

Equality, Diversity and Inclusion Policy

June 2023

1. Scope and Introduction

This policy applies to anyone working for us. This includes employees, workers, contractors, agency workers, volunteers and interns. The policy also relates to job applicants, and is relevant to all stages of the employment.

The policy has been implemented following consultation with the Staff Consultative and Diversity and Inclusion Committees.

This policy and the procedures described in this document do not form part of any employee's contract of employment and may be amended at any time.

This policy will be reviewed at least once in every 3 years.

OPM is a global company and is committed to understanding and following the local laws of the countries within which we operate. Where we need to provide supplementary country information to support this, we will publish local annexations.

2. Purpose

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. And we value our people for the differences they bring to the table. These differences - this diversity - is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working environment for us all.

To support this inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of our people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

3. Personnel Responsible

The HR Director has the overall accountability for the effective operation of this policy including ensuring compliance with any relevant legislation, its maintenance and review.

Line managers have the day-to-day responsibility for the effective operation of this policy.

HR Business Partners are responsible for providing support to ensure the effective operation of this policy. The HRBP may delegate their role in this process to another competent member of the HR Team or an external consultant.

The Learning and Development Manager is responsible for providing support to ensure the effective operation of this policy in the area of learning and development.

The Recruitment Team is responsible for providing support to ensure the effective operation of this policy in the area of recruitment.

Both the Diversity and Inclusion Committee and the Staff Consultative Committee enable OPM management to hear and learn from the voices of employees.

All workers are responsible for ensuring their own compliance with the Policy.

4. Equal opportunities statement

OPM is committed to providing an inclusive workplace offering equal opportunities to all of our workers. We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of innate characteristics which do not impact their abilities or competence. Key innate characteristics include:

- disability;
- sex, gender, gender identity or gender reassignment status;
- marital status;
- race, racial group, ethnic, regional or national origin, colour or nationality;
- religion or belief;
- sexual orientation;
- age;
- marital or civil partnership status;
- pregnancy or maternity;
- paternity;
- caste or socio-economic background.

5. What we expect from you

We expect you, and everyone covered by this Policy to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded. In this way, for example, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also

very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and creating a welcoming space for others to contribute. We encourage you to speak up in defence of the rights of others and where appropriate for you to challenge where you are concerned that others are not acting in line with this policy. If you do not feel confident in doing this, you can raise this with your manager or a member of the HR Team. By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying as covered in our Anti-Harassment and Anti-Bullying Policy

If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure. In some jurisdictions, the courts can hold you personally liable for discrimination and harassment. If you need further information on this please speak to the Legal and Business Governance Team.

6. Preventing discrimination

As a company, we work to prevent discrimination in the workplace. This includes:

- **Direct discrimination:** Treating someone less favourably because of an Innate Characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
 - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
 - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
 - physical modifications eg providing a wheelchair ramp
 - allocating some of the disabled person's duties to a colleague;
 - changing their working hours or place of work;
 - adjusting procedures for assessing job candidates; and
 - modifying disciplinary and grievance procedures.

7. Harassment and sexual harassment

Harassment is unwanted conduct related to an Inherent Characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our Anti-harassment and Bullying Policy for further information on our procedure for reporting harassment.

8. Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

9. Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

You should refer to our [Anti-harassment and Bullying Policy](#) for further information on our procedure for reporting bullying.

10. Equality of opportunity

10.1. Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not unfairly discriminate in any way.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

10.2 Career development

Any decision you make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

Disability inclusion

10.1.1. Recruiting people with a disability

The Recruitment Team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview/adapting psychometric tests/replacing psychometric tests with an alternative option/providing an alternative to a telephone interview for a deaf candidate/providing a suitable chair for an interview with a candidate suffering from back problems.

If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from the Recruiter supporting the vacancy. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

10.1.2. Talking about disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (for those to whom it applies) under our [Disciplinary procedure](#).

10.1.3. Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.

For colleagues who are returning from long-term disability-related absence, we have a return-to-work support programme in place. For further information, please contact your line manager. HR will support the line manager with this.

10.1.4. Support

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice. Details of how to access this service are on the Global Hub.

10.3.5 Accessibility

OPM aims to ensure that our offices and systems are fully accessible to people with disabilities. If you experience accessibility issues due to your disability, for example because of aspects of our premises or because you do not have adaptive equipment to help you perform your role, please contact your line manager in the first instance.

10.2. Training and Development

All staff must attend any mandatory Equality and Diversity Training provided by the company

Furthermore, we expect all our people to proactively support the equality, diversity and inclusion initiatives which the Company will arrange from time to time, by attending these events to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

Equalities, Diversity and Inclusion Policy

Document Purpose:

OPM would like to ensure that all OPM representatives are treated, and treat others, fairly with dignity and respect. This policy:

- outlines our commitment throughout the employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

Policy Overview			
Policy Owner	Human Resources Director		
Applies to	All staff and suppliers over whom OPML has duty of care		
Global or local scope	Global		
Version Number	1	Effective from	02/06/2023
Approvals (Dates)	Board		01/06/2023
	Management Team		25/05/2023
	Other (please state)		