



D11. EQUAL OPPORTUNITIES & DIGNITY AT WORK POLICY

Introduction

The Company aims to be an equal opportunities employer and undertakes to apply objective criteria to assess merit. It aims to ensure that no job applicant or employee receives less favourable treatment on the grounds of race, colour, national or ethnic origins, sex, marital status, sexual orientation or perceived sexuality, disability, membership or non-membership of trade union, "spent convictions" of ex-offenders, class, age, politics, religion or belief or because of a 'Protected Characteristic'.

Selection criteria and procedures will be reviewed to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities.

All employees will be given equal opportunity and, where appropriate and possible, special training to enable them to progress within the Company. The Company is committed to a programme of action to make this policy effective, to minimise the possibility of discrimination and find means of combating it whenever it arises. Discrimination may occur by association, directly or by perception. Employees should be aware of contravening this policy either purposely or inadvertently, particularly when using social networking websites, instant messaging, video sharing and blogs at any time, including personal use on your own computers, smart phones and other hand-held devices outside the workplace.

Definitions - 'Protected Characteristics'

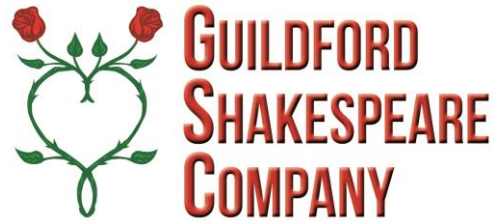
- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion and Belief
- Sex
- Sexual Orientation

Direct Discrimination occurs when a person is treated less favourably than others in similar circumstances because of a protected characteristic.

Indirect Discrimination occurs when a provision, criterion or practice, which is applied to everyone, puts or would put those having a relevant protected characteristic at a particular disadvantage and that provision, criteria or practice is not a proportionate means of achieving a legitimate aim.

Harassment may be direct, by association or by perception and is defined as unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating hostile, degrading, humiliating or offensive environment for that individual.

Victimisation is defined as singling out of an individual for harsh treatment, or unfair action/sanction.



The Company's Responsibility as an Employer

In order for the Equal Opportunities Policy to be fully effective, the responsibility for ensuring that its terms are adhered to will lie with the management. It is, however, the responsibility of each staff member actively to promote equality of opportunity within their own programmes and spheres of responsibility.

The Company will take disciplinary action against employees who are found to infringe its Equal Opportunities Policy.

What the Company expects from its Employees

While the main responsibility for providing equal opportunity lies with the Company, individual employees at all levels have responsibilities too. Getting rid of discrimination depends on everyone's collaboration.

Employees should not harass, abuse or intimidate other employees on any grounds including those of race, colour, national or ethnic origins, sex, marital status, sexual orientation or perceived sexuality, disability, membership or non-membership of trade union, "spent convictions" of ex-offenders, class, age, politics, religion or belief or because of any protected characteristic.

Employees should co-operate with measures introduced by the Company to make sure there is equal opportunity and non-discrimination. Employees must not victimise individuals because they have made complaints or provided information about discrimination or harassment.

Harassment

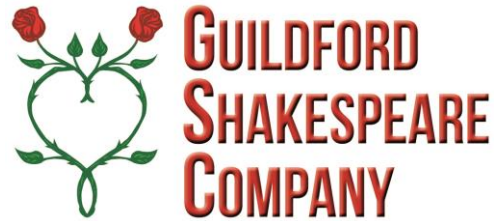
The Company will not condone harassment of any employee within the Company whether these acts are committed by members of the public or by colleagues. Nor will the Company condone any acts of harassment by employees against members of the public.

Individuals suspected of harassment will be liable to disciplinary action which may lead to dismissal.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

D12. SEXUAL HARASSMENT

Unwanted/unwelcome sexual advances or promises/threats related to sexual activities will be considered as a serious offence under the disciplinary procedure. Such conduct includes both physical action and verbal comment of a sexual nature, independent of gender. It includes such action comment or conduct which is carried out and the effect of it violates dignity or creates an intimidating environment. The appropriate penalty for such an offence will be either a final written warning or dismissal.



Any allegation of harassment will be dealt with seriously and confidentially and employees making such an allegation will be protected against victimisation.

D13. DISABILITY DISCRIMINATION POLICY

The guidance in relation to Disability is intended only as a statement of policy, and it does not form part of the contract of employment or otherwise have contractual effect.

In line with the Equality Act 2010 it is the Company's policy not to discriminate against disabled persons whether in, or applying for, employment. To achieve this policy the following procedures must be applied:

- a. Job advertisements will provide equal opportunity to all applicants and will not discriminate in any way against disabled persons.
- b. Disabled applicants for employment will not be considered less favourably than those without disabilities, except where there is an intrinsic requirement or substantial reason preventing employment.
- c. Consideration will be given to making reasonable adjustments, where practicable, to the workplace and methods of working to accommodate disabled applicants.
- d. Appointments of disabled people will be made on the same terms and conditions as other comparable employees without disabilities.
- e. Disabled employees will be given equal opportunity in applications for training and promotion and will not be considered any less favourably because of their disability.

