

EQUAL OPPORTUNITIES POLICY

VERSION 1: AUGUST 2017



ABOUT THIS POLICY

It is the SDL Group's policy not to discriminate against its workers or its service users based on their gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability, age, pregnancy or trade union membership or the fact that they are a part-time worker or a fixed-term employee. Our workers and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. SDL always strive to work within legislative requirements as well as promoting best practice.

The long term aim of the board of SDL Group is that the composition of our workforce will reflect that of the local community and that all workers will be offered equal opportunities to achieve their full potential. This policy, and the measures we take to implement it, have been devised based on advice from the relevant governmental and professional bodies. We are committed to a programme of action to make this policy effective and to bring it to the attention of all workers. The principle of non-discrimination and equality of opportunity applies equally to the treatment of visitors, clients, customers and suppliers by members of our workforce and, in some circumstances, ex-employees.

This policy deals with the specific categories of workers and areas of work which we have identified as potentially giving rise to equal opportunities issues and provides more specific guidance on the parameters of our policy and approach to equal opportunities.

All workers have a duty to act in accordance with this policy, and to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them. In some situations, SDL may be at risk of being held responsible for the acts of individual members of staff and will not therefore tolerate any discriminatory practices or behaviour.

This policy applies equally to the treatment of our visitors, clients, customers and suppliers by our workers and the treatment of our workers by these third parties.

POLICY IMPLEMENTATION

The board has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The board has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Head of HR, Liz Brough (liz.brough@sdlgroup.co.uk).

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of SDL regarding equal opportunities. To facilitate this process, managers will be given training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

All members of staff are expected to adhere to this policy and must therefore ensure that they familiarise themselves with it and act in accordance with its aims and objectives at all times.

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SCOPE AND PURPOSE OF POLICY

SDL will not unlawfully discriminate on grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability, age, pregnancy, trade union membership, or part-time or fixed-term status.

This policy applies to

- Advertising of jobs
- Recruitment and selection
- Training and development
- Opportunities for promotion
- Conditions of service
- Benefits and facilities
- Pay
- Health and safety
- Conduct at work
- Grievance and disciplinary procedures
- Termination of employment, including redundancy
- Treatment of clients and customers
- Decisions to enter relationships with third parties.

SDL will take appropriate steps to accommodate the requirements of workers' and clients' religions, cultures, and domestic responsibilities.

FORMS OF DISCRIMINATION

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct Discrimination

Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out in the 'scope and purpose of policy' section above. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination.

Indirect Discrimination

Indirect discrimination occurs where an individual is subject to an unjustified provision, criteria or practice which puts them at a particular disadvantage because of, for example, their gender or race. For instance, a height requirement would be likely to eliminate proportionately more women than men from recruitment. If these criteria cannot be objectively justified for a reason unconnected with gender, it would be indirectly discriminatory on the grounds of gender.

RECRUITMENT AND SELECTION

SDL aims to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed above. Recruitment procedures will be reviewed regularly to ensure that individuals

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are treated based on their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are regularly reviewed to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

SDL takes steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups under-represented in the Group. Where appropriate, use may be made of lawful exemptions to recruit suitably-qualified people to cater for the special needs of particular groups. Vacancy advertisements shall include an appropriate short statement on our equal opportunities policy and a copy of this policy shall be sent to those who enquire about vacancies.

To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified above, and to identify those sections of the local community which may be under-represented in employment, SDL monitors applicants' racial origins, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

STAFF TRAINING, PROMOTION AND CONDITIONS OF SERVICE

Staff training needs will be identified through regular one to ones. All workers will be given appropriate access to training to enable them to progress within the organisation. All promotion decisions will be made based on merit.

The composition and movement of workers at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them. This includes pay, bonus criteria, policies and all benefits offered.

TERMINATION OF EMPLOYMENT

We will monitor redundancy criteria and processes to ensure that they are fair and objective and do not directly or indirectly discriminate against employees.

We will also ensure that disciplinary processes are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

DISABILITY DISCRIMINATION

If you are disabled, or become disabled in the course of your employment with us, you are encouraged to tell us about your condition. This enables us to support you as much as possible. You may also wish to advise your line manager or your HR Business Partner of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. Your line manager or HR Business Partner may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there

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may be circumstances where it will not be reasonable for us to accommodate the suggested adjustments and we will ensure that we provide you with information as to the basis of our decision not to make any adjustments.

SDL will monitor the physical features of its premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other workers. Where possible and proportionate, SDL will take steps to improve access for disabled workers and service users.

FIXED-TERM EMPLOYEES, AGENCY AND TEMPORARY WORKERS

We will monitor our use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress within SDL to ensure that they are accessing permanent vacancies.

PART-TIME WORKERS

SDL will monitor the conditions of service of part-time employees and their progression within SDL to ensure that they are being offered appropriate access to benefits, training and promotion opportunities. We will also ensure requests to alter working hours are dealt with appropriately under our flexible working procedure.

BREACHES OF THE POLICY

If you believe that you have been disadvantaged on any of the unlawful grounds listed above, or if you believe that you have been harassed on any of the unlawful grounds listed above, you are encouraged to raise the matter with us. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant policy. Workers or clients who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our Disciplinary and Capability Policy.

If, after investigation, you are proven to have harassed any other worker on the grounds of gender, marital status, sexual orientation, religion or belief, race, disability or age or otherwise acted in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. SDL will always take a strict approach to breaches of this policy.

As this policy applies equally to SDL workers' relations with visitors, clients, customers and suppliers, if, after investigation, you are proven to have discriminated against or harassed a client or supplier you will also be subject to disciplinary action.

MONITORING AND REVISION OF POLICY

This policy is reviewed annually by the Head of HR, Liz Brough in consultation with the Executive Team. Recommendations for any amendments are reported to the Audit Committee and SDL Stat Board.

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We will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated by monitoring the composition of job applicants and the benefits and career progression of our workers.

SDL is committed to providing relevant training for all staff on their responsibilities and duties under this policy.