

Purpose and Scope

We are committed to the principle of equal opportunities in employment. We are opposed to any form of less favourable treatment or financial reward through direct or indirect discrimination, harassment, victimisation to employees or job applicants on the grounds of race, religious beliefs, political opinions, creed, colour, ethnic origin, nationality, marital/ parental status, sex, sexual orientation or disability and to any form of less favourable treatment on the grounds of handicap or age.

This policy relates to all parts of GBM, and covers all actions and activities carried out as part of our operational activity. GBM recognises that it has a responsibility to take a robust approach to ensuring equality and diversity in the workplace - and within our wider supply chain.

Organisational Structure

This statement covers all companies in our group, including: GBM Digital Technologies Group Holdings Limited, GBM Digital Technologies Group Limited, GBM Digital Technologies Holdings Limited, GBM Digital Technologies Limited (trading as Sync), and Kingsfield Computer Products Limited.

GBM Digital Technologies Limited trading as Sync (company reg: 02719704) is a wholly owned subsidiary of GBM Digital Technologies Holdings Limited (company reg: 07355195), which, along with Kingsfield Computer Products Limited (company reg: 3357539) in turn is a subsidiary of GBM Digital Technologies Group Limited (company reg: 12470566), which is a wholly owned subsidiary of GBM Digital Technologies Group Holdings Limited (company reg: 14306747).

Both Sync and Kingsfield are ICT hardware and software resellers, and services providers. Both companies provide technology-oriented products and services to businesses, educational establishments, charities, and public sector bodies. Sync and Kingsfield operate in the UK only, and supply within the UK and EU only.

Commitment to Equality and Diversity

We recognise our obligations and commit to maintaining compliance with the Equality Act 2010, and the Codes of Practice as published by the Equality and Human Rights Commission (EHRC):

- for the elimination of discrimination on the grounds of sex, sexual orientation or marital status and for the promotion of equal opportunity in employment;
- for the elimination of discrimination on the grounds of religion or beliefs;
- for the elimination of racial discrimination and the promotion of equal opportunity in employment;
- for the elimination of discrimination on grounds of age;
- for the elimination of discrimination in pay based on gender
- for the elimination of discrimination on the grounds of disability and the promotion of accessibility and reasonable adjustments in the workplace;
- for the provision of equal treatment and opportunities to pregnant employees and those on maternity/paternity leave, ensuring protection from discrimination;
- for the commitment to promoting equality and preventing discrimination in respect of gender reassignment, supporting the dignity of all employees during transition periods;
- for the assurance of fair treatment and equal opportunities regardless of race, including nationality and ethnic or national origins;

- for the fostering of an inclusive culture where diversity is respected and valued, free from harassment and victimisation on any grounds;
- for the active role in promoting a balance of work and personal life, considering the needs of employees with caring responsibilities.

Relevant Policies

GBM operates the following policies that describe its approach to the identification and prevention of discrimination in its operations:

- Equal Opportunities Policy
- Wages, Salaries, and Benefits Policy
- Training Policy
- Mandatory Training Requirements Policy
- Employee Code of Conduct (per Employee Handbook)
- Whistleblowing Policy
- Supplier Management Policy

Supplier Management and Due Diligence

Our supply chains are non-complex, and typically fall in to one of two models:

- Purchasing directly from the manufacturer
- Purchasing from a distributor, who is authorised to distribute goods and services on behalf of the manufacturer

We operate a robust supplier management system, ensuring that all suppliers are fully vetted prior to onboarding, and regular ongoing maintenance and review checks are undertaken. Where issues or concerns are recorded against our suppliers or contractors, we will take appropriate action as required to resolve the issues, which can include:

- Applying sanctions to the supplier or contractor, or putting them under special measures

- Limiting the scope, region, or value of works provided to the supplier or contractor
- Providing the supplier or contractor with a training or improvement plan, or a set of requirements prior to continuing works
- Suspending the supplier or contractor from use
- Terminating the relationship with the supplier or contractor

Employment Practices

All employees have a personal responsibility to adhere to the principles of equal opportunity and maintaining racial harmony. We will actively promote equal opportunities in our business to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. Employees will be recruited and selected, promoted and trained on the basis of objective criteria. Sexual, racial and other forms of harassment will not be tolerated. We will treat unfair discriminatory conduct by any member of staff as a disciplinary offence.

Opportunities for Development

We will train, develop and promote on the basis of merit and ability and encourage employees and applicants from all races.

Equal Pay

All individuals, regardless of gender, are entitled to equal pay without bias, as stipulated by UK Law. This right, rooted in the principles of the Equality Act 2010, is fully enforceable within the United Kingdom. We are committed to taking all reasonable steps to ensure that all staff receive equal pay for the same work, for work rated as equivalent, and for work of equal value.

Rehabilitation of Offenders

We will not discriminate against anyone who has a spent conviction under the Rehabilitation of Offenders Act 1974.

Harassment at Work

Harassment is unsolicited and unwelcome workplace behaviour that adversely affects the dignity of the recipient. Where such behaviour is motivated by gender, sexual orientation, marital status, race, national or ethnic origin, nationality, age, or disability it also amounts to infringement of equal employment opportunity.

We are committed to ensuring that no harassment or victimisation at work, whatever the motivation, is over-looked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing colleagues or subordinates.

Resolving Harassment

We will work to resolve the complaint of harassment sensitively, impartially, effectively and quickly. Where a harasser is retained in employment, the Company will monitor the situation to ensure that the harassment has stopped. It is a disciplinary offence to victimise or retaliate against an employee who has, in good faith, made, supported or assisted in the making of a complaint of harassment. There will be no victimisation of any employee for making or supporting or assisting a complaint of harassment - even if the complaint is not upheld - provided the action was taken in good faith.

Grievance and disciplinary procedures

We will ensure that any employee who feels that they have been treated unfairly or subjected to direct or indirect unfair

discrimination can raise the matter through the appropriate grievance procedure when every effort will be made to secure a satisfactory resolution. Any employee making a complaint of unfair discrimination will be protected from any victimisation in any form.

Training and Competence

GBM requires that all staff complete Equality, Diversity, and Inclusion (EDI) training on induction, and on a regular basis. This covers:

- Why EDI is important
- The law, and lawful and unlawful discrimination
- Employer and personal responsibilities
- How to be more equality, diversity, and inclusion aware
- Good practice to help employees meet their responsibilities

Our training is designed to provide all employees with an understanding of the key principals of EDI, our policies and processes relating to EDI, and promote good EDI practices within the business.

Legal and Regulatory Compliance

We will comply with all relevant legal and regulatory requirements related to our business functions and operations.

Communication and Documentation

We will maintain effective communication channels with our clients, employees, and stakeholders. We will also ensure that all relevant management documentation is accurate, up-to-date, and accessible to those who need it.

Monitoring and review arrangements

We will regularly monitor our policies to ensure that we pursue an effective policy of equal opportunity.