



Equality, Diversity, Human Rights and Labour Standards (including Anti-slavery, Human Trafficking and Child Labour) Policy

2024

Greg Wood	Chief Executive Officer	25th March 2024

Illuminet – Equality, Diversity, Human Rights and Labour Standards (including Anti-slavery, Human Trafficking and Child Labour) Policy

Introduction

Illuminet's commitment to fostering equality, diversity, and inclusion is outlined in this policy aimed at eliminating unlawful discrimination across our workforce, stakeholders, customers, and third-party suppliers.

This commitment extends to complying with applicable laws and regulations in the countries of our operations, with a particular emphasis on preventing slavery, human trafficking, and child labour.

Purpose of this policy

This Policy's purpose is to Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time.

Illuminet will not unlawfully discriminate the 'protected characteristics' as defined in the UK Equality Act 2010:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Illuminet will take all reasonable steps to ensure that we and our staff do not unlawfully discriminate under:

- Employment Rights Act 1996
- Human Rights Act 1998
- Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Civil Partnership Act 2004
- Work and Families Act 2006
- Equality Act 2010
- Race Relations Act 1976
- Modern Slavery Act 2015
- Employment of Children Act 1973
- Sex discrimination act 1975
- Equal Pay act 1970
- the Rehabilitation of Offenders Act 1974
- Disability Discrimination Act (DDA) 1995 and;
- any other relevant legislation in force from time to time or subsequently

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introduced and the equivalent legislation in countries within which we operate relating to discrimination.

Who is responsible for this policy?

The Chief Executive Officer is responsible for providing advice and guidance on equality and diversity issues, and to ensure the Policy document is kept up to date. The Leadership team (ExCo) and extended Leadership team (Management) have the responsibility of ensuring the policy is adhered to.

The Policy applies to individuals in scope, including employees directly employed by Illuminet, to workers employed via agencies, contractors in terms of employment, trustees, and customers in terms of service provision.

All employment must be in compliance with all applicable laws and regulations of the countries in which Illuminet operates.

Company Policy

Illuminet commits to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not

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limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability 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.

Anti-Slavery, Human Trafficking and Child Labour

Illuminet strictly prohibits the use of modern slavery, child labour or human trafficking in our operations and third parties. We have and will continue to be committed to implementing systems and controls aimed at ensuring these practices do not take place anywhere within our organisation or in any of our third parties. We expect that our third parties will hold their own third parties to the same high standards.

- We have a zero-tolerance approach to modern slavery in our organisation and our third parties.
- The prevention, detection and reporting of modern slavery in any part of our organisation or third parties is the responsibility of all those working for us or on our behalf.
- We do not employ or utilise in any manner any individual below the minimum employment age set by national law or by International Labour Organisation Convention 138.
- Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this Policy.
- Consistent with our Policy we may require third parties to our organisation to confirm their compliance with relevant laws.
- Workers are advised to notify a member of the company Exco immediately they have any concern, whether internal to the company or across their third parties, notifying either directly or via the Whistleblowing process so that the Company can take

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appropriate action.

If we find that other individuals or organisations working on our behalf have breached this Policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

The Board shall regularly monitor and evaluate the effectiveness of this Policy in achieving the stated aims. This process shall be undertaken at least annually, shall include the review of each component of the Policy, and shall aim to seek the views of organisations representing the interests of those groups referred to in this Policy.

Complaints and Sanctions

Employees, Clients, or other third parties should draw the attention of the CEO or follow the Whistleblowing Policy when there are suspected discriminatory acts, or cases of bullying and harassment. Action will be taken where appropriate.