

### Policy

Vital Energi Utilities Ltd (Vital Energi) is opposed to all forms of discrimination and selection for employment, training and promotion will be on the basis of suitability for the job/merit. It is Company policy to treat all job applicants and employees fairly and equally regardless of sex, pregnancy and maternity related, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, age, race, colour, nationality, national or ethnic origins or disability. The Company will monitor the composition of the workforce to ensure that this policy is effective.

### Equality Act 2010

The Equality Act 2010 applies to all employers and protects:

- Employees
- Contractors
- Casual and/ or seasonal workers
- Temporary workers
- Part-timers
- Agency staff, provided they are employed by the agency on a contract of employment or can show that there is (or was) an implied contract of employment or contract for services between them and the client organisation to which they are (or were) assigned
- Home workers
- Job applicants
- (In some cases) ex-employees.

All of the above have the right not to be discriminated against, victimised, harassed or subjected to any other form of detriment because of any of the age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex or sexual orientation and any infringement of the policy will not be tolerated. Disciplinary action will be considered in accordance with Company policy regardless of whether the infraction takes place inside or outside Company premises or inside or outside normal working hours.

Vital Energi's HR & People Director is responsible for the monitoring, updating and implementation of this policy. For employees details are available which is available via the normal platforms of communication; intranet, Knowledge Hub or upon request. Clients or members of the public should write to: People & HR Director, Vital Energi, Century House, Roman Road, Blackburn, Lancashire. BB1 2LD or telephone 01254 296 000.

### Our Aim and Uploading this Policy

Where appropriate, and before taking any formal disciplinary action, the Manager/ Supervisor will make every effort to resolve the matter by informal discussions with the employee. Minor misconduct, poor performance or minor breaches of rules will normally result in an informal warning being given by the immediate manager. Only where this fails to bring about the desired improvement should the formal disciplinary procedure be implemented.

The aim of this policy is to ensure that the Company follows good employment practices and all reasonable steps are taken to prevent discrimination on all grounds to all within the Company. This policy should be adhered to at all times by all levels throughout the Company. Managers and employees have a personal responsibility for the successful implementation of this policy; with the HR & People Director overall taking responsibility to implement this throughout the Company.

The Company ensures the fair treatment of its employees by removing any barriers preventing the implementation of this policy. The policy applies to the advertisement, recruitment and appointment of jobs, conditions of work, training and promotion of an individual, remuneration and other employment practices that affect all levels of employees within the Company.

As an organisation, we strive to:

- accept that everyone has a right to their distinctive and diverse identities;
- understand how equal opportunity can improve our ability to compete in the marketplace;
- provide all employees with the training and development they need to achieve the Company's aims and objectives; and
- provide a supportive, open environment in which individuals have the opportunity to reach their highest potential.

Vital Energi aims to establish an inclusive culture, free from discrimination and based upon the values of dignity, courtesy and respect. Every person has a right to be treated in accordance with these values.

We aim to:

- Promote a positive environment in which people are treated fairly and with respect;
- Encourage all directors, staff and visitors to play a role in creating and maintaining an environment in which harassment, bullying and victimisation are understood to be unacceptable forms of behaviour;
- Provide a framework of support for directors, staff and visitors who feel that they have been the subject of harassment, bullying or victimisation;
- Ensure that allegations of harassment, bullying or victimisation are addressed fairly, with respect for the rights and dignity of all those involved; and
- Identify the appropriate formal processes by which complaints can be raised.

### Equal Pay

Vital Energi objectives relating to equal pay are to:

- Promote and achieve equality of opportunity for men and women;
- Eliminate any unfair, unjust or unlawful practices that impact on pay;
- Take appropriate remedial action; and
- Review other Company policies to ensure consistency with equal pay principles.

To achieve these objectives, we will:

- Implement regular equal pay audits and reviews for all staff (including staff on maternity or sick leave);
- Provide training and guidance for staff involved in determining pay;
- Inform staff of how these practices work and how their own pay is determined;
- Respond to grievances on equal pay as a priority;
- Monitor pay statistics regularly and gather other relevant information to assess the impact of this Policy; and
- Ensure that any differential in pay is due to a "material factor" such as skills and qualifications, performance and levels of responsibility.

Responsibility for this Policy and for ensuring that the Company's policies and practices comply with equal pay legislation rests with the HR Department.

Decisions on initial placing of new staff and their salary scales will be taken by the appropriate Board Director and the People & HR Director.

### Monitoring and Reviewing the Policy

The effectiveness of our equal opportunity policy will be monitored throughout the Company.

