

## Equal Opportunities, Diversity and Inclusion Policy

### Scope of the Business

This policy covers the scope of all Group Solutions Limited Companies (Kings) including:

- Kings Security Systems Ltd T/A Kings Secure Technologies
- Kings Guarding Solutions Ltd
- East Fire Extinguishers & Alarms UK Ltd T/A E-fire
- Silver UK Ltd T/A Silver Group
- Cougar Monitoring Ltd
- Quidvis Ltd

### Equal Opportunities Policy Guidelines

Group Solutions Limited is an equal opportunity employer and is committed to encouraging equality, diversity, and inclusion among our workforce, and eliminating unlawful discrimination. The purpose of this policy is to ensure all applicants for employment and employees receive fair treatment and are given equal opportunities in all areas of employment. This means that no job applicant or employee receives less favourable treatment on the grounds of age, disability, sex, gender reassignment, marital or civil partner status, pregnancy or maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion, or belief. Neither should they be disadvantaged by conditions or requirements that cannot be shown to be relevant to the job.

Kings' places great emphasis on maintaining procedures that are free from all forms of discrimination.

In promoting the above commitment into practice, Group Solutions Limited aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best, and also recognizes its legal obligations under the Equality Act 2010.

All managers must set an appropriate standard of behaviour, lead by example, and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

The policy's purpose 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 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 in 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.
- Any employee who believes that they may have been disadvantaged on discriminatory grounds should inform their line manager. Matters will be dealt with through the grievance procedure. Breaches of this policy will be dealt with in accordance with our disciplinary procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal without notice.
- The Company commits to:
- Understanding equality, diversity and inclusion in the workplace is good management practice creating a working environment free of harassment, bullying and victimization, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognized and valued. No form of intimidation, bullying or harassment will be tolerated.
- Take seriously complaints of bullying, harassment, victimization and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the company's work activities. We will do our best to protect colleagues from harassment from third parties and any form of negative treatment.
- We won't allow colleagues to wear, display or circulate emblems, badges, clothing, tattoos, posters, images, or literature, where it might create an intimidating, hostile, degrading, humiliating or offensive environment for anyone.
- Reviewing all our employment practices and procedure to ensure fairness and inclusion for all.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### The Law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, gender, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation,

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religion, or belief, or because someone is married or in a civil partnership. These are known as “protected characteristics”. Staff should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability.

The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of the services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

### Forms of Unlawful Discrimination

#### Direct Discrimination

Direct Discrimination is where a person is treated less favorably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

#### Indirect Discrimination

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

#### Harassment

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnerships, and pregnancy and maternity) that has the purpose or effect of violating a person’s dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

#### Associative discrimination

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

#### Perceptive discrimination

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic where they do not in fact, have that protected characteristic (other than marriage and civil partnership and pregnancy and maternity).

#### Third-party harassment

Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as clients or customers. For an employer to be liable:

- The harassment must have occurred on at least two previous occasions (although not necessarily by the same harasser or suffering the same type of harassment).
- It must be aware that the previous harassment has taken place; and
- It must have failed to take reasonable steps to prevent harassment from happening again.

#### Victimisation

This is not the same as the common meaning of victimisation but is specifically regarding treating someone less favourably because they have complained about or given information about discrimination or harassment, either regarding themselves or someone else, or because they are suspected of doing so. However, an employee is not protected from victimization if they acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare their treatment with someone who has not made or supported a complaint under the Equality Act 2010.

**Failure to make reasonable adjustments** is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

### Equal opportunities in employment

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The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy. Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act)

Job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Vacancies and advertisements will avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants will not be asked about health or disability before a job offer is made, except in very limited circumstances allowed by law: for example, to see if any adjustments might be needed at interview because of a disability. Health or disability questions will be included in equal opportunities monitoring forms, which are not used for selection or decision-making purposes.

The company will consider any possible indirectly discriminatory effects of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done when considering request for variations to these standard working practices and will refuse such requests only if the Company considers it has good reasons, unrelated to any protected characteristic, for doing so. The Company will comply with its obligations in relation to statutory requests for contract variations. The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

The Company will monitor the makeup of the workforce regarding information such as ethnic background, gender, sexual orientation, and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

The Company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the Company may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that the Company identifies as being under-represented in particular types of job.

### Dealing with Harassment Complaints

The Company has a separate policy (CPL29) concerning issues of bullying and harassment on any ground, and how complaints of this type will be dealt with.

### Customers, suppliers and other people not employed by the Company

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Employees should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

### Training

The Company will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The Company will provide additional training to managers to enable them to deal more effectively with complaints of bullying and harassment.

### Your responsibilities

We all have a responsibility to behave in a way that is respectful of other colleagues and to understand that our views and opinions may not always be the same as our colleagues.

All staff should understand they, as well as the Company, can be held personally liable for acts of bullying, harassment, victimization, and unlawful discrimination, during their employment, against fellow employees, customers, suppliers and the public. Employees who commit serious acts of harassment may be guilty of a criminal offence.

If you see inappropriate behavior, challenge in a respectful way, or report it. Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

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Acts of discrimination, harassment, bullying or victimization against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimization may constitute gross misconduct and could lead to dismissal without notice.

### Breaches of this policy

Kings takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary and Grievance Procedure and appropriate action will be taken. Serious complaints or cases of deliberate discrimination could amount to gross misconduct and lead to dismissal without notice.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate. You may use the Company's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the dealing with harassment complaints policy.

The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalized for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Disciplinary Procedure.

### Monitoring and review

This policy will be monitored periodically by the Company to judge its effectiveness and will be updated in accordance with changes in the law. In particular, the Company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, the Company will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 2018 and The General Data Protection Regulation (GDPR) 2016.

A handwritten signature in black ink, appearing to read 'Bob Forsyth', is positioned above the printed name and title.

**Bob Forsyth**  
Chief Executive Officer