



EQUAL OPPORTUNITIES POLICY

The Company is fully committed to providing a harmonious working environment in which employees are able to maximise their full potential and to contribute to business success, irrespective of their gender, sexual orientation, age, race, religion or belief, disability or marital status.

The Company is committed to identifying and eliminating discriminatory practices, procedures and attitudes throughout the organisation. The Company believes that all employees are entitled to be treated with dignity and respect while at work and also when representing the business in any capacity outside of work. The Company expects employees to support this commitment and to assist in all possible ways.

The aim of this policy is to prevent discrimination, victimisation and harassment and to provide guidance to resolve any problem should it occur and prevent recurrence. Discrimination, victimisation and harassment are disciplinary offences.

Preventing Discrimination, Victimisation and Harassment in Employment

The Company endeavours to ensure that no employee or job applicant is discriminated against, either directly or indirectly, on the grounds of gender, sexual orientation, age, race, religion or belief, disability or marital status. This commitment applies to all the aspects of employment outlined below:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career development opportunities.
- Terms and conditions of employment, and access to employment-related benefits and facilities.
- Grievance handling and the application of disciplinary procedures.

- Selection for redundancy.

Equal Opportunities Awareness

All employees will be informed of the Company's expected standards of conduct in respect of equality of opportunity at the induction stage of employment. This will outline the need for equality in the workplace, the impact that discrimination may have on fellow employees and what the consequences of derogatory conduct or remarks may include.

Where necessary, the Company will take additional steps to ensure there is an appropriate awareness amongst employees of the effects of any discriminatory behaviour.

Discrimination, Victimisation and Harassment

Discrimination, victimisation and harassment is unwanted conduct by an employee (or a group of employees) that violates another employee's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that employee.

Discrimination, victimisation and harassment may include comments relating to an employee's gender, sexual orientation, age, race, religion or belief, disability or marital status.

An employee can suffer from harassment even if the words complained of are untrue, and regardless of whether they relate to the employee him or herself.

Discrimination, victimisation and harassment may include:

- Unwanted physical contact, ranging from touching to serious assault.
- Unwelcome sexual advances, propositions, suggestions or pressure to participate in social activities outside work where it has been made clear that this is not welcome.
- Suggestions that sexual favours may further an employee's career, or that refusal may hinder it.
- Conduct which is intimidating, such as physical, verbal and non-verbal abuse. This includes the display of sexually explicit or racially offensive material, the use of sexually explicit or racially offensive humour, and comments of a

discriminatory nature, whether directed specifically at any particular individual or not.

- Derogatory comments about gay lifestyles or about other religions or beliefs.

It is the impact of this behaviour which is relevant, not the motive or intended aim.

Employees' Responsibilities

All employees have the right to work in an environment that is free from any form of discrimination, victimisation and harassment. All employees have a responsibility to help ensure a working environment in which the dignity of employees is respected; employees must ensure their behaviour to colleagues, clients and customers does not cause offence and could not in any way be considered to be a form of discrimination, victimisation and harassment. The Company fully recognises employees' right to complain about discrimination, victimisation and harassment should it occur and recommends the following procedure:

Informal Complaint

Where an employee does not view the discrimination, victimisation and harassment as serious or where it is not repeated and the employee simply wants the behaviour to stop, he/she should approach the alleged harasser directly, making it clear to the person(s) harassing them that the behaviour is offensive, is not welcome and that it should be stopped.

Where the employee finds this difficult or embarrassing, he/she may request a member of the management team to approach the alleged harasser informally on his/her behalf.

Formal Complaint

The formal complaints procedure is appropriate if the employee views any harassment to which he/she has been subjected as serious; if he/she prefers this method or if the discrimination, victimisation and harassment continues after the informal procedure has been used. All formal complaints will be dealt with seriously, promptly and confidentially under the Company's Grievance Procedure.

Formal complaints should be made in accordance with the Company's Grievance Procedure. An investigation will be conducted to clarify and formally record the nature of the complaint and the events surrounding the complaint, and will

include meetings with anyone who can assist with the investigation. During this time, every effort will be made to distance the associated parties from each other.

If an employee is accused of discrimination, victimisation and harassment

If an employee is accused of acting in an unacceptable manner towards a fellow employee or a job applicant, or if he/she is accused of discrimination, victimisation and harassment, the employee will be given a proper opportunity to rebut the allegation as part of the investigation, and provide an explanation of his/her actions.

If it is concluded that there was no discrimination, victimisation and harassment, this will be the end of the matter. If it is concluded that a false claim has been maliciously made against the employee, the person or persons responsible may be subject to disciplinary action.

If it is concluded that they have acted in a discriminatory manner, or have harassed or victimised another employee, their manager will consider what action to take. This may range from counselling to formal disciplinary action, including dismissal in serious cases.

Management Responsibilities

Managers are the guardians of equality of opportunity within their areas of responsibility. Equal Opportunities are part of the larger management responsibility of ensuring that the employment environment provides employees with motivation to do a good job. This will be impossible to achieve if individuals feel that they are being treated unfairly.

Where problems or complaints arise, managers must take these seriously and make sure they are fully investigated and that any necessary follow-up action is taken. This may include initiating disciplinary action against employees who have committed acts of discrimination, victimisation and harassment.

Monitoring

Finally, we believe that equality of opportunity is about good and effective employment practice, and about creating an environment in which everybody can be assured that his or her contribution is valued. The Company will not tolerate discrimination, victimisation and harassment of any kind in the working environment and will take positive action to prevent its occurrence.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. The Company will regularly monitor the effectiveness of its

policies and will implement changes where these could improve equality of opportunity. This commitment applies to all the Company's employment policies and procedures, not just those specifically connected with equal opportunities.

Discrimination, victimisation and harassment can take many forms but can be described as treating an individual or minority group less favourably or differently. The legislation covering discrimination include:

Employment Rights Act 1996, the Equal Pay Act 1970, the Sex Discrimination Act 1975, the Race Relations Act 1976, the Transfer of Undertakings (Protection of Employment) Regulations 1981, the Trade Union and Labour Relations (Consolidation) Act 1992, the Disability Discrimination Act 1995, the National Minimum Act 1998, the Employment Relations Act 1999, the Working Times Regulations 1998, the Working Time Regulations 1999, the Human Rights Act 1998, the Maternity and Parental Leave Regulations 1999, the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, The Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002, the Employment Equality (Sexual Orientation) Regulations, the Employment Equality (Religion or Belief) Regulations 2003, the Employment Equality (Age) Regulations 2006 and European Community Legislation, the Equality Act 2010, Equality & Human Rights Commission's Codes of Practice for Employment. This list may not be exhaustive where new legislation is forthcoming.

The Organisation agrees to observe the latter Acts and Codes of Conduct.