



Equal Opportunity, Diversity and Inclusion Policy

LOKR Sports Ltd

Last updated: 28 April 2026

Document Control

Policy Owners: CEO

Approval Date: 01/08/2024 \ **Effective Date:** 01/08/2024 \ **Review Date:** October 2026

Note: This policy must be reviewed annually or when significant changes occur to ensure its continued relevance and effectiveness.

- **01/08/2024** (v1.0, Claire Robinson) Create formalised Equal Opportunity, Diversity and Inclusion Policy based on existing Ethics Guidance
- **10/08/2025** (v1.1, Claire Robinson) Annual Review
- **08/10/2025** (v1.2, Claire Robinson) Updates for LOKR.

1. Introduction

This policy outlines LOKR Sports Ltd (LOKR)'s commitment to fostering a working environment that ensures equality of opportunity and freedom from unlawful discrimination based on race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. This Policy is designed to eliminate unfair and discriminatory practices within the Company and to promote full participation from its diverse community. LOKR is committed to actively opposing all forms of discrimination.

The Company also strives to provide services that do not discriminate against clients and customers in respect of the way that they access the services and goods provided by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

Any personal data used in connection with this Policy will be collected, held, and processed in accordance with LOKR's Data Protection Policy.

2. Scope

This Policy applies to all employees, subcontractors, and agents working with LOKR, including those employed on a permanent, temporary, part-time, or casual basis. It also applies to all applicants for employment, volunteers, and interns. Additionally, this Policy is relevant to all interactions with clients, customers, suppliers, and any other third parties associated with the Company.

The scope of this Policy covers all areas of the Company's operations, including but not limited to:

- Recruitment and selection processes
- Training, development, and career progression
- Terms and conditions of employment
- Performance management and appraisals
- Promotion and transfer opportunities
- Compensation, benefits, and reward structures
- Termination of employment, including redundancy procedures
- Conduct in the workplace, including interactions between employees

and third parties

- Provision of goods and services to clients and customers

This Policy ensures that all practices and procedures are free from unlawful discrimination and that every individual is treated with respect and dignity. The Policy aims to create an inclusive environment where diversity is valued, and all employees can contribute fully to the success of the Company.

The Company commits to monitoring the effectiveness of this Policy and making necessary adjustments to ensure compliance with the Equality Act 2010 and any other relevant legislation. The Policy does not form part of any employee's contract of employment and may be amended at any time at the Company's discretion.

3. Objectives of this Policy

- To prevent, reduce, and eliminate all forms of unlawful discrimination in line with the Equality Act 2010.
- To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy, and dismissals are based on capability, qualifications, experience, skills, and productivity.

4. Definition of Discrimination

Discrimination involves unequal or differential treatment leading to one person being treated either more or less favourably than others in similar circumstances based on race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. Discrimination may be direct or indirect and includes discrimination by perception and association.

5. Types of Discrimination

Direct Discrimination: This occurs when a person or policy intentionally treats someone less favourably on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation.

Indirect Discrimination: This is the application of a policy, criterion, or practice which the employer applies to all employees but which:

- Is detrimental to a significantly larger proportion of people from the group that the individual represents.
- Cannot be justified by the employer on a neutral basis; and
- Causes detriment to the person to whom it is applied.

Example: Requiring all employees to pass a physical fitness test that includes running a certain distance within a set time frame could indirectly discriminate against older employees or those with certain disabilities.

Harassment: Unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

Victimisation: Treating someone less favourably because they have brought or intend to bring proceedings, or because they have given or intend to give evidence.

Sex: It is illegal to treat someone unfairly based on their sex, marital status, civil partnership, pregnancy, maternity, gender reassignment, or transgender status. This protection covers all genders and those undergoing gender reassignment. Sexual harassment is a form of sex discrimination.

Example: Asking a woman in an interview if she plans to have children is considered discrimination based on gender.

Age: Discriminating against a person because of their age is prohibited. This protection extends to individuals of all ages, though it does not currently affect redundancy payment calculations.

