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DB Rail Solutions

Equal Opportunities and Diversity Policy

Effective May 21st 2025

DB Rail Solutions Ltd
Unit 1 & 2 Ace Business Park,
Burley Close, Chesterfield,
United Kingdom, S40 2WL
Company Number: 16145208

1. INTRODUCTION

- 1.1. DB Rail Solutions Ltd (Company) is committed to providing a working environment in which personnel are able to realise their full potential and to contribute to its business success irrespective of their gender, race, disability, sexual orientation, marital status, part time status, age, religion or belief.
- 1.2. This is a key value to which all personnel are expected to give their support.
- 1.3. To create conditions in which this goal can be realised, the Company is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the Company. The Company expects all personnel to support this commitment and to assist in its realisation in all possible ways.
- 1.4. Specifically, the Company aims to ensure that no personnel or candidate is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital or civil partnership status, part time status, age, religion or belief, pregnancy or maternity, or sexual orientation. This commitment applies to all aspects of contracted works, including:
 - 1.4.1. recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
 - 1.4.2. training.
 - 1.4.3. promotion and career development opportunities.
 - 1.4.4. terms and conditions of contracted works, and access to DBR related benefits and facilities.
 - 1.4.5. grievance handling and the application of disciplinary procedures; and
 - 1.4.6. selection for redundancy.
- 1.5. Equal opportunities practice is developing constantly, as social attitudes and legislation change. The Company will keep its policies under review and will implement changes where these could improve equality of opportunity. This commitment applies to all the Company's personnel policies and procedures, not just those specifically connected with Equal Opportunities.

2. DEFINITION OF DISCRIMINATION

- 2.1. Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.
- 2.2. Discrimination may be direct or indirect.

3. TYPES OF DISCRIMINATION

- 3.1. Direct Discrimination
 - 3.1.1. This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation
- 3.2. Indirect Discrimination
 - 3.2.1. This is the application of a policy, criterion or practice which the Company applies to all personnel, but which is such that:
 - 3.2.1.1. It is it detrimental to a considerably larger proportion of people from the group that the person the Company is applying it to represents.

- 3.2.1.2. The Company justify the need for the application of the policy on a neutral basis; and
 - 3.2.1.3. The person to whom the company is applying it suffers detriment from the application of the policy.
 - 3.2.2. Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against personnel with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.
- 3.3. Harassment
 - 3.3.1. Harassment is physical, verbal or non-verbal behaviour which is unwanted and personally offensive to the recipient, and which causes the recipient to feel threatened, humiliated, intimidated, patronised, denigrated, bullied, distressed or harassed.
- 3.4. Victimisation
 - 3.4.1. This occurs when a person is treated less favourably because they have brought or intend to bring proceedings, or they have given or intend to give evidence.
- 4. HANDLING COMPLAINTS
 - 4.1. Discrimination harassment and victimisation are often complex matters, and there is no single way of dealing with every suspected or alleged instance.
 - 4.2. In some cases, personnel may be able to deal satisfactorily with an issue by raising it with their immediate manager.
 - 4.3. If a member of personnel wishes to make a formal complaint, he or she should use the Company's Grievance Procedure which is set out in the Staff Handbook.
 - 4.4. The Company will treat seriously all allegations of unlawful discrimination or harassment.
 - 4.5. If a member of personnel is accused of unlawful discrimination harassment or victimisation, the Company will investigate the matter fully.
 - 4.6. In the course of the investigation the member of personnel will be given the opportunity to respond to the allegation and provide an explanation of his or her actions.
 - 4.7. If the Company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter.
 - 4.8. If the Company concludes that the claim is false or malicious the complainant may be subject to disciplinary action.
 - 4.9. If on the other hand the Company concludes that the personnel's actions amount to unlawful discrimination or harassment, then the personnel may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.
- 5. POSITIVE ACTION
 - 5.1. 'Positive action' means the steps that the Company can take to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within the Company.
 - 5.2. If DB Rail Solutions Ltd chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position

6. MONITORING

- 6.1. The Company will not tolerate unlawful discrimination harassment or victimisation of any kind in the working environment and will take positive action to prevent its occurrence.
- 6.2. In this connection DB Rail Solutions Ltd will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all the Company's policies and procedures, not just those specifically concerned with Equal Opportunities.

This policy will be reviewed at least every 12 months and updated as necessary.



David Barnett
Managing Director
08 January 2025