



## EQUAL OPPORTUNITIES POLICY

We are an equal opportunity employer and are committed to a policy of treating all our employees and job applicants equally. It is our policy to take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to sex, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, age or perceived age, race, colour, nationality, national origins, ethnic origin or disability.

### Applications

Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has personal responsibility for the implementation of the policy. Any instant of doubt about the application of the policy, or other questions, should be addressed to the Human Resources department, as should any requests for special training.

This policy applies to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment, including general treatment at work and the processes involved in the termination of employment.

Employees must not harass or intimidate other employees on the grounds of race, sex, age or perceived age, religion or belief, disability or sexual orientation. Such behaviour may be treated as gross misconduct in accordance with our disciplinary procedure.

You should draw the attention of your immediate superior to suspected discriminatory acts or practices. Employees must not victimise or harass any employee who has made allegations or complaints of sex or racial discrimination, or discrimination on the grounds of disability, age or sexual orientation. Such behaviour may be treated as gross misconduct in accordance with the disciplinary procedure.

### Procedure

Where increased pay and/or enhanced benefits are offered to employees on the basis of length of service, these are intended to reward loyalty, maintain motivation and reflect higher levels of relevant experience.

Employees should note that the imposition of any provision, criterion or practice which has a disproportionate adverse impact on someone on grounds of his or her sex, race, marital status, civil partnership status, religion or belief, sexual orientation or age will be unlawful unless it can be justified on grounds of business need.

Employees who are disabled or become disabled during the course of their employment should inform the Company about their disability. Management will then arrange to discuss with the employee what "reasonable adjustments" to their job, working conditions or environment could be made to assist them in the performance of their duties. The employee will also be encouraged to suggest any adjustments that they believe would be helpful to them. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable, such adjustments will be made. There may, however, be circumstances where it will not be reasonable or reasonably practicable for the Company to accommodate proposals put forward by the employee.

### Issues

Any member of staff may use the complaints procedure to complain about discriminatory conduct. If the matter relates to sexual or racial harassment, or harassment on the basis of disability, sexual orientation, religion or belief or age, then the complaint may be raised directly with the Human Resources department. No individual will be penalised for raising such a complaint unless the substance of the complaint is untrue or the complaint is made in bad faith, e.g. out of malice.

When an employee is falsely accused of discriminatory conduct, then he or she may implement the organisation's grievance procedure. In this instance, the person who has made the false accusation may be subjected to disciplinary action. In serious cases, such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal in the absence of mitigating circumstances.

### Monitoring

The composition of employment terms and conditions, benefits etc. will be monitored on a regular basis. Should inequalities become apparent positive action may, if appropriate, be taken to redress the imbalance.

This policy will be monitored on a regular basis by the senior management. Where there are issues with the way the policy is working, these will be looked at closely with a view to identifying measures to improve the effectiveness of the policy.

A handwritten signature in black ink, appearing to read "David Baldock", is written over a thin, light-colored line.

David Baldock  
Managing Director  
January 2018