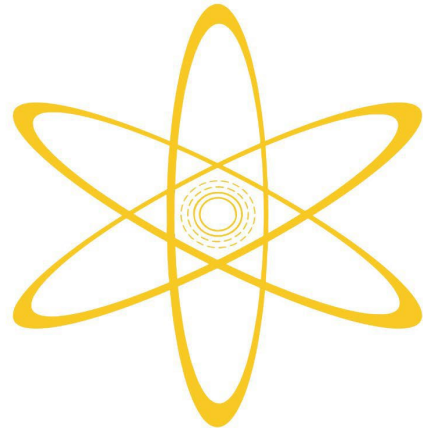


**ENIGMA
GROUP**

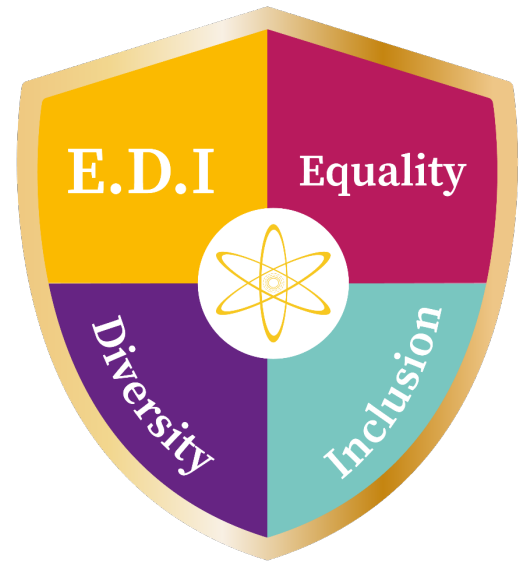


EQUALITY, DIVERSITY, AND INCLUSION POLICY

POLICY STATEMENT

This is the policy of Enigma Security Solutions Limited (“Enigma”). Enigma believes Equality is about equal opportunities and protecting people from being discriminated against while diversity is about recognising respecting and valuing differences in people. Meanwhile, inclusion refers to an individual’s experience within the workplace and in a wider society, and the extent to which they feel valued and included.

Diversity refers to the differences in us. To be more specific, it refers to recognising and respecting the differences in us. It is only when we recognise the differences that we can respect and celebrate them as well as benefit from them. These differences include aforementioned factors such as race, age, gender, marital status, and disability, as well as diverse perspectives, work experience, and lifestyles Diversity is strongly related to promoting human rights and freedom, based on principles such as dignity and respect. Enigma understands none of us to fit neatly into separate ‘packages’ which can be neatly labelled or discriminated against. Everyone is different, so there is no need to stereotype them and discriminate against them.



ENIGMA UNDERSTANDING OF INCLUSION.

Inclusion refers to an individual’s experience within his or her workplace and in wider society, and the extent to which he or she feels valued and included. In other words, inclusion is about giving equal access, opportunities, and resources to everyone irrespective of gender, race, age, or any other factor. In fact, most people see inclusion as a universal human right.

ENIGMA UNDERSTANDING OF RELATIONSHIP BETWEEN EQUALITY DIVERSITY AND INCLUSION.

Together, all these three concepts help to create a fair society everyone gets equal opportunities. We can create equality of opportunity only when we recognise and value difference and work together for inclusion.

ENIGMA UNDERSTANDING OF THE DIFFERENCE BETWEEN EQUALITY DIVERSITY AND INCLUSION.

Equality is about equal opportunities and protecting people from being discriminated against. Diversity is all about recognising respecting and valuing differences in people. Inclusion, on the other hand, refers to an individual’s experience within his or her

workplace and in wider society, and the extent to which he or she feels valued and included.

Therefore, Enigma recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of Enigma to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment following the Equality Act 2010 protected characteristics on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation.

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

All employees, whether part-time, full-time, or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.

This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, European and UK Governments, and any other recognised statutory bodies.

