

## Equal Opportunities and Fair Treatment Policy

### Policy

The success of the Group depends upon our people. Capitalising on what is unique about individuals and drawing on their different perspectives and experience adds value to our business. The Company aims to recruit and develop talent from the widest talent pool and create an environment which is sensitive to and maximises individual differences, where everyone has a fair chance to succeed.

The Company is committed to being a fair and inclusive employer. To achieve this we have policies and procedures to ensure that our employees understand and carry out what is expected of them.

As an Equal Opportunities Employer, no worker or potential worker is treated less favourably on the grounds of their disability, race, colour, religion or belief, nationality, ethnic origin, sex, sexual orientation, gender re-assignment, pregnancy, age, marital or civil partner status, employment status (including the fact that they may be a part-time or fixed term worker) or membership or non membership of a trade union. No-one is disadvantaged by any condition of employment or company requirement that is not necessary for operational reasons.

The Company shall at all times strive to work within legislative requirements as well as promoting best practice.

This policy applies to all of the Company's employees, whether permanent, temporary, casual, part time or on fixed term contracts, to job applicants and to individuals such as agency staff and consultants who work at the Company (collectively "workers").

The Company recognises that all workers have a right to work in an environment in which the dignity of all is respected and which is free from harassment and bullying. It is committed to preventing and eliminating intimidation in any form.

In order to promote and maintain equality of opportunity and to eliminate discrimination the Company ensures that:

- All potential and current employees, workers, customers, partners and stakeholders are treated fairly and with respect.
- All individuals have the right to work in an environment free from discrimination. Harassment, victimisation and bullying or any other form of unwanted behaviour will not be tolerated.
- No one is disadvantaged by conditions, requirements or practices which cannot be shown to be justifiable.

- All decisions relating to recruitment, selection, development and promotion are made according to an individual's ability and based on merit.
- All employees have an equal chance to contribute and achieve their potential.
- Information and training will be provided as necessary to workers to make sure that discrimination, harassment, victimisation and bullying are avoided and the provisions of this policy are complied with.
- Support is provided to those employees who have a specific responsibility for ensuring compliance with this policy and who may be involved in dealing with any complaints that arise.

This policy aims to ensure that if inappropriate and unacceptable behaviour does occur, it will be dealt with in a serious, sensitive and confidential manner, so that the matter can be resolved as quickly as possible for all concerned.

## **Harassment and Bullying**

### **Harassment**

Harassment is a form of discrimination which can be defined as conduct which is unreasonable, unwelcome and offensive, or which creates an intimidating, hostile or humiliating working environment.

Whether the action was intended to cause offence or not, if the worker subjected to the behaviour finds it unacceptable and he or she feels damaged or harmed by it, this potentially constitutes harassment.

### **Bullying**

Bullying means persistent or repeated unwarranted criticism, threats, abusive or insulting words, behaviour or written signs, either in public or private, which humiliate and affect the dignity of the individual. Bullying is identified by the effect on the worker.

The following are examples of bullying:

- Verbal abuse
- Excluding or isolating individual's
- Psychological harassment
- Assigning individual's meaningless tasks unrelated to their job
- Giving individual's impossible assignments
- Deliberately withholding information that is vital for effective work performance

This list is not exhaustive.

## **Disciplinary Measures**

Disciplinary action, up to and including dismissal, will be taken where an employee is found to have committed an act of unlawful discrimination, harassment or bullying.

## **Scope of the Policy**

### **Terms and Conditions of Employment**

The Company will continually review terms and conditions to ensure that they do not discriminate unfairly.

### **Recruitment and Selection**

The Company aims to ensure that no job applicant receives less favourable treatment for any of the grounds set out in the third paragraph of this policy. Recruitment and selection criteria are reviewed regularly to ensure this. Entry into the Company is determined solely by the application of objective criteria and individual ability.

### **Promotion**

Progression through the Company will be determined solely by the application of objective criteria, personal performance and merit.

### **Training and Development**

All employees are entitled to equal access to training and development opportunities. Individual training needs are discussed as part of the annual appraisal process. Individuals may also apply for courses or development opportunities through their line manager. Managers are responsible for ensuring equality of access to training and development opportunities.

### **Disciplinary and Grievance Handling**

The Company will ensure that any disciplinary action taken is as a result of misconduct or poor performance and as such are based on objective criteria. The Company will ensure that disciplinary procedures are carried out fairly in respect of those workers to whom they apply. All grievances raised will be dealt with fairly and consistently.

### **Performance**

Monitoring of performance will be done through the effective setting and reviewing of objectives and overall performance.

### **Termination of Employment**

The Company will monitor redundancy criteria and procedures to ensure that they are fair and objectives and do not directly or indirectly discriminate.

The Company is committed to monitoring the application of equal opportunities. Procedures will be regularly reviewed and where necessary they will be amended to ensure that everyone is treated fairly.

## **Responsibilities of Managers**

It is the responsibility of managers to ensure that no unlawful discrimination or unacceptable behaviour takes place and to lead by example. Every manager has an obligation to prevent harassment / bullying and to take immediate action if it is identified.

Allegations of discrimination, harassment or bullying received either informally or formally through the Grievance Procedure must be dealt with promptly and sensitively. It may not always be appropriate for a line manager to be involved with a specific complaint. For example, if the complainant is male and wishes to speak to a male, but the manager is female or, if the complaint relates to the conduct of the line manager. In such instances, the matter should be referred to the HR Department.

## **Responsibilities of all Workers**

Promoting inclusion and eliminating any form of discrimination depends on the personal commitment of all workers, who must accept their personal responsibility in the implementation of this policy.

Deliberate failure to observe the requirements of this policy will (where applicable) be subject to disciplinary action through the Company's disciplinary procedure.

## **Handling Complaints of Discrimination/Harassment/Bullying**

Managers will support any employee who complains about harassment, bullying or discrimination at work and will make sure that a full investigation takes place.

If an employee is harassed, bullied or suffers discrimination at work, they may want the matter to be dealt with informally at first. If the situation cannot be resolved informally then the complainant has the right to pursue his or her complaint formally via the Company's Grievance Procedure.

The Manager or HR Manager will discuss the matter with the complainant and agree a course of action. At any meeting the complainant may be accompanied by a Trade Union representative or a colleague. The alleged harasser also will be given the opportunity to state their version of events to the manager and to also be accompanied by a Trade Union representative or colleague.

The complainant must be assured that he/she will not be discriminated against or victimised for raising a complaint in good faith. False allegations of a breach of this policy may however be considered a disciplinary offence. Where possible, confidentiality will be observed. However, there may be occasions when the Company cannot guarantee confidentiality and/ or where allegations are sufficiently serious that the Company must investigate them and cannot (possibly due to the nature of the allegations) guarantee confidentiality. If you have any concerns about this you should contact the HR Department.

## **Employee Assistance Programme**

If an employee feels that they have been harassed, bullied or discriminated against they may wish to use the confidential helpline for information and support, where confidentiality can be guaranteed. Also support is available from the HR Department who are available to:

- suggest ways on how to deal with the complaint
- help to resolve the problem informally
- advise on the Grievance Procedure
- where appropriate (i.e. where it has been requested by an individual that a complaint is not dealt with via formal procedures and that HR assists with an intervention on the employee's behalf) seek an undertaking from the "offender/s" to stop the behaviour which is causing the problem.

## **Communication**

The Company is committed to ensuring that this policy is effective and that all workers are informed of this policy.

The Company reserves the right to change or amend this policy from time to time.