

Confidential

Sep 2016 HR04.1 1

EQUALITY & DIVERSITY POLICY

Policy Statement

The Company is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are known as the "protected characteristics".

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying. Serious breaches of this policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

Direct discrimination

Direct discrimination occurs when, because of a protected characteristic, an employee or job applicant is treated less favorably than other employees or job applicants are treated or would be treated. The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

Indirect discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group. The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Company is committed to applying its policy at all stages of recruitment and selection.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic. The selection process will be carried out consistently for all jobs at all levels.

Where a job applicant has a disability, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.



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Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

Equal pay

The Company is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavor to maintain a pay system that is transparent, free from bias and based on objective criteria.

Monitoring

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.