

# Group Equality, Diversity, and Inclusion Policy

Gamma Communications plc (“Gamma”)

## Introduction

At Gamma, we are committed to creating an inclusive environment where everyone feels they belong. Belonging is integral to Gamma's culture and values. We therefore have a responsibility to ensure that our people are valued, treated fairly, and treat others fairly in a workplace that is free from any form of discrimination. Gamma will not tolerate any form of discrimination, victimisation or harassment.

We recognise that our people come from various backgrounds and have many differences and it is our belief that diversity, inclusion and belonging enhances creativity and innovation, which in turn enables us to achieve greater success.

## Aims and Goals

The purpose of this policy is to provide equality and fairness for all. Gamma is fully committed to the elimination of unlawful and unfair discrimination.

By working together and respecting one another we can continue to make Gamma a great place to work and one that is reflective of all sections of society.

## Scope

This policy applies to all employees, external job applicants, potential or existing customers, contractors, business contacts, other third parties and members of the public. It may include situations outside of work where there is a close link to the work (e.g., social events organised by the business or representatives of the business). All employees are responsible for the promotion and application of this policy.

For our entities outside the UK, where applicable, local laws and practices will supersede this policy.

## Policy statements

Gamma is an equal opportunities employer, recognising that our continuing success in a highly competitive marketplace depends on our employees and their development.

1. Gamma will not discriminate because of:
  - a. Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation and caring responsibilities.
  - b. Any other irrelevant factor and will build a culture that values belonging, inclusion, meritocracy, openness, fairness and transparency.
2. Gamma is committed to:
  - a. Creating an environment in which individual differences and the contributions of all team members are recognised and valued.
  - b. Creating a working environment that promotes dignity and respect for every individual.

- c. Encouraging anyone who feels they have been subject to discrimination to raise their concerns so we can apply corrective measures.
- d. Encouraging all employees to treat all stakeholders with dignity and respect regardless of the criteria described in policy statement 1 and 2.
- e. Ensuring that our workplaces are free from unlawful discrimination.
- f. Making training, development, and progression opportunities available to all employees.
- g. Not tolerating any form of intimidation, bullying, harassment, victimisation and unlawful discrimination and to discipline those who breach this policy.
- h. Promoting Diversity, Equality and Inclusion in the workplace, which Gamma believes is in the best interests of the company.
- i. Regularly reviewing our employment practices and procedures so that fairness is maintained.

Efforts are also made to ensure that part time employees, as well as those on fixed term contracts, are not treated less favourably due to the contract they are employed under.

## Roles and Responsibilities

Role	Responsibility
ExCo	<ul style="list-style-type: none"> <li>• Exhibit Gamma values and behaviours and act as role models for managers and employees.</li> <li>• Demonstrate commitment to diversity management and promote an inclusive and harmonious workplace.</li> <li>• Communicate and reinforce the importance of an inclusive workforce.</li> </ul>
People Team	<ul style="list-style-type: none"> <li>• Promote an organisational culture which values Equality, Diversity and Inclusion</li> <li>• Undertake regular reviews of key policies, procedures and strategies to ensure that they do not directly or indirectly discriminate against groups or individuals within the organisation.</li> <li>• Monitor our recruitment process from application to employment to identify barriers to this policy.</li> <li>• Adhere to employment law and best practice. Provide equal access to information and training to employees irrespective of location.</li> </ul>
Line Manager	<ul style="list-style-type: none"> <li>• Act as a role model to encourage and support Equality, Diversity and Inclusion within teams and raise awareness of the importance of fairness, equity and encouraging teams to speak openly.</li> <li>• Manage and deal with concerns related to potential discrimination in an effective and prompt manner, seeking support from the People Team as needed.</li> <li>• Provide relevant support to team members who may be experiencing discriminatory behaviour and encouraging them to report it informally or formally.</li> <li>• Apply employment practices and policies in a fair and equitable way for all.</li> </ul>
All employees	<ul style="list-style-type: none"> <li>• Take personal responsibility for gaining understanding of and implementing the policy.</li> <li>• Set an exemplary standard for others and challenge discriminatory behaviour.</li> <li>• Ensure behaviour is aligned to this policy and to treat everyone with dignity and respect.</li> <li>• Ensure that any concerns regarding discrimination in the workplace or service delivery are brought to the attention of a manager or the Gamma People team.</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• Participate in equality and diversity training.</li> <li>• Promote an organisational culture which values Equality, Diversity and Inclusion</li> <li>• Responsible for the promotion and advancement of this policy.</li> </ul>

## Governance and Reporting

Any employee who witnesses or experiences any form of discriminatory behaviour is strongly encouraged to report the incident to their line manager, a senior manager or the People Team. Following disclosure, the matter will be investigated in a timely manner using the most appropriate procedure internally, potentially the corporate investigations procedure or local grievance procedures.

Employees who are concerned about reporting discriminatory behaviour may also report it anonymously using information found in the [Whistleblowing policy](#) and internal Whistleblowing procedure (located on the local People Team SharePoint site).

The People Team is responsible for monitoring and reporting on grievances and disciplinaries internally to ensure training is provided appropriately.

## Enforcement

Behaviour, actions, or words that breach the policy will not be tolerated and will be dealt with in line with local grievance and disciplinary policies. Whilst this policy does not form part of a Contract of Employment, all employees have a responsibility to comply with it and to ensure its terms are complied with.

Anyone who believes that they may have been disadvantaged on discriminatory grounds is entitled to raise the matter through the local Grievance or Whistleblowing procedures. Violations of this policy may be considered as gross misconduct and may lead to disciplinary procedures (up to and including dismissal).

## Glossary

Term/Abbreviation	Meaning
Equality	Equality refers to the fair treatment of all regardless of any protected characteristics. An equal workplace is not just one that is free from discrimination; true equality means that all individuals have genuine and equal access to opportunities and are celebrated for their differences.
Diversity	Diversity is recognising difference, acknowledging the great benefits of having a range of perspectives in decision-making and the workforce being representative of Gamma's customers and society as whole.
Inclusion	Inclusion is a workplace where individual differences are valued and celebrated to enable everyone to thrive at work. Every individual should feel they belong, that their contribution matters and that they are able to perform to their full potential regardless of their background, identity or circumstances. Gamma aims to create an inclusive environment for all, recognising, accepting and celebrating all differences to enable all employees to reach their full potential.
Unlawful discrimination	<p><b>Direct discrimination</b> – where a person is treated less favourably than another because of a protected characteristic.</p> <p><b>Indirect discrimination</b> – where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.</p>

Term/Abbreviation	Meaning
	<p><b>Disability discrimination</b> – occurs where an individual is unjustifiably disadvantaged in employment/recruitment for a reason connected with their disability unless the discrimination cannot be avoided by making reasonable adjustments.</p> <p><b>Associative discrimination</b> – where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership and pregnancy and maternity).</p> <p><b>Perceptive discrimination</b> – where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).</p> <p><b>Victimisation</b> – occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.</p> <p><b>Failure to make reasonable adjustments</b> – where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.</p>