

Our Equal Opportunities Statement & Policy



The copyright of this document is vested in Kao Data. This document may only be reproduced in whole or in part, or stored in a retrieval system, or transmitted in any form, or by any means electronic, mechanical, photocopying or otherwise, with the prior permission of Kao Data

Located on SharePoint: IMS: Procedures

Controlled Document: 000

Kao Data Campus Locations

- London Road, Harlow, CM17 9NA
- Galvin Road, Slough, SL1 4AN
- Rowdell Road, Northolt, UB5 6AG



Document Change History

Version No.	Date Issued	Update Details	Issued by	Approved by
V0.1	16/05/2022	Initial Draft Version	Joanna Breen	Gary Kilmister
V0.2	20/05/2022	Review and updates update	Gary Kilmister	Joanna Breen
V0.3	22/08/2022	Review and sign off	Gary Kilmister	Paul Finch Lee Myall
V1.0	24/08/2022	Published version	Gary Kilmister	Gary Kilmister
V1.1	10/07/2023	Minor amendment made to footer to remove reference to ISO standards	Katie Harper	Gary Kilmister
V1.2	14/07/2023	Annual Review - no changes required	Gary Kilmister	Jo Breen
V1.3	02/08/2023	Submitted for review, approval and sign off – Retained as v1 as no content changes made	Gary Kilmister	Paul Finch Lee Myall
V1.4	03/08/2023	Re-Published version (signed off)	Gary Kilmister	Gary Kilmister

Distribution List

Copy Number	Job Title / Purpose	Location
000	Master	SharePoint
001	Site Copy – Displayed	Harlow Breakout Room
002	Site Copy – Displayed	Slough Notice Board
003	Site Copy – Displayed	Northolt Notice Board

Document Title:	Equal Opportunities Statement & Policy	THE BOOK MENT IS UNICONTROLLED	Review Date:	03/08/2023
Version Number:	V1	THIS DOCUMENT IS UNCONTROLLED	Classification:	Internal
Document Owner:	Compliance / HR	IN HARD COPY FORMAT	Page No.	Page 2 of 5

DocuSign Envelope ID: 6527839C-C603-48F4-B4A9-02AF5A852125 Our Equal Opportunities Statement & Policy



Contents

2	Purpose	2
	Applicability	
4	Policy	2
5	Sign off	5

DocuSign Envelope ID: 6527839C-C603-48F4-B4A9-02AF5A852125

• ID: 6527839C-C603-48F4-B4A9-02AF5A852125 Our Equal Opportunities Statement & Policy



2 Purpose

Kao Data is an equal opportunity employer.

The Company is committed to being a successful, caring and welcoming place for all employees. We want to create a supportive and inclusive environment where our employees can reach their full potential, without prejudice and discrimination. We are committed to a culture where respect and understanding is fostered, and the diversity of people's backgrounds and circumstances will be positively valued.

Equality of opportunity, valuing diversity and compliance with the law is to the benefit of all individuals in our Company as it seeks to develop the skills and abilities of its people. While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect.

Through this policy and procedure and the training and development of managers and staff, the organisation will do all it can to promote good practice in this area in order to eliminate discrimination and harassment as far as is reasonably possible. The Company will also continue to work towards its dedicated goal of encouraging and promoting equality and diversity within the workforce.

3 Applicability

This policy is applicable to all stakeholders, employees, and directly employed contractors working for Kao Data.

4 Policy

The policy aims to achieve equality by removing any potential discrimination in the way that our employees are treated by fellow employees or the Company, including:

- people with disabilities
- people of different sexual orientations
- transgendered and transsexual people
- people of different races
- people on the grounds of their sex
- those of faith and of no faith
- in relation to their age
- in relation to their social class or medical condition
- people who work part-time
- those who are married or in a civil partnership
- women who are pregnant, have recently given birth or are breastfeeding.

Discrimination can be either direct or indirect discrimination. Some of the above are protected characteristics under the Equality Act 2010 and discrimination is prohibited, unless there is a legal exception under the Equality Act.

A) Direct discrimination

This is where someone is treated less favourably due to one (or more) protected characteristics. It can be intentional or unintentional discrimination. Occasionally the discrimination may occur due to a protected characteristic of another person, so the discrimination may be because of association. An example is an advert for a job that requires 'men only' or 'under 30s only'.

Document Title:	Equal Opportunities Statement & Policy	THIS DOCUMENT IS UNCONTROLLED	Review Date:	03/08/2023
Version Number:	V1	THIS DOCUMENT IS UNCONTROLLED	Classification:	Internal
Document Owner:	Compliance / HR	IN HARD COPY FORMAT	Page No.	Page 4 of 5

e ID: 6527839C-C603-48F4-B4A9-02AF5A852125 Our Equal Opportunities Statement & Policy



B) Indirect discrimination

This is where someone is disadvantaged by an apparently neutral provision, criterion, or practice (PCP) that is applied 'across the board' or 'equally across a particular group'. The PCP may have the consequence (usually unintended) of causing a disadvantage, which then actually affects somebody. For example, a PCP relating to clothing or headwear could be applied 'equally' but may cause someone with a protected characteristic to be disadvantaged. The PCP could be justified if it is a proportionate means of achieving a legitimate aim.

C) Victimisation

This is different from 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.

D) Harassment

This is part of the Equality Act but is covered in more detail in the Harassment policy.

The Equality Act 2010 applies to how employees treat fellow employees, visitors, suppliers, and former employees. The Act also applies to customers/clients.

The Company is committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination.

The aim of this policy is to ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.

The personal commitment of every employee to this policy and application of its principles are essential to eliminate discrimination and provide equality throughout the Company.

Training, development, and progression opportunities are available to all staff.

The Senior Management Team (with the support of Human Resources and the Compliance Director) have particular responsibility for implementing and monitoring the equality and diversity policies and, as part of this process, all personnel policies and procedures are administered with the objective of promoting equality of opportunity and eliminating unfair or unlawful discrimination.

There will be monitoring and reviews of the effectiveness of the equal opportunities policy, including a review of job applicants and the benefits/career progression of existing employees. Comments and suggestions on the policy can be directed to Human Resources or the Compliance Director.

5 Sign off

Signed Signed



Lee Myall Chief Executive Officer, Kao Data Published: August 2023 Paul Finch Chief Operating Officer, Kao Data Published: August 2023

DocuSigned by:

Paul Finch

F3849356F76B49B

Document Title:	Equal Opportunities Statement & Policy	THE DOCUMENT IS UNCONTROLLED	Review Date:	03/08/2023
Version Number:	V1	THIS DOCUMENT IS UNCONTROLLED	Classification:	Internal
Document Owner:	Compliance / HR	IN HARD COPY FORMAT	Page No.	Page 5 of 5