PARAMOUNT SECURITY SOLUTIONS LTD

EQUALITY & DIVERSITY POLICY

October 2025

1. EQUALITY & DIVERSITY POLICY

This **Equal Opportunities and Diversity Policy** (also called the Equality and Diversity Policy) has been written in accordance with current best practice and has been drafted in line with the Equality Act 2010.

Under the Equality Act 2010, employers may utilise positive action in recruitment and promotion. 'Positive action' means the steps that an employer can take to encourage people from groups with different needs, or with a past record of disadvantage or low participation, to apply for jobs. Employers are permitted, not required, to take positive action. One of the conditions of the positive action provisions is that employers must not routinely treat people with a protected characteristic more favourably: it must be used only in tie-break situations.

The Equality Act 2010 also makes it unlawful for a company to discriminate against anyone on the grounds of race, sex, pregnancy and maternity, marriage or civil partnership status, gender reassignment, disability, religion or belief, age, or sexual orientation. It is also possible for employees to claim for discrimination on a combination of two of these grounds. Similarly, if an employee discriminates against a colleague or customer, the Company could be held vicariously liable for their acts, and be responsible for paying the compensation or damages to the victim of the discrimination.

If a Company can prove that it has done all that was reasonable to prevent the discriminatory acts from occurring then its liability can be reduced or entirely eliminated. Having an equality policy and apprising all staff of its existence is one of the things that a reasonable employer should do.

2.0 Purpose

Paramount Security Solutions Ltd is committed to promoting equality and diversity and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work. Paramount Security Solutions Ltd aims to be an inclusive organisation, where diversity is valued, respected and built upon, with ability to recruit and retain a diverse workforce that reflects the communities it serves. Within this framework the Company specifically refers to measures it has in place to provide equality of opportunity and the facilities that it can provide to its diverse workforce and job applicants.

Paramount Security Solutions Ltd is also committed to compliance with relevant equality legislation, the Equality Act 2010, Codes of Practice and relevant best practice guidance. This policy pursues and builds on the statutory position to ensure effective policies and practice of promoting equality.

Paramount Security Solutions Ltd aims to pro-actively tackle discrimination or disadvantage and aims to ensure that no individual or group is directly or indirectly discriminated against for any reason with regard to employment or accessing its services.

However, Paramount Security Solutions Ltd is also mindful of the provision in discrimination law for the rare circumstances when an organisation may need to justify discrimination rather than have a disproportionate effect. This could be, for instance, where there is a conflict with other legislation that Paramount Security Solutions Ltd has to comply with or between service needs. In such circumstances the Company is committed to following the required proper assessment and objective justification of any decision in order to demonstrate that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

Issues regarding harassment and bullying are covered in the Harassment, Bullying and Discrimination Policy. For issues regarding recruitment refer also to the Recruitment policy.

2.1 The Definition of Equality and Diversity

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment, and to goods and services; the basis of which is supported and protected by legislation.

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for the Company.

Equality and Diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed and taken account of.

2.2 Scope

This policy applies to direct employees of Paramount Security Solutions Ltd, workers (engaged through, or by, an employment agency or bureau and supplied to the Company on a temporary basis), and all job applicants regarding recruitment.

Where Paramount Security Solutions Ltd's services are provided by external contractors or third parties on the basis of a specification set by Paramount Security Solutions Ltd, these contractors or third parties are responsible for adhering to the Company's Equality and Diversity Policy whilst providing services on behalf of the Company.

This policy applies also to sub-contractors Paramount Security Solutions Ltd will monitor the performance of contractors and/or third parties and take all necessary steps to ensure good performance and compliance with appropriate behaviours. However, if any issues become apparent with regards to diversity or equality in relation to any contractor or third party, these will be taken very seriously by Paramount Security Solutions Ltd and raised in the strongest possible terms with the contractor or third party.

2.3 Policy statement

Paramount Security Solutions Ltd is committed to ensuring that existing members of staff, job applicants, or workers are treated fairly in an environment which is free from any form of discrimination with regard to nine protected characteristics as outlined by the Equality Act 2010 which are:

- Age
- Disability

- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (includes colour, nationality and ethnic origins)
- Religion and or belief
- Sex
- Sexual orientation

In addition, existing members of staff, job applicants, or workers are treated fairly in an environment which is free from any form of discrimination with regard to: caring responsibilities, part-time employment, membership or non-membership of a trade union or spent convictions.

All employment-related policies, practices and procedures are applied impartially and objectively; equality of opportunity extends to all to provide staff with the opportunity to develop and realise their full potential; the Company works towards achieving a diverse workforce at all levels so that employees of Paramount Security Solutions Ltd can work in an atmosphere of dignity and respect.

Paramount Security Solutions Ltd will not tolerate processes, attitudes and behaviour that amounts to direct discrimination, associative discrimination, discrimination by perception, indirect discrimination including harassment (harassment by a third party), victimisation and bullying through prejudice, ignorance, thoughtlessness and stereotyping.

