation within individual business units lies with the directors and managers, who also have the responsibility for communicating the policy to potential and existing employees.

All employees have certain responsibilities under this policy. Good employee relations and fair employment practices depend on employees as much as on the management and directors. Employee attitudes and activities are of great importance.

Employees have a duty to the Company and fellow employees and the Company regards direct or indirect discrimination on the grounds of any protected characteristics (Age, Disability, Gender Assignment, Race, Religion or Belief, Sex, Sexual Orientation, Marriage and Civil Partnership and Pregnancy and Maternity). Employees who display unacceptable behaviour will be subject to Aptus Utilities Disciplinary procedure. These acts will be deemed to constitute gross misconduct and may result in summary dismissal.

Procedure***Unfair treatment***

Should any employee/worker of Aptus Utilities feel that he or she is being treated unfairly, he or she should raise a grievance through the Company's grievance procedure. If the individual feels it is inappropriate to approach his or her manager, he or she should raise their grievance with HR.

Training

All Aptus Utilities employees/workers have a personal responsibility for their involvement in the practical application of this policy.

Aptus Utilities undertakes to provide the appropriate advice and guidance to ensure that employees/workers actions comply with the policy and an explanation of the policy will be included in the Employee Induction Programme.

Appropriate support will be provided to enable employees to perform their jobs effectively and efficiently and to pursue career development opportunities. Every employee will have equal access to training and learning and development opportunities and no-one is excluded. The development provided will reflect the individual's personal needs and the needs of the organisation and will be identified through the appraisal process. The Company will ensure that training resources and training places are allocated within an equal opportunities framework.

All training and learning and development opportunities will be notified to employees as they arise through the normal communication channels.

Employment

Aptus Utilities will aim to:

- a. Provide full and fair consideration to all job applicants.
- b. Maintain records in recruitment, training and employment and use this information as a means of identifying and remedying any areas of inequality.
- c. Regularly review all its recruitment, selection and promotion procedures to ensure that they are fair and reflect current best practice.
- d. Assist employees/workers to realise their full potential by ensuring that they receive fair consideration of their training, career development and promotion opportunities.
- e. Ensure that it has access to the widest appropriate labour market and secures the employee best suited to its business needs.

- f. Ensure that no applicant or employee receives less favourable treatment on unfair grounds.
- g. Ensure wherever possible employees/workers are given help to attain their full potential to the benefit of the Company and the individual.

Aptus Utilities is working towards achieving an ability-based workforce, which is in line with the working population mix in the relevant labour market areas.

Promotion

Aptus Utilities will aim to ensure that the same principles as for employment are applied to those employees' seeking promotion.

Every employee will have equal access to promotional opportunities and no-one is excluded.

All vacancies are advertised internally, which is communicated and advertised on our Company website and are open to all applicants.

Race

Aptus Utilities undertakes to:

- Strive for racial equality in employment and service provision and to promote good relations between all racial groups and organisations.
- Will work with other agencies and the community to promote racial equality and eliminate racial disadvantage and racial harassment.
- Will encourage people from minority communities to take up employment and training opportunities in areas where they are underrepresented.

Religion

Aptus Utilities will strive to:

- Create an environment, which recognises and respects religion or belief.
- Develop employment practices and services in ways, which recognise and respect these beliefs.
- Will follow government guidance on applying the relevant UK legislation.
- Promote greater awareness of the need for understanding and tolerance of the differences in religious or belief.

Disability

Aptus Utilities recognises its responsibilities under the Equality Act 2010 and other relevant legislation and will follow the appropriate Code of Practice for Employment and Premises.

The Company will, whenever possible modify its procedures or equipment to make full use of an employee's ability and adapt its facilities as is reasonably practicable to accommodate their requirements.

Where needed, managers and staff will be trained in awareness and confidence to support people with a disability.

The Company will continue to employ, whenever practicable, employees who become disabled during their employment and assist in their retraining.

Sexual Orientation

Aptus Utilities recognises the discrimination that people face in their lives due to their sexual orientation and life choices and are committed to working to remove this unfair treatment.

The Company will work to ensure that its employment policies and service deliveries are not based on the assumption that everyone is heterosexual and will work towards the equal application of all terms and conditions of employment irrespective of any employee's sexual orientation.

Age

Aptus Utilities will actively encourage a diverse group of people irrespective of their age into the industry by providing suitable training and development opportunities which will lead to sustainable careers for our workforce.

Gender

Aptus Utilities recognises that ability and talent have no gender and will strive to ensure equality of opportunity for all regardless of their gender. The Company will treat all employees fairly and equally in regard to employment, pay, training and promotion, and where possible will consider requests for flexible working to ensure that no detriment is suffered to those with childcare responsibilities.

Transgender Employees/ Gender Reassignment

If you inform us of any changes in your personal circumstances and/or intention to transition, we will discuss any support that may be required and adjustments that we could make to ensure that you are supported both during and after transition.

Your employee records will be updated upon request from yourself though we may need a legal name change for certain records (payroll, pension, etc.).

We will discuss with you how this should be disclosed to colleagues and clients.

Names/Pronouns

Employees will be addressed by the name and pronoun that they choose.

Quality Records

The management of documents and records is defined in the Document and Data Management procedure.

Reviews

This policy is to be reviewed by the policy owner at least every 12 months.

Approved: Andy Halsall – Chief Executive Officer

Date: June 2025

For and on behalf of Aptus Utilities Ltd

Next Review: June 2026