Disability: It is illegal to treat a disabled individual less favourably than a non-disabled person. Employers must make reasonable adjustments to ensure disabled individuals have equal access to services and employment opportunities.

Race: Discrimination based on race, skin colour, nationality, or ethnic origin is unlawful.

Sexual Orientation: It is unlawful to treat someone unfairly because of their sexual orientation.

Example: An employer cannot refuse to hire someone because they are homosexual, heterosexual, or bisexual.

Religion or Belief: Discriminating against someone based on their religious beliefs, religion, or lack thereof is prohibited.

6. Positive Action in Recruitment

Under the Equality Act 2010, positive action in recruitment and promotion has been applicable since 6 April 2011. Positive action involves steps that the Company can take to encourage people from groups with different needs or a history of disadvantage or low participation to apply for positions. If LOKR uses positive action in recruitment, it will only be applied in tie-break situations where two candidates of equal merit are applying for the same position.

7. Reasonable Adjustments

LOKR has a duty to make reasonable adjustments to facilitate the employment of a disabled person, which may include:

- Adjusting premises
- Reallocating duties
- Transferring to a more suitable role
- Relocating to a more suitable office
- Allowing time off for medical treatment or rehabilitation
- Providing training or mentoring
- Supplying or modifying equipment and training materials
- Any other reasonable and necessary adjustments within the Company's

financial means

If an employee has a disability and believes adjustments could be made, they should contact the Operations Team.

8. Responsibility for the Implementation of this Policy

All employees, subcontractors, and agents of the Company must act in a manner that does not subject any other employees or clients to direct or indirect discrimination, harassment, or victimisation. Cooperation from all employees is essential. All employees must adhere to this Policy and ensure others do the same. Employees may be held individually liable for discriminatory acts by the Company, and an Employment Tribunal may order compensation for discriminatory acts.

The Company is responsible for achieving the objectives of this Policy and ensuring compliance with relevant legislation and codes of practice.

9. Acting on Discriminatory Behaviour

If an employee is subject to, perpetrates, or witnesses discriminatory behaviour, they should refer to the LOKR disciplinary and grievance procedures. In the first instance, it is advised that employees should speak to the Operations Manager.

10. Advice and Support on Discrimination

Employees may contact their employee or trade union representative if available. Other contacts include:

- **Equality and Human Rights Commission**
- Manchester: Arndale House, The Arndale Centre, Manchester, M4

3AQ

- London: Fleetbank House, 2-6 Salisbury Square, London, EC4Y 8JX
- Cardiff: Block 1, Spur D, Government Buildings, St Agnes Road,

Gabalfa, Cardiff, CF14 4YJ

- Glasgow: 151 West George Street, Glasgow, G2 2JJ
- Helpline: Phone: 0808 800 0082, Textphone: 0808 800 0084
- Website:

www.equalityhumanrights.com

- **Citizens Advice Bureau**
- 3rd Floor North, 200 Aldersgate Street, London, EC1A 4HD
- Website:

www.citizensadvice.org.uk

- **Community Legal Services Direct**
- Telephone: 0845 345 4 345
- Website: www.clsdirect.uk

11. Responsibility

- **Board of Directors:** The board of directors has overall

responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

- **Chief Executive Officer (CEO):** The CEO has primary and

day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

- **Management:** Management at all levels are responsible for

ensuring those reporting to them is made aware of and understand this policy and are given adequate training on it.

12. Enforcement:

All employees, contractors, and suppliers are expected to comply with this policy. Non-compliance may result in disciplinary action or termination of contracts, depending on the nature and severity of the breach. Persistent or deliberate breaches may be escalated to the Board for further action. LOKR reserves the right to audit compliance and require corrective measures where deficiencies are identified.

13. Review

All policies are reviewed on an annual basis automatically. Additional specific criteria for review include:

- Changes to local or national policy or service provision or

legislation

- Incidents prompting policy review (e.g., where policy was not

followed, or proved inadequate)