Paramount Security Solutions Ltd recognises the importance of monitoring, reviewing and reporting on its Equality and Diversity policy and practice and to measure progress in meeting our policy statement.

2.4 Practical support for a diverse workforce

As an employer committed to diversity and equality Paramount Security Solutions Ltd recognises its success depends on creating a working environment which supports the diverse make-up of its staff with supporting policies and procedures to create a framework of assistance.

Paramount Security Solutions Ltd's Equality Impact Assessment policy also sets out the process for ensuring Paramount Security Solutions Ltd takes account of equality considerations which affect its staff and try to minimise or remove disadvantage.

2.5 Work/Life balance

Paramount Security Solutions Ltd is committed to employees who have commitments outside work, irrespective of whether they have caring responsibilities. Paramount Security Solutions Ltd is committed to helping its employees fulfill their potential at work whilst finding the right work/life balance by offering a Flexible Working Hours Scheme and opportunities to job share where appropriate.

Paramount Security Solutions Ltd aims to improve the working lives of its employees by having a framework of policies such as the Statutory Right to Request Flexible Working, Special Leave to help with caring responsibilities and domestic emergencies and Career Breaks.

Paramount Security Solutions Ltd is committed to supporting employees with family commitments such as offering family-friendly initiatives as a flexible way to meet childcare costs.

2.6 Review and Monitoring

Paramount Security Solutions Ltd undertakes monitoring that not only meets statutory requirements but also aims for best practice. This is used to inform and improve our employment practices. If through monitoring any discrimination is identified the Company will take corrective action to eliminate it.

The monitoring of Paramount Security Solutions Ltd workforce is produced across all areas of employment practice and is discussed at the Equality and Diversity Working Group composed of management and the Trade Union Side, and by the various Action groups.

Such monitoring will be carried out using appropriate statistical analysis, and would normally deal with areas such as race, disability, gender, and age and ensure compliance with legislation. Any resultant statistics and analysis will be kept by the Human Resources Directorate and shared with the trade unions.

In addition, the Staff Survey is conducted regularly in order to gain the views of all employees and includes a section on diversity and the working environment. Paramount Security Solutions Ltd will use the information from the Staff Survey to measure its record on meeting our equality and diversity policy aims.

Paramount Security Solutions Ltd may also be required to report the progress on equality and human rights to the Equality and Human Rights Commission.

2.7 Communication

Please contact the Managing Director if you require a copy of Equality and Diversity Policy.

The details of this policy will be proactively communicated and promoted to all current staff and new starters.

2.9 Discrimination

Discrimination may take seven main forms and is defined in law along with the protective characteristics associated with each provision as listed below:

Direct Discrimination occurs when someone is treated less favourably than another person because of a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy and maternity. For example, a supervisor does not select a pregnant woman for promotion even through they meet all of the competencies because they are pregnant. This is probably direct discrimination and cannot be justified.

Associative discrimination occurs when someone discriminates against someone because they associate with another person who possesses a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a supervisor does not give a job-applicant the role, even though they have met all of the competencies for the role, just because the applicant tells the employer they have a disabled partner. This is probably associative discrimination because of disability by association.

Discrimination by perception occurs when someone discriminates against an individual because they think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a supervisor selects a person for redundancy because they incorrectly think they have a progressive condition (i.e.

that they are a disabled person). This is probably discrimination by perception because they believe the individual is disabled.

Indirect discrimination occurs when a seemingly neutral provision, criterion or practice that applies to everyone places a group who share a characteristic e.g. type of disability at a particular disadvantage. Indirect discrimination may be justified if it can be shown that the provision, criterion or practice is a proportionate means of achieving a legitimate aim. An example of this is when an employer decides to apply a "no hats or headgear" rule to staff. If this rule is applied in exactly the same way to every member of staff, then staff who may cover their heads as part of their religion or cultural background (such as Sikhs, Jews, Muslims and Rastafarians) will not be able to meet this requirement of the dress code and may face disciplinary action as a result. Unless the employer can objectively justify using the rule, this will be indirect discrimination. Relevant protected characteristic include age, marriage and civil partnership, race, religion or belief, sex and sexual orientation. In addition, the Act extends protection against unjustified indirect discrimination to gender reassignment and disability.

Dual Discrimination occurs when someone is treated less favourably because of a combination of two relevant protected characteristics. This means that it will be possible for an applicant to claim that they have been treated less favourably not just because of their race but also because of their gender. For example, because the individual is an Asian woman. Relevant protected characteristic include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation. (At present this new concept has not been implemented).

