

## EQUAL OPPORTUNITIES DIVERSITY AND TREATMENT OF EMPLOYEES STATEMENT

### **1. Introduction and Aim of Policy**

The Company operates an equal opportunities policy. MLB Steel Ltd recognises that discrimination is not only unacceptable, it is also unlawful.

The Company's aim is to ensure that no job applicant or employee is discriminated against, directly or indirectly, on the grounds of race, sex, sexual orientation, gender reassignment, age, marriage and civil partnership, religion or belief, disability or being part-time.

By including this policy in the Employee Handbook, you are made aware that the Company will act in accordance with all statutory requirements and take into account any relevant codes of practice.

### **2. Scope and Purpose of the Policy**

This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment. All job applicants will be considered solely on their ability to do the job. Interview questions will not be of a discriminatory nature.

All promotions will be made on merit in line with the principles of the policy.

Employees who have a disability will receive the necessary help, within reason, to enable them to carry out their normal duties effectively.

This policy will be assessed at regular intervals to ensure that equality of opportunity is afforded to all employees.

### **3. Forms of Discrimination**

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out in clause 1. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time could potentially put women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Discrimination includes behaviour in relation to a protected characteristic, whether or not your

#### **MLB STEEL LTD**

Units 10 & 11, Rolls Royce Estate, Spring Road, Ettingshall  
Wolverhampton, West Midlands WV4 6JX

Tel +44 (0)1902 408011  
[www.mlb-steel.com](http://www.mlb-steel.com)

actions are directed to a person with the protected characteristic. Discrimination by association (i.e. behaviour towards a person who associates with an individual with a protected characteristic) and by perception (i.e. behaviour towards a person you incorrectly believe has a protected characteristic) will not be tolerated.

#### **4. Recruitment and Selection**

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics in law.

Applicants should not generally be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the Managing Directors approval. Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters in relation to any of the protected characteristics as listed in clause 1.

We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce specified original documents (such as a passport or Birth Certificate) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the UK Border Agency. Those prospective employees who are not able to produce the specified documentation will have their offers of employment withdrawn to allow us to comply with our statutory obligations in relation to immigration control.

#### **5. Termination of Employment**

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

#### **6. Disability Discrimination**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your Manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

#### **MLB STEEL LTD**

Units 10 & 11, Rolls Royce Estate, Spring Road, Ettingshall  
Wolverhampton, West Midlands WV4 6JX

Tel +44 (0)1902 408011  
[www.mlb-steel.com](http://www.mlb-steel.com)

## 7. Fixed-Term Employees and Agency Workers

We will endeavour to ensure that fixed-term employees and agency workers, conditions of service, have access to permanent employment opportunities and any other benefits our permanent employees have. We will, where relevant ensure that they are accessing permanent vacancies.

## 8. Part-Time Work

We will endeavour to ensure that part-time employees are not treated less favourably than full time employees, that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

## 9. Breaches of this Policy

If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations will not be victimised or treated less favourably as a result. False allegations will, however, be dealt with under our Disciplinary Procedure.

Any member of staff who is found to have committed an act of discrimination will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal without notice. We take a strict approach to serious breaches of this policy.

Signed:



Chad Ward  
Managing Director  
3<sup>rd</sup> April 2019

### MLB STEEL LTD

Units 10 & 11, Rolls Royce Estate, Spring Road, Ettingshall  
Wolverhampton, West Midlands WV4 6JX

Tel +44 (0)1902 408011  
[www.mlb-steel.com](http://www.mlb-steel.com)