

EQUALITY, DIVERSITY AND INCLUSION POLICY

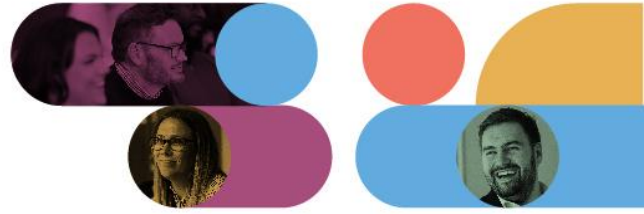
August 2022

Introduction

It is the policy of Pareto Facilities Management Limited to treat job applicants and employees in the same way regardless of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).

Code of Practice

- Pareto FM is an equal opportunity employer. Equality, diversity and inclusion is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has personal responsibility for the implementation of this policy. Any instances of doubt about the application of the policy or any other questions, should be addressed to your Line Manager, as should any request for special training.
- Pareto FM does not discriminate on the grounds of sex, sexual orientation, marital status, age, ethnic origin, colour, nationality or disability.
- The following forms of discrimination are prohibited under this policy and are unlawful:
 - Direct discrimination: treating someone less favourably because of a Protected Characteristic.
 - a. Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.
 - b. Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's

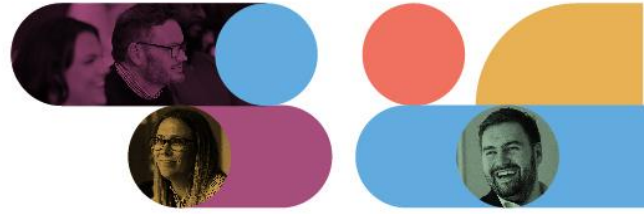


dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Dignity at Work Policy.

- c. Victimization: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- d. Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability and failure to make reasonable adjustments to alleviate the disadvantages caused by a disability.
- The policy applies to the advertisement of jobs, recruitment and appointment of them, training, appraisals, promotion, conditions of work, pay and to every other aspect of employment.
- You should note that the imposition of a condition or requirement which has an adverse impact on someone who, because of his or her sex, race or marital status is more likely to be affected by it, will also be unlawful unless it can be justified on the grounds of business need. In all such situations your Line Manager should be consulted.

Assistance for Disabled Employees

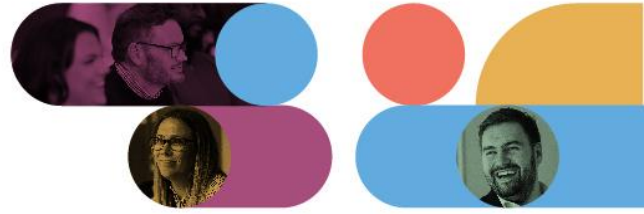
- Employees who are disabled or become disabled in the course of their employment should inform your Line Manager.
- They may also wish to advise Pareto FM of any 'reasonable adjustments' to their employment or working conditions which they consider to be necessary or which they consider would assist them in the performance of their duties. Careful consideration will be given to any proposals of this nature and, where reasonable and reasonably practicable, such adjustments will be made.



There may be circumstances where it will not be reasonable or reasonably practicable for Pareto FM to accommodate those proposals and where less favourable treatment may be justified in accordance with the Statutory Provisions.

Making a Complaint

- Pareto FM operates a grievance procedure and encourages all employees to raise any grievance relating to their employment including any breach of this Equality Diversity & Inclusion Policy in accordance with the grievance procedure.
- Pareto FM recognises that in some cases, the usual grievance procedure may not be suitable for bringing a complaint relating to a breach of this Equality Diversion & Inclusion Policy. This may be because, for example :-
 - a. Your complaint involves the person identified in the usual grievance procedure as the person to whom you should raise your grievance; or
 - b. You feel that you would like some impartial counselling or assistance; or
 - c. It is not possible or appropriate for either you or Pareto FM to adhere to the time limit set out in the grievance procedure. If the grievance procedure is not appropriate you should approach your Line Manager who will help you decide how to proceed.
- If the matter relates to sexual or racial harassment or harassment on the basis of disability, then the matter should be raised in accordance with the Dignity at Work Policy, as appropriate.
- Your complaint will be thoroughly investigated in line with the principles set out in the relevant procedure. If the investigation reveals that your complaint is valid, the disciplinary procedure will be implemented where appropriate to address the matter with a view to ensuring that it does not happen again.
- You will be protected from any intimidation, victimisation or discrimination for bringing a complaint under this Policy or taking part in any investigation unless you have acted in bad faith or have made untrue statements. Any retaliation against an employee for bringing a



complaint will be treated as a disciplinary offence.

Responsibility of employees

- It is the responsibility of everyone working for Pareto to ensure that they play a part in eliminating discrimination. All employees, therefore, have a personal responsibility to ensure compliance with this policy. Failure to do so may result in disciplinary action being taken and in certain circumstances may lead to dismissal.
- Employees who take part in discriminatory conduct may also be sued personally by the victim and in serious cases may face criminal charges.
- Those involved in the recruitment, selection, training and promotion, have particular responsibility for the practical implementation of this policy.

Monitoring

Employees and job applicants may be asked to give personal details relating to sex, race, ethnic origin and any disabilities. This information is treated with the utmost confidentiality, as detailed in our Data Protection Policy.

James Clarke, CEO
November 2024