Detriment arising from a disability arises when you treat a disabled person unfavourably because of something connected with their disability. This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably expected to know, that the person had a disability. This type of discrimination is only lawful if the action can be justified and the employer can show that is a proportionate means of achieving a legitimate aim. An example of this when an employer imposes a "no beards" rule as a part of a dress code and tells staff they will be disciplined if they do not comply. The employee is a disabled person who has a skin condition which makes shaving very painful. They have been treated unfavourably (threat of disciplinary action) because of something arising from their disability (their inability to shave). Unless the employer can objectively justify the requirement, this may be a detriment arising from a disability. It may also be a failure to make a reasonable adjustment.

Victimisation occurs when an employer is treated unfavourably, disadvantaged or subjected to a detriment because they have made or supported a complaint of discrimination or raised a grievance under the Equality Act, this policy or the Harassment, Bullying and Discrimination policy or because they are suspected of doing so. (However, an employee is not protected from victimisation if they have maliciously made or supported an untrue complaint). An example, of this is when an employee requests to work flexibly and their supervisor refuses their request because they supported a colleague in a complaint of discrimination.

Third party harassment occurs when an employee is harassed by someone who does not work for the employing organisation, such as a customer, visitor, client, contractor or visitors from another organisation. The employer will become legally responsible if they know an employee has been harassed on two or more occasions by someone and it may also be different individuals each time and fails to take reasonable steps to protect the employee from further harassment.

2.10 Complaints of Discrimination

Paramount Security Solutions Ltd takes all claims of discrimination very seriously and will take appropriate action against those concerned. Discrimination occurs when someone directly or indirectly treats a person or a group of people unfavourably because of a protected characteristic of age, disability,

gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. This covers all behaviour including remarks and insinuation, both verbal and non-verbal, which cause offence.

Any member of staff who is subject to harassment, bullying or discrimination is encouraged to refer to Paramount Security Solutions Ltd's policy on Harassment, Bullying and Discrimination. This provides details of the steps that can be taken to deal with such an issue. In addition, staff are reminded that they can obtain external, confidential help if they so wish by contacting the Company's Employee Assistance Programme, and/or their Trade Union Representative.

If a worker (engaged through, or by, an employment agency or bureau) considers they have been discriminated against they should raise their complaint directly with their employer.

2.11 People Strategy and Corporate Social Responsibility

Paramount Security Solutions Ltd aims to be an employer of choice and through its People Strategy aims to ensure its workforce are able to make a valuable contribution to the work of Paramount Security Solutions Ltd whilst ensuring we support our workforce's health and well-being of the workforce.

The HR strategy is linked to the Company's Corporate Social Responsibility (CSR) strategy which is to have a positive impact within the local, national and international communities. One of Paramount Security Solutions Ltd's CSR aims is to improve the quality of life for our workforce, families and the local community.

Where appropriate, Paramount Security Solutions Ltd actively encourages its employees to participate in local voluntary initiatives and may provide further support to initiatives, which encourage social inclusion in Paramount Security Solutions Ltd's local communities. This may involve, for example, participation in literacy schemes or employees acting as mentors to local school children and volunteering opportunities. The Company's Corporate Social Responsibility intranet site can provide further details on these initiatives.

2.12 Responsibility

All staff have a responsibility to guard against any form of discrimination and avoid any action which goes against the spirit of this policy. Thus staff at all levels must ensure that there is no discrimination in any of their decisions or behaviour. This includes the provision that all staff must:

- Report any suspected discriminatory acts or practices.
- Not induce or attempt to induce others to practice unlawful discrimination.
- Co-operate with any measures introduced to ensure equality of opportunity.
- Not victimise anyone as a result of them having complained about, reported or provided evidence of discrimination.
- Not harass, abuse or intimidate others.

However, whilst all staff have a collective responsibility to ensure this policy is successfully implemented, there are also specific responsibilities within this.

The Managing Director and Supervisoris responsible for:

- Providing leadership on the equality and diversity strategy and policy, acting as overall champions to ensure the policy is implemented;
- Communicating the strategy and policy, internally and externally;

- Strategic engagement with and accountability to the DCMS and the public.

- Implementing the policy as part of their day-to day management of staff and in applying employment policies and practices in a fair and equitable way
- Ensuring equality and diversity issues are addressed in performance.
- Ensuring all staff act in accordance with the equality and diversity policy providing necessary support and direction;
- Effectively manage and deal promptly when investigating issues relating to potential discrimination, including those matters concerning members of the general public who visit the British Company;
- Ensuring all policy or service decisions that will change provisions, practices or policies and affect the workforce are Equality Impact Assessed as required. For further information refer to the Equality Impact assessment policy.

Each employee is responsible for:

- Implementing the policy in their day-to-day work and their dealings with colleagues, readers and visitors

- Ensuring their behaviour is appropriate to the policy and that they treat people with respect and dignity;
- Not discriminating against other employees or service users
- Notifying her/his supervisor of any concerns with regard to the conduct of other employees, service users, the public or third parties.

Ed Githaiga
Managing Director
October 20th 2025