



Policy on Equal Opportunities, Recruitment, Employment, Training and Development

Our strategic commitment to equal opportunities

We influence our stakeholders to apply best practice by practising and demonstrating the Global Sullivan Principles of Fairness at Work. We support the Investors in People principles on equal Opportunity.

We are committed to the principles of equal opportunities in employment and opposed to any form of less favourable treatment or financial reward through direct or indirect discrimination, harassment, victimisation to employees or job applicants on the grounds of race, religious beliefs, political opinions, creed, colour, ethnic origin, nationality, marital/parental status, sex, sexual orientation or disability. We are opposed to any form of less favourable treatment on the grounds of handicap or age and we work towards targets and performance levels for EO in learning participation, recruitment and selection and promoting our brand. We recognise our obligations under the Sex Discriminations Act, The Equal Pay Act, Article 119 of the Treaty of Rome, The Race Relations Act and The Code of Practice published by the Equal Opportunities Commission, the Commission for Racial Equality and the European Commission;

- a) For the elimination of discrimination on grounds of sex, sexual orientation or relationship status or disability and for the promotion of equal opportunity in employment.
- b) For the elimination of racial discrimination and promotion of equal opportunity in employment.
- c) For the elimination of discrimination in pay between men and women who do the same work, or work of a similar nature of work of equal value.

Employment Practices

We accept personal responsibility for adhering to the principles of equal opportunity and maintaining racial harmony. We will actively promote equal opportunities throughout the organisation to ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential skills and abilities. People are recruited and selected, promoted and trained on the basis of objective criteria. We recognise that sexual, racial and other forms of harassment can cause problems at work and we are committed to ensure that unacceptable behaviour does not take place.

Monitoring and Review Arrangements

We monitor our policies to ensure that we pursue an effective policy of equal opportunity. This will include attitude surveys and monitoring of work quality.

Grievance and Disciplinary Procedures.

We ensure that any person who feels that he or she has been treated unfairly or subjected to direct or indirect unfair discrimination can raise the matter through the appropriate grievance procedure when every effort will be made to secure a satisfactory solution. We will ensure that any person making a complaint of unfair discrimination will be protected from any victimisation in any form and we will continue to treat unfair discriminatory conduct by any person as a disciplinary offence.

Training

We train, develop and appraise on the basis of merit and ability and will seek to encourage persons from all races and abilities.

Rehabilitation of Offenders

It is our policy not to discriminate against anyone who has a spent conviction under the rehabilitation of Offenders Act 1974. Under the Act it is unlawful to refuse, to engage or to dismiss on the grounds of a spent conviction. A conviction becomes spent after a period of time that runs from the start of the sentence. It is our policy to comply with the Act.

Equal Pay

We acknowledge that men and women are entitled to be paid equally without any bias on the grounds of sex and that this right is set out in the treaty of Rome and is enforceable under UK Law. All reasonable steps will be taken to ensure that males and females receive equal pay for the same work and for work rated equivalent value and for work of equal value. We will review existing and future pay policies and structures and continue to monitor the impact of such policies and structures. We minimise the possibility of bias on the grounds of sex arising in pay structures and will accordingly fairly pay all persons, justly rewarding everyone for their contributions to our continuing success.

Harassment at Work

Harassment is unsolicited and unwelcome workplace behaviour, which adversely affects the dignity of the recipient. Where the behaviour is motivated by gender, marital status, race, colour, national or ethnic origin, nationality or disability it also amounts to infringement of equal employment opportunity. We are committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing people. Conduct becomes harassment if it persists and it has been made clear that it is regarded as offensive by the recipient, although a single offensive act can

amount to harassment if it is sufficiently serious. Any form of harassment will be considered a potential disciplinary matter.

Sexual Harassment at Work

Sexual harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of sexual nature, or which is based on a person's sex, sexual orientation and which is regarded as unwelcome or offensive to the recipient. The following are examples, which illustrate the sort of conduct, which may be treated as sexual harassment. This is not an exhaustive list:

- Unwanted physical contact, or conduct which is intimidatory, or physically or verbally abusive. Harassment can also be non-verbal, for example, staring or gestures;
- Suggestion that sexual favours may further a person's career, or that refusals may hinder it;
- Sexual advances, propositions, suggestions or pressure for sexual activity at or outside work.
- Derogatory or demanding remarks based on gender, or the display of sexual explicit material in the workplace.

