

# DIVERSITY, EQUITY AND INCLUSION

## OUR EQUAL OPPORTUNITIES POLICY

### December 2021

At Saga plc (the **Company**), we are committed to creating a truly inclusive culture, where all colleagues can bring their full and authentic selves to work, where colleagues are treated with dignity and respect and where there is an environment which is free from discrimination and harassment.

We aspire to have a team that is representative of all sections of society, and for each colleague to feel respected and able to do the best work of their lives while employed with us.

In providing goods and services, Saga is also committed to eliminating unlawful discrimination of customers and the public.

### Purpose

The purpose of this policy is to:

- provide equality, fairness, and respect for all in our employment, whether temporary, part-time or full-time;
- not unlawfully discriminate because of the Equality Act 2010 (the **Act**) protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation;
- oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities;
- assist in developing and encouraging a working environment and culture in which harassment and bullying are known to be unacceptable;
- ensure, as far as is practicable, that colleagues do not behave in a manner which may be offensive to others;
- provide a clear procedure for individuals to make complaints about such behaviour; and
- give colleagues the confidence to deal with such behaviour without fear of ridicule or reprisals.

### Dignity and diversity

Everyone is responsible for treating others with dignity, without unfair discrimination and promoting equality and diversity in all matters.

We aim to provide equal opportunity for all colleagues and the same employment conditions in relation to pay, training and promotion opportunities, regardless of any protected characteristic under the Act, outlined above.

Those recruited into Saga will be selected based on their ability and merits to do the job and fairly assessed against the requirements of the relevant position. Saga will not discriminate unlawfully against any applicants or colleagues on the grounds of any protected characteristic under the Act.

All colleagues are expected to report any breaches of this policy, whether actual or perceived, to their manager, the People Team or confidentially via the Speak Up service.

### Definitions

For the purposes of this policy, bullying, harassment, and discrimination have the following definitions:

**Bullying** may be characterised as offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

**Harassment** is unwanted conduct which violates a person's dignity in the work environment or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may be persistent or an isolated incident and relate to any protected characteristic under the Act. It may include physical contact ranging from touching to assault, verbal and written harassment through personal insults, offensive language, jokes, gossip, visual displays of posters, graffiti, name calling, or other action or comment if viewed as demeaning and unacceptable to the recipient. Harassment, or other less favourable treatment is unlawful.

The person making a complaint relating to bullying or harassment does not have to be the person that the behaviour was directed at.

Examples of potentially unacceptable conduct include:

- spreading malicious rumours;
- ridiculing or demeaning an individual;
- excluding or victimising an individual;
- misusing power or position;
- making unwelcome sexual advances (for example, touching, standing too close, displaying offensive materials);
- making unwanted inappropriate comments via communications platforms (for example, Microsoft Teams, email and Workplace);
- making unwarranted threats about job security; and
- prevention of advancement (for example, blocking promotion or training opportunities).

**Discrimination** is any act which causes an individual to be directly, or indirectly treated less favourably on grounds of personal characteristics under the Act.

Failure to comply with the relevant legislation may render an individual liable to pay compensation or, in certain circumstances, subject to criminal prosecution.

## The Company commits to:

- encourage diversity, equity and inclusion in the workplace at all times;
- create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all and where individual differences and the contributions of all colleagues are recognised and valued.

This commitment includes training managers and all other colleagues about their rights and responsibilities under the diversity, equity and inclusion policy. Responsibilities include colleagues conducting themselves to help the Company provide equal opportunities in employment and prevent bullying, harassment, victimisation, and unlawful discrimination.

All colleagues should understand they, as well as the Company can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment against fellow colleagues, customers, suppliers and the public;

- take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow colleagues, customers, suppliers, visitors, the public and any others in the course of the Company's activities.

Such acts will be dealt with as misconduct under the Company's grievance and/or disciplinary procedures, and appropriate action will be taken.

Serious complaints could amount to gross misconduct and lead to dismissal without notice.

Sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997, which is not limited to circumstances where harassment relates to a protected characteristic, is a criminal offence;

- make opportunities for training, development, and progress available to all colleagues, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Company;
- make decisions concerning colleagues that are based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Act);
- review employment practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law; and
- monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging diversity, equity and inclusion, and in meeting the aims and commitments set out in the diversity, equity and inclusion policy.

Monitoring will also include assessing how the diversity, equity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering to take action to address any issues.

## Procedure for making complaints

There are two options available for resolving a complaint and colleagues may be accompanied by a work colleague or union representative, as appropriate, at any stage of the process.

### Informal procedure

Colleagues may talk informally and in confidence to their manager. At this stage you may decide to progress the matter to a formal procedure. We may be obliged to investigate any allegations, whether the complainant wishes us to do so, in the event of a serious complaint.

Informal ways of pursuing the matter may include:

- talking directly to a colleague who is causing offence and asking them to stop;
- setting out in writing to a colleague causing offence, details of the complaint and asking them to stop; and
- the colleague's manager talking informally to them to outline that their actions are causing distress and must stop and advising that failure to do so may result in a formal complaint, which could lead to disciplinary action. Often this may be sufficient to eradicate the behaviour, as there are times where the colleague is unaware that their actions are causing offence or upset.

### Formal procedure

If the informal procedure feels inappropriate or, having followed the informal route, the formal procedure needs to be considered, colleagues can raise their concerns via a grievance.

For more information on this process, please refer to our Grievance Policy available on the Saga Workplace Knowledge Library.

### Raising concerns anonymously

If colleagues witness behaviour they believe to be discriminatory or unfair, we encourage you to speak to your manager immediately. There may however be situations where this may not be appropriate or where what you've observed may be covered by The Public Interest Disclosure Act (PIDA) 1998. In these situations, you have the right to raise concerns anonymously via the Speak Up Policy. More information on this is available on the Saga Workplace Knowledge Library.

This policy is not intended to prevent or dissuade an individual from contacting the Police and exercising their legal rights where a criminal offence may have been committed.

Use of the Company's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

### Malicious allegations/misuse of the policy

Colleagues making false allegations under this policy or breaching the policy - for example, by failing to keep matters confidential, may be subject to disciplinary action. The outcome of which, may include dismissal.

## Responsibilities

All colleagues:

- are responsible for making their environment one in which everyone is able to work without discrimination, harassment or bullying;
- are expected to challenge any form of discrimination, harassment or bullying; and
- shall take steps to stop the treatment from occurring if they become aware that a colleague is the victim of discrimination, harassment or bullying by reporting it as outlined above.

The Company will:

- by their own example, serve as a role model for colleagues, customers and wider society;
- monitor work areas for evidence of inappropriate behaviour;
- take immediate action to deal with harassment, discrimination or bullying, even if there is no complaint;
- attempt to resolve complaints informally, unless the matter is of a serious nature, if requested by the complainant; and
- provide support, assistance and guidance to affected colleagues.

## Additional information

Should you require any additional support, Be Supported is a confidential integrated online and offline personal support programme giving colleagues unlimited access to a range of specialist support and information.

Login details for Be Supported can be found on Workplace.

## Policy ownership and approval

This policy will be reviewed annually and is owned by the People Team.

## Version control

Version Number	Purpose / Change	Author	Date
1.0	Initial approval	The People Team	December 2021
1.0	Annual Review and Updates	The People Team	December 2022