

## Equality and Diversity Policy CapGlobal:

HEADING	SECTION CONTENT
<p><b>Aims of this Policy</b></p>	<p>CapGlobal recognizes and values people’s differences and will assist them in using their talents to reach their full potential.</p> <p>The organization will do all it can to ensure it recruits, trains and promotes people based on qualifications, experience and abilities for all roles within the organization.</p> <p>CapGlobal provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability or genetics. In addition to federal law requirements, CapGlobal complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.</p> <p>CapGlobal expressly prohibits any form of workplace harassment based on race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. Improper interference with the ability of CapGlobals’ employees to perform their job duties may result in discipline up to and including discharge.</p> <p>Using fair and objective employment practices, the organization aims to ensure that</p> <ul style="list-style-type: none"> <li>• All employees and potential employees are treated fairly and with respect at all stages of their employment.</li> </ul>

	<ul style="list-style-type: none"> <li>• All employees have the right to be free from harassment and bullying of any description, or any other form of unwanted behaviour. Such behaviour may come from other employees or by people (third parties) who are not employees of CapGlobal, such as customers or clients.</li> <li>• All employees have an equal chance to contribute and to achieve their potential, irrespective of any defining feature that may give rise to unfair discrimination.</li> <li>• All employees have the right to be free from discrimination because they associate with another person who possesses a Protected Characteristic or because others perceive that they have a particular Protected Characteristic, even if they do not.</li> <li>• All employees have the right to be free from discrimination during job interviews and job description.</li> </ul>
<p><b>Scope of the policy</b></p>	<p>The policy applies to</p> <ul style="list-style-type: none"> <li>• Job applicants</li> <li>• Employees</li> <li>• Agency temps</li> <li>• Students on work experience or placements</li> <li>• Service users</li> </ul> <p>The policy applies to all stages of employment including recruitment and selection, promotion and training.</p> <p><b>Direct discrimination</b>  CapGlobal has zero tolerance for and prohibit any and every form of discrimination on the basis of</p> <ul style="list-style-type: none"> <li>• Race;</li> <li>• Gender;</li> <li>• Sexual orientation, or;</li> <li>• Gender identity;</li> <li>• Disability;</li> <li>• Religious belief;</li> </ul>

- Age;
- Veteran Status related to
- Employment with CapGlobal and its clients;
- Consideration for work assignments or;
- Any other work-related consideration.

People also must not be discriminated against because they are on a part time or fixed term contract

**Indirect discrimination**

This is where there is a working condition, practice or rule that disadvantages one group of people more than another. In other words it is more difficult for people from one group to comply with the requirement. Even if it is done accidentally indirect discrimination is unlawful.

**Discrimination arising from disability**

This is where a disabled person is treated unfavorably because of something connected to their disability. This only applies where the organization knew or could reasonably be expected to know that the person was disabled.

**Associative Discrimination**

This is where someone is treated worse than someone else because they are associated with someone with a protected characteristic.

**Perceptive Discrimination**

This is where someone is treated differently from someone else because there has been an incorrect assumption that they have a protected characteristic. This applies even if the person does not possess the characteristic.

	<p><b>Third Party Harassment</b>  This is where an employee is harassed by a third party who is not an employee or service users. CapGlobal becomes liable if it has happened on at least two occasions, that it is aware that it took place and have not taken steps to prevent it happening again.</p>
<b>Policy statement</b>	<p>We value the variety of different views, outlooks and approaches that a diverse workforce bring. This assists us to provide improved services and increase our understanding of our service users/clients. We will do all we can to ensure no one will receive less favourable treatment or is to be disadvantaged by requirements or conditions, which cannot be shown to be justifiable.</p>
<b>Responsibilities</b>	<p>Employees of CapGlobal have a duty to act within this policy, ensure it is followed and to draw attention to any suspected discriminatory acts or practices.</p> <p>Responsibility for promoting awareness of this policy and monitoring that it is being followed rests with CapGlobal.</p> <p><b>Breaches of the Equality and Diversity Policy by employees</b>  Breaches of this policy by employees may be dealt with your position may be jeopardised should you not follow this policy.</p> <p>Employees are also personally liable under equality legislation for any act of discrimination.</p>
<b>Equality and diversity in practice</b>	<p>In carrying out the policy, CapGlobal will carry out the following actions:</p> <ul style="list-style-type: none"> <li>• Particular attention will be placed on the following: <ul style="list-style-type: none"> <li>○ Use of selection criteria that does not discriminate in recruitment and promotion procedures</li> <li>○ Requiring entry to employment or progression within it to</li> </ul> </li> </ul>

	<p>be based on merit</p> <ul style="list-style-type: none"> <li>○ Not discriminating in opportunities for recruitment, training, promotion or transfer of employees</li> <li>○ Ensuring that every individual is assessed according to his or her personal capability to carry out a given job/role</li> <li>○ Ensure that all employees are given equal treatment with regard to terms and conditions of employment, provided they do the same or broadly similar work, or work of equal value</li> <li>○ Ensure equal opportunities and non-discrimination in the operation of grievance and disciplinary procedures</li> </ul> <ul style="list-style-type: none"> <li>● Ensure that all relevant requirements of the Civil Rights Act 1991 in relation to disability are met and adhered to. This will include making reasonable adjustments to ensure access to employment tasks and opportunities.</li> <li>● Ensure that any amendments to legislation relating to discrimination are met and adhered to.</li> </ul>
<p><b>Implementation of the policy</b></p>	<p>All staff, will be involved in creating an environment that values diversity.</p> <p><b>COMMUNICATIONS</b></p> <p>Communication of the policy to job applicants and employees through:</p> <ul style="list-style-type: none"> <li>● Making available a copy of the policy to prospective applicants</li> <li>● Ensuring all new starters have the opportunity to discuss the policy with line managers/ colleagues</li> <li>● Making use of team meetings to discuss the policy and defining areas where practice could be improved</li> <li>● Providing non- discrimination selection training for managers who are recruiting</li> <li>● Providing appropriate training and guidance to staff including reference to abiding by the policy in staff terms and conditions</li> <li>● Incorporating specific responsibilities into job/role descriptions</li> </ul>

	<p><b>WORKING WITH PARTNERS</b></p> <p>In selecting our partners we will consider their commitment to non-discrimination in the workplace by:</p> <ul style="list-style-type: none"> <li>• Asking to see their policy</li> <li>• Asking what they do in practice, including monitoring their policy</li> </ul>
<p><b>Reporting discrimination / potential discrimination</b></p>	<p>Employees who feel that they have suffered any form of discrimination should raise the issue through the following means:</p> <ul style="list-style-type: none"> <li>• Raise the topic with manager</li> <li>• Raise the issue with CapGlobal</li> </ul> <p>Employees should also use this approach if they feel that they been the subject of harassment from someone who is not an employee of CapGlobal. CapGlobal will not tolerate any harassment from third parties towards its employees and will take appropriate action to prevent it happening.</p> <p>If an employee witnesses behaviour that they find offensive in relation to age, marriage or civil partnership, pregnancy and maternity, disability, gender reassignment, race, religion or belief, sex and sexual orientation, even if it is not directed at them they should also use this procedure.</p>
<p><b>Review</b></p>	<p>This policy will be reviewed every year by CEO to ensure that it remains up to date and reflects the needs and practices of the organization.</p>