

EQUAL OPPORTUNITIES AND DISCRIMINATION

Equal Opportunity and Dignity at Work Policy

The Company is committed to a policy of equal opportunities for all staff. We will not discriminate on the grounds of gender, gender reassignment, race, age, nationality, ethnic or national origin, marital status, sexual orientation, disability or religion. This encompasses every aspect of our business including recruitment, training, remuneration, access to benefits, career progression or any other employment matter including selection for redundancy and/or dismissal.

The Company is committed to taking all steps necessary to prevent all types of unlawful discrimination in the workplace and take positive action to promote equal opportunities for everyone within or applying to join the Company. Our aim is to select, recruit, train, promote and reward on the basis of merit, competence and performance.

The maintenance of an equal opportunities environment is every employee's responsibility. As a consequence, everyone working for the Company is required to:

- ensure they treat everyone: colleagues and clients, fairly and without bias;
- focus on what people can do rather than on what they cannot;
- recognise, accept and value people's differences and ability;
- not stereotype or generalise about people or groups of people;
- listen and respect everyone's views regardless of their background, sex or experience;
- draw attention to any discriminatory acts or practices; and
- carry out duties at all times with due regard to the Company's equal opportunities policy.

All employees are required to follow this policy. The Company will not tolerate discrimination or harassment, and failure to follow our policy may lead to disciplinary action and, in some cases, dismissal.

If you do not understand what your individual responsibilities are having read this policy or that you consider yourself a victim of discrimination, then speak to your manager in the first instance.

You should read and be familiar with this paragraph, together with the Company's policy on discrimination below.

Discrimination Policy

In accordance with the Company's policy on equal opportunities, the Company will not tolerate or condone discrimination or harassment whether it be based on gender, gender re-assignment, race, age, colour, nationality, ethnic or national origin, marital status, sexual orientation, religion, disability, sex or marital status, part-time status or for any other unlawful reason.

Unlawful discrimination is not permitted in any aspect of employment including (but not limited to) recruitment, selection, promotion, transfer, training, pay and benefits, redundancy, dismissal, and terms and conditions of work. The terms "discrimination", "victimisation" and "harassment" are explained below.

The Company expects all employees and other individuals working for the Company to take personal responsibility for upholding the Company's high standards by treating all job applicants, fellow employees, temporary staff, clients and any other individuals associated with the Company with dignity and respect. This will help to ensure everyone working for, and with the Company, has the opportunity to enjoy a positive, effective and professional workplace free of discrimination.

Appropriate disciplinary action including in the most serious cases dismissal, will be taken against any employee who breaches this policy.

Please be assured that you will not be victimised for bringing a complaint of unlawful discrimination in good faith and the Company will treat any retaliation against you as a serious disciplinary matter.

What is Discrimination?

You need to know that discrimination comes in two forms:

- **Direct discrimination:** where one person is treated less favourably than another because of, for example, their gender or their race; and
- **Indirect discrimination:** the definition differs depending on the alleged discrimination involved but in general, indirect discrimination occurs where an employer has a provision, criterion or practice which the employer applies equally to employees but which puts or would put an individual at a particular disadvantage when compared to others because of a difference in their sex or race or other unlawful reason, which causes that individual to actually suffer that disadvantage and where the employer cannot show its actions are a proportionate means of achieving a legitimate aim (such as business re-organisation or rewarding long service).

Linked to direct and indirect discrimination are two other prohibited forms of activity, that of victimisation and harassment:

- **Victimisation:** where someone is treated less favourably because they have made or are about to bring or support a discrimination claim against the Company or any of its employees.
- **Harassment:** Unwanted conduct on the basis of a prohibited ground (i.e. sex, sexual orientation, disability, race, age, gender reassignment, ethnic or national origins or religion or belief) which has the purpose or effect of violating another person's dignity or creating intimidating, hostile, degrading, humiliating or a defensive environment for that person.

You should be aware that the Company will not tolerate any form of discrimination, victimisation or harassment.

You should note that in relation to disability discrimination legislation, broadly speaking, a "disability" covers a long term physical disability or mental impairment which has a substantial and long-term adverse effect on an individual's ability to carry out normal day-to-day activities. The Company is committed to assist disabled staff regardless of the nature of the disability whether it is a physical impairment, a mental one or a clinically well recognised illness. The Company will attempt to make reasonable adjustments as required by law to ensure that an individual can continue to work for the Company.

What is Harassment?

Under the discrimination laws, harassment includes a wider variety of conduct. If your behaviour violates the dignity of another or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person, whether in the workplace, at an employment related social event, on a business trip or on other social occasions linked to work, you can expect the Company to take action to stop the behaviour and deal with it appropriately.

Harassment on any of the prohibited grounds (sex, sexual orientation, race, disability, nationality, ethnic origin, age, gender reassignment, religion or belief) will amount to unlawful discrimination. Harassment can be physical, verbal or non-verbal conduct in the workplace and may or may not be directed at you. Examples include:

- insensitive jokes and pranks;
- unacceptable nicknames and name-calling;

- bullying, assault or intimidation;
- derogatory comments, abuse or gestures, leering, wolf-whistling or staring;
- the display or circulation of offensive material, graffiti, e-mail messages, graphics or objects whether made direct to, or about, a third party;
- offensive or demeaning remarks, or conduct, including comments about appearance or dress;
- unwelcome comments of, e.g. a sexual or racial nature, such as sexual advances, propositions, suggestions or pressure for sexual favours at or outside work when it has been made clear that such suggestions are unwanted or unacceptable;
- unwanted comments relating to disability and/or jokes concerning disability or mimicking disabled people;
- victimisation of a fellow colleague;
- engaging in any form of unwanted verbal, non verbal or physical conduct of a sexual nature; and
- if a sexual approach is rejected, then treating that person less favourably than that person would have treated them had that person not rejected or submitted to that conduct.

One of the problems frequently encountered in the workplace is that a series of small incidents occur which in themselves may seem trivial but, over a period of time, the accumulation of those incidents can cause serious harm on an individual's well-being.

How should you act towards others? As a guide, you should act in a manner that you would like to be treated yourself. If an individual says "no" to any advance or treatment or raises an issue with you about your behaviour, rather than consider it an affront or insulting, accept what that individual says and stop that behaviour. More often than not, that will be the end of the matter.

If you consider an individual's conduct towards you is inappropriate or offensive, you should raise that with the individual immediately. Alternatively, if you feel unable to confront an individual, you should contact your manager or the Human Resources Department in the first instance. If the individual's conduct persists or if the problem is not resolved to your satisfaction, you may want to consider raising a formal grievance in accordance with the procedure. In all situations, please make sure you provide the following information:

- the name of the person who you consider has discriminated against or harassed you or a third party;
- the nature of the discrimination or harassment;
- dates and times when the discrimination or harassment occurred;
- names of witnesses to any instances of discrimination or harassment; and
- any action which you have already taken to stop the discrimination or harassment.