



Equality, Diversity and Dignity Policy

This document articulates operational and performance guidance for Northgate Information Solutions companies, employees and business partners.

This Policy does not create any contractual rights of any kind between Northgate and its employees. In addition, all employees should understand that this Policy does not modify their employment relationship, whether at will or governed by contract. This Policy is inapplicable to the extent voided or restricted by local law. In the event of discrepancy between a local translation and the English version, the English version will prevail.

	INFORMATION
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Introduction

Northgate Information Solutions ('Northgate') aims to be an employer of choice, for people from different backgrounds and through this policy to promote respect for the individual and equality of opportunity.

Northgate is committed to eliminating discrimination and encouraging diversity. Our aim is for our workforce to be truly representative of all sections of the wider community and for each employee to feel respected and able to give of their best. Northgate promotes being at ease with all aspect of diversity, built on fairness and respect for all.

1. Scope

This policy applies to all employees of Northgate, irrespective of their status and should also be adhered to by everyone who works on our premises or is in a contractual agreement with Northgate including contractors, agency workers, and visitors.

It applies to all aspects of the employee lifecycle, including (but not limited to):

- Selection;
- Recruitment;
- Training;
- Promotion;
- Transfers;
- Pay and benefits;
- Terms and conditions of employment;
- Performance appraisals;
- Termination; and
- All other aspects of the employment relationship.

Employees are also expected to adhere to the policy and behave appropriately at any other work-related setting such as during business travel, at external meetings, on clients' sites, or at work-related social events.

Northgate takes its commitment to equality, diversity and dignity at work seriously. Employees need to be aware that failure to comply with the guidance outlined in this policy is likely to result in disciplinary action, which could include dismissal.

This policy covers Northgate's approach regarding diversity, equality, and dignity. This applies to all employees in Northgate, irrespective of which country the employee is based. There are different legislations across individual countries, so for specific legal information relating to your country, please refer to local policies.

Where the characteristics are legally protected in a country, it is not only against Northgate's policy to discriminate against them, it is also unlawful. Legislation and policies are in place to protect employees as well as potential employees.

2. Our Policy

It is Northgate's policy to create and maintain a supportive working environment in which all employees are treated with dignity and respect and where each employee can contribute their skills to the best of their ability.

People must be treated equally, regardless of their circumstances, irrespective of:

- Age;
- Religion or religious beliefs;
- Race;
- Sex;
- Disability;
- Gender reassignment;
- Marriage or civil partnership;
- Pregnancy and maternity;
- Sexual orientation; and
- Any other characteristic where less favorable treatment is prohibited by applicable law.

Northgate refers to these areas as '**protected characteristics**'.

While promoting diversity makes good sense, it is also legally binding in most countries. Rather than focusing on the detail of legislation in all countries in which Northgate is present, this policy covers all the main areas of impact that are common to most countries.

2.1 Discrimination, Victimization, Harassment and Bullying

This policy prohibits any behavior inconsistent with treating others with dignity and respect, in particular discrimination, victimization, harassment and bullying.

Discrimination, against the 'protected characteristics' includes (but is not limited to):

- Direct discrimination, involving treating a person less favorably than another on the grounds of the protected characteristics;
- Indirect or disparate discrimination, involving discrimination that may also occur when a rule or condition is applied that unjustifiably excludes or disadvantages a person or a group. An example of this would include requiring candidates for director level promotions to have had 20 years of experience. This may have a disproportionately adverse effect on woman who have taken career breaks to have a family.

People should also not be discriminated against where they are perceived to have, or are associated with, someone who is a 'protected characteristic'. For example, someone who is friends with someone with a different religious belief.

Victimization: An individual will be discriminated against if they are treated less favorably because they have made a complaint of discrimination, brought to a Tribunal claim or has assisted someone else in raising such a complaint (for example acted as a witness).

Harassment: This is 'unwanted conduct which has the purpose or effect (regardless of the harasser's intention) of violating a person's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment for them'. Harassment may be persistent or it may result from an isolated incident. It may be directed towards one individual or a group of individuals.

The key point about harassment is that it is behavior which is unwelcome from the point of view of the recipient. This means that it is the impact on the recipient which will determine whether the behavior amounts to harassment, not the intent of the alleged harasser. Behavior may amount to harassment if it is unacceptable to one employee, even if other employees do not object.

Bullying: This conduct stands for offensive, intimidating, malicious, insulting or humiliating behavior, or abuse of power or authority, which attempts to undermine an individual or group of individuals and which may cause them to suffer stress. Bullying can take many forms, may be carried out in a concealed way, and may involve a course of conduct over some time.

An example of bullying would be deliberately humiliating an employee in front of other employees.

2.2 Rights of Individual Employees

Every employee of Northgate has the right to work in an environment free from any form of discrimination, victimization, harassment and bullying. This includes protection from work colleagues, clients and customers. Northgate recognizes fully the right of employees to complain should it occur, and all complaints will be dealt with seriously and confidentiality.

Employees have the right to complain through formal or informal procedures, set out in local policies. Every effort will be made to ensure that employees making complaints of discrimination, victimization, harassment and bullying and others who give evidence or information in connection with a complaint, will not be victimized. Any complaint of victimization will be dealt with seriously and confidentiality.

3. Responsibilities of All Employees

It is the responsibility of everyone who works at Northgate to help create a working environment free from discrimination, victimization, harassment, and bullying.

Employees should be aware that if they commit any act of discrimination (against the 'protected characteristics'), victimization, harassment or bullying, this is likely to result in disciplinary action up to and including dismissal. In addition, employees who participate in such behavior may also face both civil and criminal liability.

4. Additional Responsibilities of Managers

Managers are responsible for fulfilling the company's aim to provide a supportive working environment for all. Managers must therefore ensure that their work environments are free from unlawful discrimination, harassment and bullying if any kind.

If a manager is in any doubt about how they should handle a potential issue that may involve discrimination, victimization, harassment or bullying, they should contact their HR representative at the earliest opportunity.

5. How to Raise a Complaint

Northgate recognizes that employees may be uncomfortable about raising their concerns and, in particular, about being drawn into a formal procedure and therefore Northgate seeks to ensure that employees are fully supported when they wish to raise such issue. Northgate has in place a Whistleblowing policy to handle matters on a confidential basis.

Local offices can have their own policies regarding raising a complaint, however in most cases the first step is for the employee to raise the complaint verbally or in writing with their line manager. In situations where the line manager is the person the complaint is being raised about, the complaint must be raised with their manager's manager or Human Resources.

Complaints should be raised as soon as possible following an act of alleged harassment, bullying and/or unlawful discrimination so that the matter can be fully investigated and dealt with in an appropriate manner.

5.1 False and Malicious Accusations

Our priority is to ensure that those who suffer from discrimination, victimization, harassment or bullying are able to obtain support and guidance in resolving their issue. Employees who raise complaints will be protected from work-related retaliation by the company, provided that complaints are made in good faith. If, however, there is evidence that a complaint has been raised on grounds that the person making the complaint knows to be false, or raises a complaint maliciously, the individual making such complaint (and anyone assisting this person) will be subject to disciplinary action, which may lead to dismissal.

6. Monitoring and Learning

The company regularly carries out a monitoring process to measure the diversity of our workforce and to make sure that the diversity policy is being respected.

Training and awareness is provided through Northgate's e-learning system for all new joiners, and on an annual basis for all employees.