



EQUAL OPPORTUNITIES, DIVERSITY  
AND INCLUSION  
POLICY AND PROCEDURE

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## 1 PURPOSE

The purpose of this policy is to establish the standards, attitudes and approach ICTS (UK) Ltd expects of all of its employees in respect of equal opportunities, diversity and inclusion.

## 2 SCOPE

This Policy applies to all ICTS (UK) Ltd job applicants and employees in the UK.

The policy does not cover what specific sanctions that may be imposed on any employee found in breach of this policy. Any breaches of this policy should be managed in accordance with ICTS Disciplinary Policy and Procedure.

## 3 POLICY STATEMENT

ICTS (UK) Ltd encourages a working environment in which diversity is recognised, valued and encouraged; appreciating the multi-cultural and diverse nature of the UK workforce and society in general. The Company are committed to principles of fairness and mutual respect in which the concept of individual responsibility is accepted by all. It is therefore the responsibility of all employees to ensure they always observe and adhere to this policy at all times. Any breach of this policy will be taken very seriously and will lead to disciplinary action being taken; which may include summary dismissal in instances that are found to amount to gross misconduct.

ICTS UK recognises that discrimination in the workplace in any form is unacceptable and, in most cases, unlawful. The Company has therefore adopted this policy to ensure that all job applicants and employees are treated fairly and without favour or prejudice. ICTS (UK) Ltd is committed to applying the principles of this policy throughout all areas of employment including; recruitment and selection, training, development, benefits, rewards, promotion, dealing with grievances and in the treatment of disciplinary issues.

This policy is maintained in accordance with current legal requirements and will be updated in the event of any change in the law. However, the Company recognises that equality of opportunity is best achieved by a day to day commitment throughout the organisation; with support and training where necessary.

The selection methods ICTS (UK) Ltd uses for recruitment will be related to the requirements of the job. Applicants for employment are short-listed/selected solely on the basis of their assessed capability.

The Company is committed to ensuring that no job applicant or employee receives less favourable treatment on the grounds of a protected characteristic (as set out below):-

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or Belief
- Sex
- Sexual Orientation

Each and every employee is a stakeholder in the success of this policy. The Company expects every employee to make a positive contribution towards creating an environment of equal opportunity throughout the organisation by observing this policy at all times. In particular employees have individual responsibility to adopt the following:

- Refrain from pursuing discriminatory actions or taking decisions which are contrary to the spirit of this policy.
- Do not harass, abuse or intimidate anyone on account of their protected characteristics (or otherwise).
- Do not place pressure on any other employee to act in a discriminatory manner.
- Resist pressure to discriminate placed upon you by other employees and report such matters.
- Co-operate with any investigation (including with the provision of evidence) into acts or conduct which may amount to discrimination.
- Co-operate with any measures introduced to develop or monitor equal opportunity.

ICTS (UK) Ltd recognises that discrimination is not just directly treating one person unfavourably or less favourably than another. It can be that discrimination takes place against someone who associates with a person with a protected characteristic. Discrimination can also take place against someone believed to possess a protected characteristic (even if they do not). It can also be discrimination where something particularly disadvantages people who share a protected characteristic, more than others who do not.

It is fundamental to an employee's employment that they treat and are treated by other employees and those who use, or are otherwise associated with the Company, considerately and with respect.

## **4 PROCEDURE**

Any employee or applicant who feels that they have suffered treatment which would be in breach of this policy should raise the matter in accordance with the Company's grievance policy. Any employee who is subject to an allegation that they have acted in breach of this policy, and the allegation is shown to have met the disciplinary process threshold, should be dealt with in accordance with the Company's disciplinary policy

## **5 ROLES AND RESPONSIBILITIES**

### **5.1 Implementation**

The HR Department and management team of each ICTS (UK) Ltd service/site must ensure that all employees and prospective employees are made aware of this policy and the importance of their adherence to it. The Company's Board of Directors must also ensure that a statement encapsulating the spirit and intention of this policy are readily available for public viewing on the ICTS website.

### **5.2 Support, Advice and Communication**

For advice and support in relation to this policy, please contact the ICTS HR Department

## **6 REVIEW**

This policy will be reviewed by the HR Department annually, unless there are any changes to regulations or legislation that would enable a review earlier.

## 7 RELATED LEGISLATION AND DOCUMENTS

Related Legislation:

- The Employment Rights Act 1996
- The Equality Act 2010

Related Policies

- ICTS Disciplinary Policy and Procedure
- ICTS Grievance Policy and Procedure

## 8 APPROVAL AND REVIEW DETAILS

| Approval and Review | Details   |
|---------------------|---|
| Approval Authority  | Matthew Skinner – Company Secretary & Legal Counsel |
| Review Date         | April 2021  |
| Next Review Date    | April 2022  |

| Approval and Amendment History       | Details                  |
|--------------------------------------|--------------------------|
| Original Approval Authority and Date | Lottie Pepler – May 2020 |
| Amendment Authority and Date         | 2021                     |