Sexual harassment is a form of denial of equal employment opportunity that has the effect of insulting and demeaning the person who is harassed.

Racial Discrimination

Racial harassment is a particular form of harassment. It is conduct at work directed towards an employee by another employee or group of employees which is of racial nature or which is based on a person's race, colour or origins, and which is regarded as unwelcome or offensive to the recipient.

The following are examples that illustrate the sort of conduct, which may be treated as racial harassment. This is not an exhaustive list.

- Jokes about race.
- Offensive names used.
- References to people by offensive racist descriptions.
- Verbal or physical abuse because of a person's race or colour.
- Detrimental behaviour because of a person's race.
- Denial of opportunity because of race.

A situation of harassment may be resolved informally, by talking directly to the person who is responsible for the harassment. However if a person believes they are the subject of harassment they should make a formal complaint to the manager or if the complaint is about the manager to the next level of management. Depending on the seriousness of the allegation, the alleged harasser may be suspended on full pay while the matter is being investigated under the disciplinary procedures.

A formal complaint of any form will be fully investigated. The alleged harasser will be informed of the complaint, and we will endeavour to ensure that investigation into the sexual harassment is conducted by a worker of the same sex as the complainant. If relevant, as part of the investigation process, witnesses will be interviewed. As far as possible, confidentiality will be maintained throughout the investigative process. Neither complainant nor alleged harasser will be victimised in any way. However, the making of a malicious complaint, which is known to be false, may itself result in disciplinary action against the complainer because it could be regarded as misconduct.

Where an employee is found to have harassed another employee we will decide the appropriate action (if any) in light of all the evidence. Such action may include disciplinary action, dismissal (in serious or repeat cases), a job transfer, or counselling.

The aim throughout is to resolve the complaint of harassment sensitively, impartially, effectively and quickly.

Where a harasser is retained in employment, we will monitor the situation to ensure that the harassment has stopped. It is a disciplinary offence to victimise or retaliate against a person who has, in good faith, made, supported or assisted in the making of a complaint or harassment. There will be no victimisation of any person for making or supporting or assisting a complaint of harassment – even if the complaint is not upheld- provided the action was taken in good faith.

Signed:  Date: 21 March 2012

Position: Director

Approved for annual review on: 20 March 2013





Our Principles

As a company which endorses the Global Sullivan Principles we will respect the law, and as a responsible member of society, we apply these Principles with integrity consistent with the legitimate role of business. We develop and implement company policies, procedures, training and internal reporting structures to ensure commitment to these Principles throughout our organisation. We believe the application of these Principles will achieve greater tolerance and better understanding among peoples, and advance the culture of peace.

Accordingly, we will

- ✓ Express our support for universal human rights and, particularly, those of our employees the communities within which we operate, and parties with whom we do business.
- ✓ Promote equal opportunity for our employee at all levels of the company with respect to issue such as colour, race, gender, age, ethnicity or religious beliefs, and operate without unacceptable worker treatment such as the exploitation of children, physical punishment, female abuse, involuntary servitude, or any forms of abuse.
- ✓ Respect our employees' voluntary freedom of association.
- ✓ Compensate our employees to enable them to meet at least their basic needs and provide the opportunity to improve their skill and capability in order to raise their social and economic opportunities.
- ✓ Provide a safe and healthy workplace, protect human health and the environment; and not offer, pay or accept bribes.
- ✓ Work with governments and communities in which we do business to improve the quality of life in those communities- their educational, cultural, economic and social well being- and seek to provide training and opportunities for workers from disadvantaged backgrounds.
- ✓ Promote the application of these Principles by those with whom we do business.

We are transparent in our implementation of these principles and provide information which demonstrates publicly our commitment to them. This policy is approved and reviewed annually.

Reviewed annually by Corin Dudley, Managing Director, 21st March 2012