



Equalities Policy

DAI is a people business working throughout the developing world. Its success hinges on its people and their diversity. This applies equally to those working for the company, our clients, beneficiaries and all other stakeholders. Ensuring that we can capitalise on the uniqueness of those who work for and with us and make use of their different perspectives and experiences can only add value to our business.

The management of DAI are committed to a philosophy of equality of opportunity for all. This ethos applies through all aspects of our work and is reflected in our core values, our code of ethics and our professional code. DAI is an environment where diversity is not only welcomed but highly valued.

We are committed to: promoting equality and diversity in all aspects of employment; creating and sustaining a culture in which equality of opportunity is actively promoted for all staff in every aspect of the working environment; and to fulfilling our obligations under the Equality Act 2010. We oppose all forms of unlawful or unfair discrimination on any grounds including, but not limited to: age; disability; marital status; political opinion; pregnancy or maternity; race, nationality, ethnic or national origin; religion or belief; sex; sexual preference or gender reassignment. We also aim to ensure that conditions or requirements, which cannot be shown as justifiable in terms of business operations, disadvantage none of our people.

We believe that it is important to ensure that talents and skills available throughout the community are considered when employment opportunities arise. To this end, within the framework of the law, the company is committed wherever practicable, to achieving and maintaining a workforce which broadly reflects the local community in which that part of the business may operate.

We are committed to providing staff of all ages and backgrounds with opportunities to maximise their skills and achieve their potential. We encourage a diverse workforce and aim to provide an environment where staff are valued and respected and where discrimination, bullying and harassment are not tolerated. It is the duty of all employees to accept their personal responsibility for the practical application of this policy and to ensure that their individual behaviour respects others and the requirements of this policy at all times.

The Equalities Policy is applied to all aspects of employment from the moment the decision is made to recruit to a member of staff leaving our employ. Every possible step is taken to ensure that all individuals are treated fairly and equally and assessment for recruitment, selection and appraisal, training and career progression are based solely on objective and job-related criteria ensuring that any decisions are based entirely on the individual's ability and suitability for the work in question. All decisions relating to conditions of service or any other aspect of employment which may affect individuals, groups or our entire staff are checked to ensure that there is no risk of any unintended discrimination.

This policy applies equally to the treatment of our clients and beneficiaries and to all aspects of the company's dealings with the general public, suppliers and staff.

The overall responsibility for ensuring the effective implementation of this policy rests with the Human Resources function. The Senior Management Team of DAI is committed to the effective implementation of this policy and the promotion of equality of opportunity throughout the company's operations.



All employees have a responsibility to observe this policy and to ensure that equality of opportunity is continuously provided for in the company's activities. In addition, all the company's managers and supervisors have a particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

All staff are made aware on the implementation and application of this policy, commencing at induction stage and on-going training where appropriate.

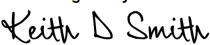
Discrimination will not be tolerated and any breaches of this policy are and will be regarded as misconduct and will lead to disciplinary proceedings.

Progress on the implementation of this policy is reviewed annually by the Director of Human Resources. In order to undertake this review, to evaluate the effectiveness of our Equalities Policy, and to be able to act where evidence indicates unfair treatment, data is collected for the purposes of monitoring the company's workforce. In line with the requirements of the Data Protection Act 1998 the data collected will be used purely for these purposes and for no other (unless staff are advised otherwise and their consent provided in advance). As well as monitoring the diversity of the company's workforce the data is used to highlight if any action is required in order to provide for the requirements of specific areas of the workforce to ensure that no-one is working at a disadvantage. Appropriate action will then be taken to redress any identified inequality.

There are nine protected characteristics under the Equalities Act 2010. These are: age*, disability*, gender reassignment, marriage & civil partnership, pregnancy & maternity, race*, religion & belief*, sex* and sexual orientation*. Those marked with an asterisk are monitored. Any data produced is in the form of numbers and does not identify individuals.

In addition to the above we would encourage you to share any other information which may affect your ability to perform with HR so that we can look at any adjustments that could be made in order to support you in the performance of your responsibilities.

Any employees who believe they have suffered any form of discrimination, harassment or victimisation are entitled to raise these matters through the grievance procedure. All complaints of discrimination will be dealt with promptly, seriously and confidentially.

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Keith Smith
Senior Vice President, HMG
DAI Global UK
1 November 2020



DAI Equalities Policy – Supporting Information

The following is intended to provide further information to assist you in our aim of providing a transparent, open and fair working environment where diversity is both welcomed and valued.

1. Equality Act 2010

The Equality Act 2010 brings together a whole raft of previous discrimination legislation thereby simplifying this complex area of law. The nine previous separate pieces of anti-discrimination legislation included the Equal Pay Act 1970, Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995 and the range of Employment Equality Regulations relating to religion or belief, sexual orientation and age.

