



Diversity, Inclusion and Equal Opportunities Policy

Purpose and Aim

This policy applies to all companies (the Company) which forms part of a number of companies and subsidiaries incorporated and registered in the UK which in turn form part of The Travel Corporation (Group).

The Company is committed to creating a work environment that promotes equal opportunities in employment and is free of harassment and bullying, where everyone is treated with dignity and respect, avoiding unlawful discrimination against our employees or guests. The policy will be reviewed on an ongoing basis to reflect changes in the law, demographics and internal business requirements.

In issuing the policy our aims are:

1. to ensure that we create a work environment that is free from discrimination, where everyone can achieve their potential
2. that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities and diversity and inclusion in employment.
3. to encourage all employees to take an active role against all forms of harassment or discrimination
4. to demonstrate to all employees that they can rely on the Company's support in cases of harassment or discrimination
5. to be compliant with related legislation and best employment practice

This policy applies to all aspects of our working practices and therefore applies to the recruitment and selection of employees, terms and conditions of employment, training, salary, work allocation, promotion and disciplinary procedures.

To this purpose TTC has an Employee Representative Group called "TTC IDEA", which stands for: **I**ntity, **D**iversity, **E**quity and **A**ction.

The aim of this group is to start a conversation about how TTC can become an even more inclusive employer. It creates an opportunity for all employees to get involved in promoting a diverse and inclusive workforce. The initiative aids the fair recruitment and promotion of people from all groups covered by protected characteristics and more.

The Law

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.



It is generally unlawful to discriminate directly or indirectly, harass or victimise a member of the public based on any of the protected characteristics in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

Dignity at Work

The Company is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. Some harassment is unlawful discrimination and serious harassment may be a criminal offence.

Harassment and bullying can have very serious consequences for individuals and the Company. Harassment or bullying may make people unhappy; may cause them stress and affect their health, family and social relationships; may affect their work performance and could cause them to leave their job. Severe cases of harassment and bullying can even lead to mental illness and suicide. Effect on us can include loss of morale, poor work performance, increased turnover of staff, legal claims and damage to our reputation. Employees found guilty of harassment or bullying may face disciplinary penalties up to and including dismissal, could be personally liable to pay compensation in legal claims, and may find their own family and social relationships are adversely affected. Serious harassment may be a criminal offence.

We will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. We will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

This policy covers bullying and harassment of and by managers, employees, contractors, agency staff and anyone else engaged to work at the Company, whether by direct contract with the Company or otherwise. If the complainant or alleged harasser is not employed by the Company, e.g. if their contract is with an agency, this policy will apply with any necessary modifications such as requiring the agency to remove the worker, if appropriate after investigation.

The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, e.g. business trips and work related social events.

What is bullying and harassment?

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:



- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, e.g. sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment, but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

A single incident can be harassment if it is sufficiently serious.

Examples of Bullying and Harassment

Bullying and harassment may be misconduct which is physical, verbal or non-verbal, e.g. by letter or email. Examples of unacceptable behaviour that are covered by this policy include (but are not limited to) the following:

- picking on someone or setting them up to fail
- making threats or comments about someone's job security without good reason
- physical conduct ranging from unwelcome touching to serious assault
- unwelcome sexual advances
- demeaning comments about a person's appearance
- unwelcome jokes or comments of a sexual or racial nature or about an individual's age
- excluding an individual because they are associated or connected with someone with a protected characteristic
- repeated name calling related to an individual's religion or belief
- ignoring an individual because they are perceived to have a protected characteristic (whether or not they do, in fact, have that protected characteristic)
- the use of obscene gestures
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person or relating to their actual or perceived protected characteristic, eg magazines, calendars or pin-ups

Bullying does not include appropriately conducted criticism of an employee's behaviour or job performance by management.

An employee can be bullied or harassed by a colleague or a subordinate as well as by a manager or supervisor. An employee can be bullied or harassed at work and, through their connection with work, outside working hours and / or outside the workplace. We will not tolerate bullying or harassment whatever the perpetrator's status and wherever it occurs. It is important to recognise that what one employee may find acceptable, another



may find totally unacceptable and that the essence of harassment and bullying is that the words or behaviour are unwelcome to the particular person who is the target of the words or behaviour. All employees must treat their colleagues with respect and appropriate sensitivity.

What is Victimisation?

Victimisation is treating someone less favourably than others because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them worse work to do.

Provided that an employee acts in good faith, e.g. they genuinely believe that what they are saying is true, the employee has a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the Company will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised the employee.

Making a complaint which the employee knows to be untrue or giving evidence which they know to be untrue, may lead to disciplinary action being taken against them.

Informal Resolution

If an employee feels they are being bullied or harassed, they may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. The employee may feel able to approach the person themselves, or with the help of someone else at the Company. The employee should tell the person what behaviour they find offensive and unwelcome and say that they would like it to stop immediately.

Employees are encouraged to seek the assistance of the People & Culture department when they want advice regarding appropriate steps to stop the harassment. Any such discussion will be strictly confidential.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint.

Formal Complaints Procedure

In the event that informal resolution of the matter is unsuccessful, or considered inappropriate by the employee in the circumstances, the employee may make a formal complaint by using the Company's grievance procedure. In addition, the Company may decide that it is necessary to take more formal action.

In the case of grievances about bullying or harassment, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your manager or with another manager.

All complaints will be investigated promptly and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or trade union official of your choice at any meeting dealing with your grievance. You will be kept informed of the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

The Company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.



You have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Company, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Conduct of this type will often be gross misconduct which can lead to dismissal without notice.

Anti-discrimination

The company will conduct a full training needs analysis relating to the understanding and management of diversity, integrate diversity into mainstream training and development programmes. We will undertake an audit of existing communications channels so that compliance and inclusiveness are assured; ensure that communication imagery and graphics are inclusive, and reflect and reinforce the words within this document. The company will communicate and celebrate the organisation's successes in diversity.

We will strive to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

We will consider any possible indirectly discriminatory effect of our working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done. We will refuse requests for variations to working practices only if we have good reasons for doing so, that are unrelated to any protected characteristic. We will comply with our obligations in relation to statutory requests for contract variations and will also make reasonable adjustments to our working practices for individuals with a disability.

We will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process. As part of the commitment to creating and cultivating a workplace that embraces equality, diversity and inclusion, it is important that the whole workforce takes steps to address any negative biases that limit opportunities or creativity, and that can lead to discrimination.



Unconscious bias

As part of our commitment to creating and cultivating a workplace that embraces equality, diversity and inclusion, it is important that we take steps to address any negative biases that limit opportunities or creativity, and that can lead to discrimination.

Unconscious biases will have an impact on any interactions in the workplace. All people management processes may be affected by unconscious biases, including:

- recruitment;
- day-to-day management, such as work or leave allocation;
- performance reviews;
- promotion and;
- redundancy.

While unconscious biases exist, they do not operate as an excuse to take decisions that the employee can simply attempt to justify as being out of their control. Recognising biases, or allowing others to call them out, means that they are no longer unconscious.

By acknowledging the possibility of bias in a particular situation, employees are more likely to ask themselves whether they are being fair and inclusive.

All conversations held at work, whether they are between the manager and their team, with stakeholders or with clients, must be conducted within a framework of fairness, respect and dignity. Employees should ensure that they are open to the perspectives of others; contrasting viewpoints can minimise automatic biases. Organisations that foster and further conversations about biases to cultivate a culture of proactive measures and reassurances will enable employees to call out biases when they occur.

Reporting

Employees are encouraged to seek the assistance of the People and Culture department when they want advice regarding this policy.