

Ethics, Conduct & Equal Opportunities Policy

Policy Statement

Equality and diversity is about respecting difference. We treat all employees, customers, job applicants, contractors, suppliers and visitors fairly, equally and with respect. Reasonable adjustments will be made to accommodate those with additional needs.

It is the company's policy to provide equal opportunities irrespective of race, colour, nationality, ethnic or national origin, sex, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender re-assignment, religion or belief.

All employees must behave in a responsible manner. Under no circumstances will discrimination, harassment, bullying or behaviour which is likely to cause offence be tolerated by the company. Any breach must be reported to your manager.

All allegations of discrimination, bullying or harassment will be thoroughly and promptly investigated. Where allegations are substantiated, appropriate disciplinary action up to and including dismissal will be taken against any person responsible.

The company is committed to equality of opportunity for all job applicants. The company will therefore consider for employment ex-offenders with spent criminal convictions on their individual merits. The company's approach towards employing ex-offenders differs depending on whether the job is or is not exempt from the provisions of the Rehabilitation of Offenders Act 1974. Under that Act it is unlawful to refuse to engage a job applicant or to dismiss an Employee on the grounds of a spent

conviction. A conviction becomes spent after a period of time that runs from the start of the sentence. The period of rehabilitation is related to the type and length of the sentence, not to the offence. However, if the job into which the company is seeking to recruit is one of the excluded occupations and professions listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended), the job applicant must disclose all convictions, whether spent or unspent, and the company may exclude from employment or dismiss any such person because of a criminal conviction.

Recruitment

All terms and conditions of employment and related benefits shall be non-discriminatory, except in cases where there is a legal requirement that the job holder is of a specified gender or where health and safety regulations apply.

All applicants for employment and all employees applying for alternative positions or promotion within the company shall be assessed according to their skills, experience and ability to do the job.

When vacancies are advertised, both internally and externally, the company will continue to ensure that such advertising, both in placement and content, is compatible with the terms of this policy.

Internal applicants for vacancies should expect a full review of their work history, including their work performance, salary history and other information in their personnel file.

With disabled job applicants, the company will have make reasonable adjustments to



work provisions, criteria or practices, or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Employment Verification & References

We will provide information to prospective external employers and others regarding any dates of employment and positions held. We will also verify the accuracy of salary information released by the employee.

Employees or former employees should refer those seeking employment verification to their manager.

Training & Development

Equal consideration will be given to all employees for training opportunities, both to perform their job and to develop personally.

Employees will receive an annual performance appraisal and will be reviewed against relevant, objective criteria to measure performance and identify training needs. Any development needs or other training issues arising from the appraisal will be recorded on an Individual Development Plan.

Promotion prospects will be governed by individual merit, ability, achievement and development potential.

The company will train, develop and promote on the basis of merit and ability only.

Increases in remuneration package are not automatic and will depend upon the company's business situation and industry outlook, as well as upon the employee's individual performance. It must also be recognised by all employees that, should their overall remuneration package be increased, this may be through enhanced benefits rather

than or as well as an increase in salary.

The company will ensure all managers are aware of the company's equal opportunities policy to help them identify and deal with acts of discrimination, harassment or bullying. Managers will be responsible for ensuring they actively promote equal opportunities within the departments for which they are responsible.

The Company will also ensure all employees understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment that is free of bullying and harassment.

Post-Employment Discrimination

The Company will not discriminate against any former employee on the basis of their race, colour, nationality, ethnic or national origin, sex, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender re-assignment, religion or belief; for example, when providing references for future employment, or in conducting the appeals procedure for any former employee.

Monitoring

The Company will, from time to time, review the Equal Opportunities Policy and its progress in achieving its objectives. Where barriers to equal opportunities are identified, any necessary changes will be made to this policy.

Discrimination Grievances

If you believe that you have been subjected to direct or indirect discrimination, you should invoke the company's grievance procedure as set out in this handbook.

In view of the sensitivity of this subject, you



may, if preferred, approach the Managing Director directly rather than your own manager. In either case, the company will treat the matter as strictly confidential.

Harassment & Bullying Policy Statement

It is the Company's policy to maintain a non-discriminatory working environment that is free from harassment or bullying based on race, colour, nationality, ethnic or national origin, sex, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender re-assignment, religion or belief.

Employees must not harass, bully or intimidate other employees on these grounds. Such harassment not only contravenes the company's policy but it may also constitute unlawful discrimination. Such behaviour will be treated as gross misconduct under the company's disciplinary procedure and could render the employee liable to summary dismissal. Employees should bear in mind that they can be held personally liable for any act of unlawful harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

All employees are responsible for conducting themselves in accordance with this policy and the company will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees or by outside third parties who do business with the company, such as clients, customers, contractors and suppliers. The company will take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.

It is the responsibility of all employees to eliminate any harassment, bullying or intimidation of which they are aware by

informing their manager immediately. All allegations of harassment or bullying will be thoroughly and promptly investigated. Where allegations are substantiated, appropriate disciplinary action up to and including dismissal will be taken against any person responsible. We will also take appropriate action against any third parties who are found to have committed an act of harassment or bullying against our employees.

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, business trips and work-related social events.