The Equality Act 2010 is intended to protect the rights of individuals and advance equality of opportunity for all; to update, simplify and strengthen the previous legislation; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

Provisions introduced by this act of parliament and currently in force are as follows:

- The basic framework of protection against direct and indirect discrimination, harassment and victimisation in services and public functions; premises; work; education; associations; and transport.
- Changing the definition of gender reassignment by removing the requirement for medical supervision - so a man choosing to dress and live as a woman (or vice versa) would be protected whether with medical support or not.
- Providing protection for those discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic – for example carers.
- Clearer protection for breastfeeding mothers.
- Applying the European definition of indirect discrimination to all protected characteristics.
- Extending protection from indirect discrimination to include disability.
- Introducing a new concept of “discrimination arising from disability”.
- Making it more difficult for disabled people to be unfairly screened out when applying for jobs by restricting the circumstances in which employers can ask job applicants questions about disability or health.
- Allowing claims for direct gender pay discrimination where there is no actual comparator.
- Making pay secrecy clauses unenforceable.
- Extending protection in private clubs to include sex, religion or belief, pregnancy and maternity and gender reassignment.
- Introducing new powers for employment tribunals to make recommendations which benefit the wider workforce.
- Harmonising provisions allowing voluntary positive action and legalising positive action in recruitment and promotion.
- The public sector Equality Duty.
- Some provisions of the Act are still being considered, for example taxi accessibility; and auxiliary aids in schools. None of the outstanding provisions would affect DAI directly.

2. Standards of Behaviour

We all need to be aware of the effect that our behaviour might have on others. Something that we think is innocuous could be totally different for someone else. This applies to all aspects of behaviour – spoken or written word, imagery, facial expressions, mimicry, jokes, pranks, and so on – and at all times – during working hours, at any company social events, whenever representing the business whether in the UK or overseas, etc. So, for example,



referring to women as 'girls' could be deemed to be patronising and degrading, and the same could apply to referring to men as 'boys'.

The behaviour in question does not need to be directly aimed at an individual to qualify as harassment. It could be aimed at a group of people but be found offensive by one member of the group, or it could be aimed at someone with whom you are associated or directed at someone else entirely but you find the behaviour in question offensive.

If involved in any form of selection procedure, whether that be for recruitment, promotion, training and so on, no reference should be made to any of the protected characteristics. Selection should stick purely to the criteria for the job and there should be no reference in interviews to individuals' private lives, living arrangements, plans to get married, have children, etc.

3. Definitions

Combined or dual discrimination is direct discrimination resulting in less favourable treatment because of a combination of two protected characteristics.

Direct discrimination is when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

Disability is defined as a physical or mental impairment which has a substantial and long-term adverse effect on the individual's ability to carry out normal day-to-day activities. This includes such activities as using a telephone, reading a book or using public transport. A disability is not necessarily visible and includes long-term illnesses such as cancer, HIV and multiple sclerosis.

Discrimination arising from disability means discriminating against someone because of something connected with their disability if the employer knows, or could reasonably be expected to know, that the person has a disability. For example, discriminating against someone with a tendency to make spelling mistakes when in fact they have dyslexia.

Discrimination by association is direct discrimination against an individual because they associate with someone who possesses a protected characteristic.

Gender reassignment provides protection for transsexual people ie, someone who proposes to, starts or has completed a process to change his or her gender. There is no longer a requirement to be under medical supervision in order for protection to be in place.

Harassment is 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'. It is possible to suffer harassment even if you are not the direct recipient of the behaviour and if you do not possess the protected characteristic yourself. Protection also exists for harassment because of perception and/or association. 'Unwanted' is the same as unwelcome or unwanted. It isn't necessary for an objection to be made to the behaviour for it to be 'unwanted'.

Indirect discrimination can occur when you have a condition, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can only be justified if it can be proved to be 'a proportionate means of achieving a legitimate aim'.



Marriage and civil partnership. Those who are married or in a civil partnership are protected against discrimination.

Perception discrimination is direct discrimination against an individual because it is thought that they possess a protected characteristic. It applies whether the individual has that protected characteristic or not.

Pregnancy and maternity. A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled.

Protected characteristic refers to the nine categories covered by the Equalities Act under which there is protection from discrimination. These categories are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Race includes colour, nationality, ethnic or national origin.

Religion or belief. Religion includes any religion or a lack of religion. A religion must have a clear structure and belief system. Belief means any religious or philosophical belief or lack of such belief. In order to qualify for protection under the act a belief must satisfy certain criteria including that it is a weighty and substantial aspect of human life and behaviour. It must also be worthy of respect in a democratic society, not incompatible with human dignity and not conflict with the fundamental rights of others. Denominations or sects within a religion can be considered as a protected religion or religious belief.

Sex refers to gender. Both men and women are protected under the Act.

Sexual orientation provides protection for bisexual, gay, heterosexual and lesbian people.

Victimisation occurs when an employee is badly treated because they have made or supported a complaint or raised a grievance under the Equality Act, or because they are suspected of doing so. There is no protection if they have maliciously made or supported a complaint which proves to be untrue.



4. Sources of further information

The Equality and Human Rights Commission

<https://www.equalityhumanrights.com/en>

Government Equalities Office

<https://www.gov.uk/society-and-culture/equality>

ACAS

<https://www.acas.org.uk/>

Access to Work

<https://www.gov.uk/access-to-work>

Association of Disabled Professionals

<http://www.adp.org.uk/>

Employers Network for Equality & Inclusion

<https://www.enei.org.uk/>

Equally Ours

<https://www.equallyours.org.uk/>

Business Disability Forum

<https://businessdisabilityforum.org.uk/>

Gender Identity Research and Education Society

<https://www.gires.org.uk/>

The Gender Trust

<http://www.gendertrust.org.uk/>

Healthy Minds at Work

<https://healthymindsatwork.co.uk/>

Mindful Employer

<https://www.dpt.nhs.uk/mindful-employer>

Stonewall

<https://www.stonewall.org.uk/>

Workwise

<https://www.workwiseuk.org/>