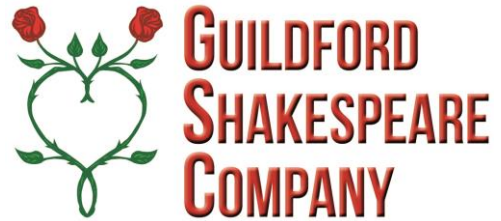
Consideration will be given to making reasonable adjustments, where practicable, to the workplace and to methods of working to accommodate disabled employees. In order to be able to do this, there is a responsibility on employees to make the Company aware if they have any impairments/conditions, which may constitute a disability under the terms of the Act.

Allegations of discrimination on the grounds of disability will be investigated and disciplinary action will be taken against anyone found to have acted in any way which is in breach of this policy.

D14. AGE EQUALITY

The guidance in relation to Age Equality is intended only as a statement of policy, and it does not form part of the contract of employment or otherwise have contractual effect.

The Company will provide a working environment free from discrimination on the grounds of age and recognises the valuable contributions made by staff of all ages. The Company will not discriminate on the grounds of age in the way it recruits and selects staff. Advertisements will not state an age range, unless it is to take positive steps to welcome applications from older people, or younger people, where under-represented.



All those involved in selection processes, will be trained in equality principles. Dates of birth will only be used for monitoring purposes or to comply with any specific legal requirement or other external justifiable requirement.

In order not to discriminate against young workers, the Company will recognise skills and potential, as well as experience.

All instances of age discrimination or age harassment will be logged, and will be taken as seriously as any other discrimination claim. Age harassment is viewed as a serious offence and may lead to dismissal.

All employees shall have equal rights to training, promotion and other aspects of career development. Age will not be used to justify a failure to promote or train any employee.

The Company will ensure that there is no age discrimination in relation to dismissal of staff. In particular, if a redundancy situation occurs, the Company will ensure that age is not a factor in the selection of those to be made redundant.

All personnel are responsible for taking the lead in challenging discriminatory behaviour on the part of managers or staff and creating a positive, inclusive ethos.

You are responsible for ensuring that:

- i) You do not do anything that discriminates against anyone on the grounds of or because of their age;
- ii) Any acts of discrimination on the grounds of age are reported to a manager.

If, in the course of your work, you suffer age discrimination from members of the public, the Company will take appropriate action and provide appropriate support.

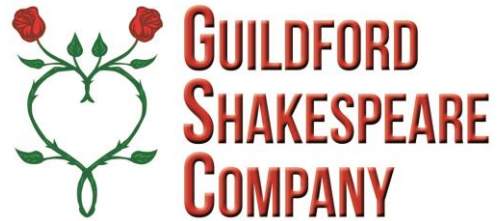
D15. REPORTING COMPLAINTS

This process is intended only as a statement of policy, and it does not form part of the contract of employment or otherwise have contractual effect.

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation or age or from employees who have undergone gender reassignment, are married, have entered into a civil partnership or have a disability.

With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you wish to make a complaint of discrimination or harassment, you should follow the following steps:



- 1) First of all, report the incident of discrimination or harassment to your line manager. If you do not wish to speak to your line manager, you can instead speak to an alternative manager.
- 2) Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.
- 3) All allegations of discrimination or harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. For example, the identity of the complainant and the nature of the allegations must be revealed to the alleged harasser or discriminator so that he or she is able to fairly respond to the allegations. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

The Company will also invite you to attend at least one meeting at a reasonable time and place at which your complaint can be discussed. You must take all reasonable steps to attend that meeting and you have the right to be accompanied at it by either a trade union official or a fellow employee of your choice.

Once the investigation has been completed and after the meeting with you has taken place, you will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. You will also be notified in writing of your right to appeal against the Company's decision if you are not satisfied with it. The Company is committed to taking appropriate action with respect to all complaints of discrimination or harassment which are upheld.

If you wish to appeal against the Company's decision, you must appeal in writing, within five working days of the Company's decision. On receipt of an appeal, another manager (who should not be the person to whom you addressed your original complaint) shall make arrangements to hear it at an appeal meeting and at that meeting you may again, if you wish, be accompanied by either a trade union official or a fellow employee of your choice. You must take all reasonable steps to attend that meeting. Following the meeting, you will be informed in writing of the Company's final decision on your appeal.

You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

If your complaint is upheld and the harasser or discriminator remains in the Company's employment, the Company will take all reasonable steps to ensure that you do not have to continue working alongside him or her if you do not wish to do so. The Company will discuss the options with you.

If your complaint is not upheld, arrangements will be made for you and the alleged harasser or discriminator to continue or resume working and to repair working relationships. Alternatively, you may if you wish use the Company's grievance procedure to make a complaint.