Equality & Diversity Policy

Matrix iQ
CONNECTING TECHNOLOGY WITH INTELLIGENCE

What we stand for

At Matrix iQ, every person deserves to feel respected, valued and empowered to do their best work. Inclusion is woven into how we design products, lead teams, and serve customers and communities. As a certified B Corp, we champion fairness, sustainability and positive impact. We innovate with purpose, act with professionalism, and work together to make a difference.

Purpose

This policy sets out how we promote equality, diversity and inclusion (EDI) at Matrix iQ in line with UK law, including the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023, and other relevant legislation. This policy applies to all employees (permanent, fixed-term, part-time), workers, agency staff, contractors, consultants, interns, volunteers and job applicants.

We will:

- Ensure fairness and respect in all aspects of employment.
- Comply with the Equality Act 2010 and protect against discrimination, harassment and victimisation in relation to the protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- Oppose all forms of unlawful discrimination – direct, indirect, harassment and victimisation – and meet our proactive duty to take reasonable steps to prevent sexual harassment.

Scope & responsibilities

Creating an inclusive workplace is a shared responsibility:

- Directors hold overall accountability for policy, resourcing and compliance.
- Managers must lead by example in recruitment, development, performance and day-to-day practices; they must also implement the preventative duty on sexual harassment (see section 8).
- Everyone must treat others with dignity and respect and uphold this policy in interactions with colleagues, candidates, customers, suppliers and visitors.

Our commitments

We will:

- Foster a culture of dignity, respect and belonging, with zero tolerance for bullying, harassment and discrimination.
- Investigate concerns promptly and fairly; take appropriate action.
- Make decisions on merit, free from bias; review our processes for fairness and compliance.
- Monitor workforce representation and inclusion insights to improve outcomes (respecting privacy and data protection law when handling sensitive data).
- Support wellbeing with access to Plumm HR tools and a trained Mental Health First Aider.
- Champion inclusion through iMPACT, our employee-led forum (see section 7).

We see diversity as a strength: different backgrounds, experiences and perspectives drive innovation and growth.

Legal framework

- Equality Act 2010: prohibits discrimination, harassment and victimisation based on protected characteristics; requires reasonable adjustments for disabled applicants and employees.
- Worker Protection (Amendment of Equality Act 2010) Act 2023: from 26 Oct 2024 employers must take reasonable steps to prevent sexual harassment. Breach can lead to an uplift of up to 25% in tribunal compensation and EHRC enforcement.
- Protection from Harassment Act 1997: certain harassment may also be a criminal offence (civil and criminal remedies).
- Flexible Working (from 6 Apr 2024): day-one right to request; up to two requests in 12 months; consultation required; employer decision within 2 months.
- Carer's Leave (from 6 Apr 2024): day-one right to one week unpaid carer's leave per 12 months to provide/arrange long-term care for a dependant; employers can defer (not refuse) only if serious disruption would result.
- Meaning of "sex" under the Equality Act: the UK Supreme Court (16 Apr 2025) held that "sex", "man" and "woman" in the Equality Act mean biological sex. Protection for gender reassignment remains distinct and intact. EHRC is updating statutory Codes; interim materials have been issued and revised. We will comply with updated Codes once in force.

Note: The EHRC's technical guidance on sexual harassment was updated in Sept 2024 and will be considered by tribunals; a Services Code (single-sex services) is in the pipeline. We will track and adopt the final Codes.

Recruitment & employment practices

We are committed to fair, inclusive practices. We will:

- Advertise roles widely and inclusively; avoid unnecessary criteria that may exclude diverse talent.
- Base selection on skills, experience and potential; apply objective, job-related criteria.
- Make **reasonable adjustments** for disabled applicants and employees (e.g., accessible formats, adjusted interview process, equipment, flexible hours).
- Review pay, benefits and working conditions to prevent discrimination; apply disciplinary, grievance and redundancy procedures consistently.

Flexible working

We implement the 2024 regime (day-one right; two requests per year; consultation; two-month decision). Managers must follow the Acas Code and record decisions with the statutory business reason(s) where a request is declined.

Carer's leave: eligible employees have a day-one right to up to one week unpaid carer's leave per 12 months; notice rules apply; requests may be postponed but not refused if serious disruption would result.

Dignity at work: bullying, harassment & victimisation

Harassment is unwanted conduct related to a protected characteristic, or of a sexual nature, that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. A single incident may be enough. The law imposes a positive duty to take reasonable steps to prevent sexual harassment.

Bullying includes offensive, intimidating, malicious or insulting behaviour, abuse or misuse of power undermining, humiliating or injuring someone.

Harassment may also be a criminal offence under the Protection from Harassment Act 1997.

Gender identity, expression & gender reassignment

We do not tolerate discrimination, harassment or victimisation because of gender identity, gender expression or gender reassignment. Gender reassignment is a protected characteristic: protection applies to anyone proposing to undergo, undergoing or having undergone a process (which need not be medical) to reassign their sex.

Names & pronouns: We will use an individual's stated name and pronouns in day-to-day interactions and systems wherever lawful and technically feasible. Intentional or repeated misuse may be treated as misconduct.

