



EQUAL OPPORTUNITIES POLICY

Our Commitment

The Company is committed to providing equal opportunities to all employees and prospective employees. The Company aims to create a working environment in which all individuals are able to use their skills, free from discrimination and harassment, and in which all decisions are based on merit.

All employees have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass/bully others, regardless of their status.

This policy does not form part of any employee's contract of employment and may be amended at any time.

It is unlawful to discriminate on the basis of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership (the "Protected Characteristics").

The principles of non-discrimination and equality of opportunity should also apply to the way in which employees treat visitors, clients, customers, suppliers and former employees.

Scope of this Policy

The Company aims to avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and termination of employment.

Forms of Discrimination

Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the Protected Characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice (such as a policy) that also puts other people with the same Protected Characteristic at a particular disadvantage and such discrimination cannot be justified. For example, a requirement to work full time puts women at a particular disadvantage because they

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generally have greater childcare commitments than men, unless the requirement can be objectively justified.

Harassment related to any of the Protected Characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

Recruitment and Selection/Training and Promotion

We aim to ensure that no candidate suffers discrimination because of any of the Protected Characteristics above.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job and individuals will be assessed on their skills and merits, taking account of any reasonable adjustments that may be required for candidates with disabilities.

Candidates should not be asked about health or disability before a job offer is made. However, there are limited exceptions which should only be used with HR approval. For example:

- questions necessary to establish if a candidate can perform an intrinsic part of the job (subject to reasonable adjustments as mentioned above);
- Equal Opportunities monitoring (which will not form part of the decision making process); and
- questions to establish if an applicant is fit to attend an interview or whether any reasonable adjustments need to be made.

Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular Protected Characteristic from applying, and we take steps to ensure that our vacancies are advertised to a diverse labour market.

Our recruitment procedures are reviewed regularly to ensure they comply with the aims of this policy. We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality.

All employees and prospective employees, regardless of nationality, must be able to produce original documents to satisfy ID requirements and their ability to work in the UK, before employment starts, to satisfy current immigration legislation.

Working Practices

The Company also aims to consider any indirect discrimination in relation to its standard working practices, including the number of hours to be worked, the times at which these are to be worked

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and the place at which work is to be done, when considering requests for variations to these practices. The Company will only refuse such requests if the Company considers it has good business reasons for doing so.

Termination of Employment

We will ensure that any redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory

We also aim to ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Disability and Discrimination

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We will consider the matter carefully and try to accommodate your needs within reason.

We continually monitor the physical features of our premises to consider whether they place disabled workers, job applicants or 3rd parties at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and customers.

Customers, Suppliers and Other People not Employed by the Company

The Company will not tolerate discrimination, bullying or harassment towards its employees from any 3rd party. Employees should report any instances of discrimination, bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

Your Responsibilities

Every employee is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination or harassment in the workplace.

Employees can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination or harassment.

Acts of discrimination, harassment, bullying or victimisation against employees or 3rd parties are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Grievances

If you consider that you may have been unlawfully discriminated against, harassed, bullied or victimised you may use the Company's grievance procedure to make a complaint.

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The Company will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Any person who alleges unlawful discrimination, supports someone to make a complaint, or gives evidence in relation to a complaint, will not be victimised as a result.

A handwritten signature in black ink, appearing to read 'S Parkin', with a large loop at the end.

S Parkin

Chief Executive Officer