Vital Energi will implement the policy by:

- Communicating the policy and associated procedures to all staff on a regular basis via the Company intranet, noticeboards, emails and training;

- Training all staff in the meaning of equality, diversity and discrimination, with the offer of additional training for those who have management responsibilities or who are involved in any recruitment processes;
- Making sure the policy and procedures are actually carried out;
- Monitoring the effectiveness of the policy;
- Dealing with complaints effectively; and
- Obtaining the commitment of senior managers

All staff are responsible for tackling equality and diversity issues in their day-to-day work and are expected to behave appropriately at all times. They are required to recognise and respect the different backgrounds of colleagues and visitors, and meet the equality and diversity targets identified by the Company.

Managers must consider equality issues in business plans and in individual performance reviews.

HR will monitor and review the progress of our equality and diversity in work as part of each member of staff's work review and performance appraisals on an annual basis. The HR Department, with the support and encouragement of the Board of Directors, will agree and review the overall policy and strategy on an annual basis or when legislative changes occur. When any procedures are updated, we will endeavour to ensure that an equality assessment is undertaken.

All employees and job applicants will be asked to supply equality related data to the HR Department. This data will only be used to monitor our equal opportunity policy and will be treated as sensitive confidential information. The information provided by job applicants will not be divulged to any persons connected to the selection process.

### Recruitment

The Company is opposed to all forms of discrimination and will select for employment, training and promotion on the basis of suitability for the job and/ or merit. It is Company policy that no job applicant or employee receives less favourable treatment than another by any means of direct and indirect discrimination on the grounds of sex, race, colour, age, ethnic or national origins, sexual orientation political affiliations, religious beliefs, marital status, physical disablement or is disadvantaged by unjustifiable conditions or requirements.

We use a wide variety of recruitment methods as access the widest possible range of talent and experience in the marketplace, including but not limited to:

- External recruitment;
  - national advertising and CV searching
  - employment agencies
- Internal recruitment, including personal recommendations through our recruitment referral procedure (see separate policy).

On all our recruitment advertisements, both internal and external, we utilise the following wording to encourage a diverse range of applications:

*"The company is opposed to all forms of discrimination and will select for employment, training and promotion on the basis of suitability for the job and/ or merit. It is company policy that no job applicant or employee receives less favourable treatment than another on the grounds of sex, race, colour, age, ethnic or national origins, political affiliations, religious beliefs, marital & civil partnership status, physical disability, sexual orientation, gender reassignment, pregnancy & maternity related or is disadvantaged by unjustifiable conditions or requirements."*

Our search for talent includes the employment of non-UK nationals to work within our organisation. We have a legal responsibility to ensure that all employees are eligible to live and work in the UK, and applicants are required to provide documentary proof upon commencement of employment.

For particularly scarce skills we may apply for a Certificate of Sponsorship (previously Work Permit) for candidates not already eligible to live and work in the UK (where meet government criteria are met). The UK Border Agency (UKBA) considers applications and determines eligibility to live and work in the UK.

Where a suitably skilled and qualified applicant has a disability, the Company will do its utmost to make reasonable adjustments to enable them to carry out their duties.

### Training

The equal opportunities policy is supported by a clear commitment from Vital Energi senior management that any form of discrimination or harassment, even in its mildest forms, will not be tolerated.

Training in equality, diversity and inclusion issues for all staff will be implemented as appropriate, with the aim of eliminating discrimination and harassment at all levels of the organisation. Employees will be informed of what is (and what is not) acceptable behaviour at work and that harassment offends, stops employees working effectively, and can lead to illness and/or resignation. Managers and those who take part in recruitment will receive more in-depth training.

The combination of training and implementation of policies and procedures aims to create a climate within the organisation that is hostile to any form of discrimination or harassment. Employees should never find themselves in an uncomfortable working environment where they do not complain because they fear they will not be taken seriously, fear victimisation, fear being regarded as a troublemaker or because they feel that to complain would be embarrassing.

### Equality in Service Provision

In line with our policy the Company and its staff under the terms of the Equality Act 2010 will not discriminate against, harass nor refuse to provide our expected service nor a less favourable service without reason on the basis of a 'protected characteristic' to any client or member of the public who access our goods, facilities and services. Likewise, any complaint from a Vital Energi employee who experiences discrimination in any form from a client or member of the public will be taken seriously.

Anyone who feels they have been discriminated against should raise their concerns with the HR Department in the first instance. The Company treats such complaints very seriously and will act upon them promptly. If an employee believes a form of discrimination has occurred, they may raise a complaint through the Company's grievance procedure.

### Disability

Employees who are disabled or become disabled during their employment with the Company should inform and advise the Company of any requirements, or adjustments they may feel are necessary to assist with the performance of their duties. Wherever practicable and reasonable the Company will accommodate such requests.



Chairman – Vital Energi Group of Companies

1<sup>st</sup> April 2025



CEO – Vital Energi Group of Companies

1<sup>st</sup> April 2025

*The original signed copy of this document is retained by the HR office*

**Next Reviewed Date: April 2026**