We will agree a confidential Transition Support Plan (if desired) covering (for example) name/pronoun updates, IT and directory changes, dress code, facilities access, communication preferences and phased changes to records, recognising that legal, HR and payroll systems have different requirements.

We will ensure safe, dignified access to facilities for everyone. In line with current law, certain workplace and service-provision decisions may (where justified) be based on biological sex, and separate or single-sex spaces may be provided in limited circumstances. At the same time, no one should be left without appropriate, private facilities (e.g., single-occupancy, lockable unisex rooms). We will make proportionate, case-by-case decisions with privacy, dignity and safety in mind, and in line with EHRC guidance as it is finalised.

Information about a person's trans status, health, sexual life or sexual orientation is sensitive personal data (special category). We will only collect and process it where necessary, use a lawful basis under Article 6 plus a separate Article 9 condition, apply data minimisation, access controls and retention limits, and consider DPIAs for higher-risk processing. We will not disclose a person's trans status without a lawful basis and a clear business need.

We acknowledge that the law and the EHRC Codes on single-sex services are evolving; we will revisit this section when the updated Services Code is laid before Parliament.

Championing inclusion through iMPACT

Our **iMPACT** forum is an employee-led group that drives initiatives to:

- Positively impact stakeholders and the environment.
- Champion B Corp values and sustainability.
- Help us become truly representative of the communities we serve.
- Ensure every employee feels respected, heard, and able to thrive.
- Improve employee satisfaction, celebrate success, and make Matrix iQ an even better place to work.

Preventing sexual harassment – our proactive duty

We must take reasonable steps to prevent sexual harassment of workers, including anticipating where risks may arise and acting to reduce them. Tribunals can uplift compensation by up to 25% if we breach this duty; the EHRC can investigate and take enforcement action.

Minimum standards we will maintain:

1. Maintain and communicate a robust anti-harassment policy (this document), clearly distinguishing sexual harassment from other harassment related to protected characteristics.
2. Conduct regular, documented risk assessments considering work environment, power imbalances, lone/home working, social events, third-party interactions and workforce demographics; update mitigations accordingly.
3. Provide periodic, role-specific training to all staff and managers on recognising, preventing and responding to sexual harassment; refresh regularly.
4. Maintain multiple reporting channels (line manager, any SLT member, or Head of People & Culture) and, where appropriate, anonymous options. Track and review them for effectiveness.
5. Follow fair, trauma-informed procedures; act swiftly; protect confidentiality as far as possible; take appropriate action and implement "lessons learned."
6. Take reasonable steps to reduce risks from customers/clients/suppliers (e.g., codes of conduct, pre-briefs, escalation paths).
7. Use surveys, exit interviews and metrics to evaluate measures; iterate improvements.

Wellbeing & support

We care deeply about the wellbeing of our people. We provide:

- Plumm HR tools, resources and support for mental, emotional and professional health.
- A trained Mental Health First Aider for confidential support and guidance.

  Wellbeing is central to inclusion: when people feel safe and supported, they can thrive.

Reporting concerns (informal or formal)

If you experience or witness discrimination, harassment or bullying:

- Raise it informally or formally using our grievance procedure.
- Speak with your line manager, any member of the Senior Leadership Team, or the Head of People & Culture (whomever you feel most comfortable approaching).
- You will not be penalised for raising a genuine concern, even if it is not upheld. Retaliation is prohibited.

We recognise that power dynamics may make direct confrontation difficult. We will take every complaint seriously and act swiftly to protect your wellbeing. If a complaint is upheld, we'll minimise contact with the person involved unless you request otherwise; if not upheld, we'll support both parties to rebuild a respectful working relationship.

Any employee who breaches this policy may face disciplinary action (up to and including dismissal). Managers who fail to act on known issues will be held accountable.

Data & privacy (how we use EDI information)

Where we collect EDI data (e.g., for monitoring), we will explain why we're collecting it, whether it is special category data, the lawful basis/Article 9 condition relied upon, how we secure it, who can access it, and how long we keep it. We will avoid unnecessary collection and follow the ICO's guidance on special category data, and we will be transparent about sex and gender identity questions in line with official data guidance.

Monitoring & review

We will review this policy at least annually and whenever material legal or regulatory updates occur, including:

- any new EHRC statutory Codes (e.g., Services Code on single-sex services and the updated harassment/sexual harassment guidance already in effect);
- changes introduced via the government's Employment Rights Bill (e.g., provisions on predictable work and one-sided flexibility replacing or supplanting the shelved Workers (Predictable Terms and Conditions) Act).

Appendix A – Definitions

- Direct discrimination: treating someone worse because of a protected characteristic.
- Indirect discrimination: a policy or practice which applies to everyone but puts people with a protected characteristic at a particular disadvantage and is not a proportionate means of achieving a legitimate aim.
- Harassment: unwanted conduct related to a protected characteristic, or of a sexual nature, that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment; a single incident can be enough.
- Victimisation: subjecting someone to a detriment because they made or supported a complaint of discrimination.
- Gender reassignment: proposing to undergo, undergoing or having undergone a process to reassign sex; medical supervision is not required.
- Reasonable adjustments: steps to remove or reduce disadvantages faced by disabled people that it is reasonable for an employer to take (duty applies to applicants, employees and certain workers).