OUR COMMITMENT

- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- Training, development, and progression opportunities are available to all staff.
- To promote equality in the workplace which we believe is good management practice and makes sound business sense.
- We will review all our employment practices and procedures to ensure fairness.
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- This policy is fully supported by senior management and has been agreed with trade unions and/or employee representatives.
- The policy will be monitored and reviewed annually

RESPONSIBILITIES OF MANAGEMENT

Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that:

- All their staff are aware of the policy and the arrangements, and the reasons for the policy.
- Grievances concerning discrimination are dealt with properly, fairly, and as quickly as possible.
- All Staff recruitment below senior management level is evenly grounded via Enigma's standard Testing and Security Vetting Procedures.
- Equality Training and Monitoring Records are maintained.

Human Resources / Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

RESPONSIBILITIES OF STAFF

Responsibility for ensuring that there are no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- Comply with the policy and arrangements.
- Not discriminate in their day-to-day activities or induce others to do so.
- Not victimise, harass, or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- Inform their manager if they become aware of any discriminatory practice.

THIRD PARTIES / HARRASMENT /BULLYING

Third-party harassment occurs where a Company employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. Enigma will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once that this has occurred. Enigma will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

Enigma aims to support the creation of a work environment that is free from discrimination, harassment, and bullying, where everyone is treated with dignity and respect and no one is treated less favourably than any other person or group of persons on the grounds of their gender, age, disability, race, sexual orientation, gender

reassignment status, religion and belief, pregnancy and maternity, marriage and civil partnership status or any other characteristic.

This policy acts as guide for all employees, contractors, agency staff and anyone else engaged to work with Enigma.

The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example business trips or any work-related social events. It also covers contact between colleagues outside of working hours such as through social media or messaging apps.

The purpose of this policy is to encourage a working environment in which bullying, and harassment are always unacceptable and where individuals have the confidence to complain about bullying and harassment should it arise, in the knowledge that their concerns will be dealt with appropriately and fairly. Complaints will not be ignored but investigated swiftly and confidentially ensuring the rights of all are protected. This responsibility applies to all managers of Enigma.

Any incident(s) of bullying and harassment should initially be reported to your line manager who will provide you advice. If the concern relates to your line manager, then you can speak to any other manager and/or seek support from any of the support services available to staff.

In complying with the Equality Act 2010, Enigma has a legal obligation to ensure that harassment does not take place at work, as this is discrimination. In addition, it has a duty of care towards employees under the Health and Safety at Work Act 1974. Managers must aim to uphold a working environment in which harassment and bullying cannot flourish. They must take immediate action if bullying and/or harassment is suspected or identified, whether or not a complaint has been made. Allegations of bullying and harassment received either formally or informally through this policy will be taken seriously and dealt with promptly and sensitively. Equally, every employee is also personally liable under the legislation. All incidents, complaints will go through Enigma Human Resources Department.

RELATED POLICIES AND ARRANGEMENTS

All employment policies and arrangements have a bearing on equality of opportunity. The Company policies will be reviewed regularly, and any discriminatory elements removed.

RIGHTS OF DISABLED PEOPLE

The Company attaches particular importance to the needs of disabled people. Under the terms of this policy, managers are required to:

Make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours.

(NB: managers are expected to seek advice on the availability of advice and guidance from external agencies to maintain disabled people in employment).

- Include disabled people in training/development programmes.
- Give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

EQUALITY TRAINING

A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programmes, Site Instruction Manuals, and the yearly staff appraisals.

Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.

MONITORING

- The Company deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.
- The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion /beliefs, grade, and length of service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained.
- There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.
- We will maintain information on staff who have been involved in certain key policies: Disciplinary, Grievance and Bullying & Harassment.
- Where appropriate equality impact assessments will be carried out on the results of monitoring to ascertain the effect of the Company policies and our services/products may have on those who experience them.
- The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.
- If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action.

GRIEVANCES/DISCIPLINE

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance or Harassment Procedures.

Discrimination and victimisation will be treated as disciplinary offences, and they will be dealt with under the Company Disciplinary Procedure.

REVIEW

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Managing Director.

Signed:



Name: Mahendra Vekariya

Date: 19/01/2023

Position: Director

Review period of this policy - annual.