Abacus®
Leaders in Lighting

Diversity & Harassment Policy	Issue 06
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	Effective from: 01/05/2026
Policy Statement	updated: 01/05/2026
	Prepared by: Stacey Kokuciak
	Approved by: Steve Lamb

Purpose
This policy outlines the organisation's approach to equality, diversity and harassment at work. It is important to ensure all staff understand the concepts of equality, diversity, harassment & bullying and staff ensure 3rd parties understand the policy and its contents.

Equality (or equal opportunities) is about protecting certain groups of staff against unfair treatment based on a particular personal characteristic. This protection is normally based on those groups covered by legislation i.e. gender, race, disability, sexual orientation, religion or belief and age.

Diversity is about recognising, valuing and using the differences which people have. There is no definitive list of what these differences are however the Company will recognise any approach submitted by any individual for investigation.

The purpose of this policy is to encourage an atmosphere in which all staff embrace the benefits of working in a diverse workforce and to promote fair and equal treatment for all employees, job applicants, customers, suppliers and visitors, irrespective of their individual differences or any personal characteristics.

This policy relates to all aspects of employment, including but not limited to, individual standards of behaviour, the advertisement of jobs, recruitment and selection, training and development, appraisal, pay, promotion and leaving the company. The principles apply equally to all dealings with customers, suppliers and visitors.

The company is committed to the principle of valuing equality, diversity and harassment. We recognise the benefits that can be secured through employing a diverse workforce and harnessing the individual talents of staff from different backgrounds and with different skills. These include:

- Tangible business benefits such as improved staff morale, absence levels, customer satisfaction and profits
- An improved company image leading to a wider customer base and a wider pool of people to recruit from.
- The avoidance of costly legal proceedings caused by breaches of equality legislation.

We are committed to providing fair and equal treatment for all staff, customers, suppliers and visitors and all staff and 3rd parties are expected to treat everyone with whom they meet with dignity and respect. Staff and 3rd parties should be aware of the importance the company attaches to this policy and that breaches will be classed as disciplinary offences and dealt with accordingly.

Legal Obligations
In valuing diversity the company commits itself to ensuring the legal requirements regarding equality are met. However, in applying this policy the company still needs to take account of current and future equality legislation (and associated codes of practice) including, but not limited to the Equality Act 2010, Amendment 2023 and Worker Protection Amendment to Equality Act 2024

The above legislation protects individuals against direct discrimination, indirect discrimination, harassment (including bullying) and victimisation because of their gender, race, disability, sexual orientation, religion or belief, and age. This includes but not limited to:-

- **Direct discrimination** is treating a person less favourably because of a particular personal characteristic or background.
- **Indirect discrimination** is applying a criteria or practice equally to all people but which has the effect of disadvantaging one group of people.

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- **Harassment** is unwanted behaviour which affects the dignity of others.
- **Bullying** is a form of harassment which is normally related to an abuse of power.
- **Victimisation** is treating a person less favourably because they have asserted their rights under this policy or equality legislation (i.e. made or assisted with a complaint).
- **Sexual Behaviour or Sexual Intimidation and Harassment** towards others is to use language or behaviour which may or may not include physical contact which makes a person feel uncomfortable, intimidated, degraded, or humiliated. Examples include unwanted comments, inappropriate touching, persistent requests for encounters, and sharing explicit content which could include indirect visual or audio transmission.

Responsibilities
All staff are expected to have read and understood this policy, ensure they behave in accordance with its principles, encourage the same level of behaviour in colleagues and immediately report any breaches witnessed. 3rd parties will be made aware of this policy should the Company receive any complaint in relation to any part of the policy and will be expected to comply with its contents.

The company expects all staff and 3rd parties to always conduct themselves in a professional and considerate manner complying with a general standard of behaviour. The company will not tolerate behaviour such as:

- Physical violence
- Shouting or swearing
- Rudeness
- Isolating, ignoring or refusing to work with certain people
- Telling offensive jokes or name calling
- The display of offensive material such as pornography or sexist/racist cartoons
- Lewd gestures or remarks
- Physical aggravation or contact however it may be portrayed.

It is no defence for staff or 3rd parties to say they did not intend their behaviour to cause offence as it is for the person on the receiving end of the behaviour to decide what they consider to be offensive. It is the impact of the behaviour rather than the intent which is important.

Managers are made aware of the contents and requirements of this policy through continual updates and presentations from HR and the Managing Director. Managers are responsible for ensuring this policy is understood and complied with by staff and 3rd parties in their area, dealing with breaches and complaints (whether reported or not) seriously, speedily, sensitively, in accordance with company procedures and policies, confidentially and contributing ideas for the advancement of diversity principles within the organisation.

The Managing Director has overall responsibility for this Policy.

Breaches
A breach of this policy may be treated as a disciplinary issue. Additionally, if legal requirements are contravened, both the company and the employee concerned may be liable to legal proceedings and risk having unlimited damages awarded against them.

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Alternatively, some form of training or education may be more appropriate where minor breaches have occurred due to a lack of understanding of equality and diversity principles.

Communication
In order to ensure the principles of this policy are embedded in everything we do, all existing staff have access to this policy and training regarding how it should be interpreted. This policy is covered in all inductions. Managers are made aware of the contents and requirements of this policy through continual updates and presentations from HR and the Managing Director.

Recruitment and Selection
Individuals involved in the recruitment and selection of staff will ensure the company recruitment and selection policy is adhered to and that:

- A carefully worded and objective job description/person specification is produced for all roles, outlining the essential skills, knowledge and experience required.
- Job advertisements are agreed by the HR Manager and the appropriate manager/director and circulated to encourage applications from all sections of the community. Advertisements will not contain any age limits or gender specification.
- Short-listing and selection will be based on objective criteria relevant to the job and decisions made by suitably trained staff, purely based on merit. The reasons for all decisions will be recorded

Training, Development and Promotion
The company will ensure that irrespective of any personal characteristics:

- The training necessary to implement this equality policy is provided.
- All employees are encouraged to achieve their full potential.
- Selection for all training, career development opportunities and job moves will be purely based on merit.
- Appraisals of performance will be conducted objectively and on time.
- Selection for promotion will be purely based on merit.

Meeting Individual Needs
As far as possible the company will try to meet the needs of individuals at work. For example:

- Caring and domestic responsibilities - time off may be appropriate to allow staff to care for children or dependant relatives to help them balance their work and home responsibilities.
- Working patterns - wherever possible training courses and meetings should be planned to allow attendance by staff working non-standard hours.
- Disability - disabled staff and customers should be consulted about any reasonable adjustments which could be made to allow them to better perform their functions.
- Religious practices - it may be necessary to provide time off for prayer or religious festivals or relax dress standards to meet religious needs.

Complaints
If staff feel this policy has been breached, they should to speak to their Manager in the first instance who will ensure all issues are investigated and dealt with appropriately.

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Formal complaints about breaches of this policy can be made the using company's grievance procedure, and complaints should be made to a Line Manager or the HR Manager as appropriate.
Further advice and support regarding complaints can be obtained from Line Managers or the HR Manager.

Monitoring, Review and Consultation
The effectiveness of this policy will be monitored through the collation of statistics broken down by but not limited to gender, race, disability, sexual orientation, religion or belief, age.and any other areas where it is perceived problems exist. The results of this monitoring will be used in Management statistical records.

This policy will be reviewed annually to ensure it remains current and links appropriately with other policies. Staff and their representatives will be consulted as part of the review process.
The principles of this policy will also be considered when developing other new organisational policies.

S. A. Lamb

Steve Lamb
Chairman
Date: 01/05/2026