Halo Benefits

POLICY

Equality, Diversity and Inclusion Policy

Our commitment to fairness, dignity and respect for everyone.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All directors, employees, workers, contractors, job applicants and former staff of Halo Benefits Ltd
Related policies	Code of Conduct and Business Ethics, Health and Safety Policy, Whistleblowing Policy

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the policy

Halo Benefits Ltd is committed to equality of opportunity and to a working environment where everyone is treated with dignity and respect. Our platform helps employers support their people, so fairness and inclusion are central to what we do as well as how we work.

This policy sets out how we meet our obligations under the Equality Act 2010 and how we aim to go beyond them.

2. Scope

This policy applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees, workers, contractors, job applicants and former staff. It covers every part of employment, including recruitment, pay, training, promotion, discipline and leaving, and how we treat customers, suppliers and visitors.

3. Protected characteristics

We will not discriminate, directly or indirectly, against anyone because of any of the protected characteristics in the 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, and sexual orientation.

We also aim to treat people fairly regardless of their socio-economic background, caring responsibilities or working pattern.

4. Unacceptable behaviour

The following are not tolerated and are treated as disciplinary matters:

- direct and indirect discrimination;
- harassment, including sexual harassment;
- victimisation of anyone who has made or supported a complaint; and
- bullying.

We take reasonable steps to prevent sexual harassment of our people, including by third parties such as customers, in line with the duty introduced by the Worker Protection (Amendment of Equality Act 2010) Act 2023.

5. Fair recruitment

- Job adverts and descriptions use inclusive language and include only genuine requirements.
- Selection is based on objective, job-related criteria, using structured interviews with consistent questions.
- Where possible, more than one person is involved in shortlisting and interview decisions.
- Applicants are asked whether they need any adjustments to the recruitment process.
- We do not ask about health or disability before a job offer, except where allowed by section 60 of the Equality Act 2010.

6. Fair pay

- Everyone is paid at least the Real Living Wage, as set by the Living Wage Foundation.
- Pay is set according to role, skills and experience, using consistent criteria.
- The Board reviews pay decisions to check for any unexplained differences between groups, including between men and women doing equal work.
- We are below the 250-employee threshold for statutory gender pay gap reporting, but review our pay data internally every year.

7. Adjustments, flexibility and family

- We make reasonable adjustments for disabled job applicants and staff, including to equipment, hours, duties, location and processes. Requests are handled promptly and confidentially, and remote working gives us flexibility to make many adjustments easily.
- We support flexible working requests from the first day of employment.
- We offer family-friendly leave at least in line with statutory entitlements and, as a company that helps employers support their people, we aim to lead by example.

8. Training and development

Opportunities for training, development and promotion are open to everyone, based on merit and business need. All staff complete equality, diversity and inclusion training, including harassment prevention, when they join and every year. Managers receive additional guidance on fair recruitment and handling complaints.

9. Monitoring and accountability

We invite applicants and staff to share diversity information on a voluntary basis, and every question includes a "prefer not to say" option. This information is kept separate from recruitment decisions, protected as special category data under UK GDPR, and only reported in total where individuals cannot be identified. As a small company, we use this data carefully, knowing it may not be statistically meaningful for some time.

- **Board of Directors:** receives an annual report covering our workforce profile and recruitment (where numbers allow), equal pay, complaints, training completion and reasonable adjustment requests, and agrees any actions.
- **Designated director:** a director nominated by the Board coordinates monitoring, training and the annual report.
- **Managers:** apply this policy in recruitment and people management, and deal promptly with complaints.
- **Everyone:** treats others with respect, completes training and challenges or reports unacceptable behaviour.

10. Raising concerns and breaches

Anyone who experiences or witnesses discrimination, harassment, bullying or victimisation should raise it with their manager, any director or at **compliance@halobenefits.co.uk**. Complaints can be raised informally or through our formal grievance procedure, or under our Whistleblowing Policy. All complaints are taken seriously, investigated promptly and handled as confidentially as possible.

Breaches of this policy are dealt with under our disciplinary procedure, and serious cases may amount to gross misconduct. No one will be victimised for making a complaint in good faith.

11. Review

This policy is reviewed annually, and sooner after any significant change in the law, and alongside our annual equality report. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> QUESTIONS ABOUT THIS POLICY?
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.