

## **EQUALITY, DIVERSITY AND INCLUSION POLICY**

### **Policy statement**

Pixelhousegroup and its subsidiary companies are an equal opportunity employer and is committed to a policy of treating all its employees and job applicants equally. The organisation will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

It is the policy the group will take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the 'protected characteristics'. The organisation will appoint, train, develop and promote on the basis of merit and ability alone.

Employees have a duty to co-operate with the organisation to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Action under the organisation's disciplinary procedure will be taken against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of the equal opportunities policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination.

Employees must not harass, bully or intimidate other employees for reasons related to one or more of the protected characteristics. Such behaviour will be treated as potential gross misconduct under the organisation's disciplinary procedure. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Employees should draw the attention of their line manager (or alternative manager whereby the line manager is implicated in this behaviour) to suspected discriminatory or offensive acts or practices. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination or offensive behaviour. Such behaviour will be treated as potential gross misconduct under the organisation's disciplinary procedure. Employees should support staff members who suffer such treatment and are making a complaint.

### **Forms of Unacceptable Behaviour**

#### **Direct discrimination**

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

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Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

The organisation will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

### **Indirect discrimination**

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant or employee. A PCP is discriminatory in relation to a protected characteristic of the job applicant or employee if:

- It is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic,
- The PCP

The organisation will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

### **Victimisation**

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination, or they have given evidence in connection with unlawful discrimination proceedings brought by another employee. However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith. Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

The organisation will take all reasonable steps to eliminate victimisation in all aspects of employment.

### **Offensive behaviour**

Offensive behaviour occurs when an employee feels that the behaviour of another person that they interact with as part of their role is inappropriate. This includes but is not limited to other staff members, consultants, contractors, partners, Trustees, and suppliers.

Whereby a complaint is raised by a member of staff the organisation will take all reasonable steps to investigate and manage the situation to protect an appropriate, respectful, and inclusive environment.

## **Managing Equality, Diversity and Inclusion at Pixelhousegroup and its subsidiary companies**

### **Sources of recruitment**

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The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in respect of abilities and qualifications. The organisation is committed to applying its equality, diversity and inclusion policy at all stages of recruitment and selection.

## Advertisements

Advertisements will aim to positively encourage applications from all suitably qualified people. When advertising job vacancies, in order to attract applications from all sections of the community, the organisation will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic;
2. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of people with a particular protected characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the organisation will apply that requirement to the job role, and this may therefore be specified in the advertisement.

## Selection methods

The selection process will be carried out consistently for all jobs at all levels.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer will be assessed objectively against the requirements for the job.

With disabled job applicants, the organisation will have regard to its duty to make reasonable adjustments to work provisions, criteria or practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

## Selection tests

Any selection tests which are used will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual or inherent ability to do or to train for work or career. Thus, questions or exercises on matters which may be unfamiliar to applicants with a particular protected characteristic will not be included in the tests if they are unrelated to the requirements of the particular job.

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The tests which are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

### **Applications and interviewing**

All applications will be processed in the same way. The staff responsible for short-listing, interviewing, and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

Wherever possible, all applicants will be interviewed by at least two interviewers. All questions that are put to the applicants will relate to the requirements of the job.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

### **Training, transfer and promotion**

The organisation will take such measures as may be necessary to ensure the proper training, supervision and instruction for all line managers in order to familiarise them with the organisation's policy on equal opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity within the departments for which they are responsible. The training will also enable line managers to deal more effectively with complaints of bullying and harassment.

The organisation will also provide training to all employees to help them understand their rights and responsibilities under the organisation's equal opportunities and what they can do to create a work environment that is free from discrimination, bullying and harassment.

All persons responsible for selecting new employees, employees for training or employees for transfer or promotion to other jobs will be instructed not to discriminate because of one or more of the protected characteristics.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory. The promotional system will be checked from time to time in order to assess how it is working in practice.

### **Terms of employment, benefits, facilities and services**

All terms of employment, benefits, facilities and services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

### **Equal pay and equality of terms**

The organisation is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent or work of equal value. In order to achieve this, the organisation will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

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## Grievances and complaints

All allegations of discrimination will be dealt with seriously, confidentially and speedily. The organisation will not ignore or treat lightly grievances or complaints about unlawful discrimination from employees, regardless of the seniority, status or background of the staff members involved. Such complaints should be raised promptly under the terms of the organisation's grievance procedure.

Whereby a complaint is against the line manager and an initial informal grievance is either unsuccessful or not appropriate, the grievance should be raised with a member of the Management Team or HR Advisor for them to advise the best next steps for the issue to be fairly investigated.

It is important that all staff members feel able to raise any issue with confidence that they will be listened to and that appropriate action is taken seriously and as a matter of priority.

Employees will not be penalised for raising a grievance, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

## Monitoring equal opportunity

Pixelhouse Group Ltd will monitor the effects of selection decisions and people practices and procedures in order to assess whether equal opportunity is being achieved, on an annual basis. This will also involve considering any possible indirectly discriminatory effects of its standard working practices. If changes are required, the organisation will implement them. The organisation will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.



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