

## COMPANY POLICY

### EQUAL OPPORTUNITIES

#### Policy Statement

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

It is the policy of the Company to take all responsible steps to employ and promote employees on the basis of their abilities and qualifications without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, age, marital status and/or disability. The Company will appoint, train, develop and promote on the basis of merit and ability alone.

Employees have a duty to co-operate with the Company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Action under the Company's disciplinary procedure will be taken against any employee who is found to have committed an act of improper discrimination. Serious breaches of the equal opportunities policy will be treated as gross misconduct and could render the employee liable to summary dismissal.

Employees must not harass or intimidate other employees on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, age, marital status or disability. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure.

Employees should draw the attention of their Line Manager to suspected discriminatory acts or practices. Employees must not victimise or retaliate against an employee who has made allegations or complaints of sex or race discrimination, or discrimination on the grounds of disability, religion or belief, age, sexual orientation, or provided information about such discrimination. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

#### Sources of recruitment

The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.

#### Advertisements

Recruitment publicity must positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas of publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, religion or racial group;
2. Avoid prescribing any unnecessary requirements which would exclude a higher proportion of particular gender, sexual orientation, religion or racial group;
3. Avoid prescribing any requirements as to marital status;
4. 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 of any particular gender, sexual orientation, religion or race;
5. The Company will not recruit new employees solely on the recommendation of an existing employee;

6. The setting of age limits, as a matter of general recruitment policy or as a criterion of any specific job, must be justifiable and non-discriminatory.

### **Selection methods**

The selection process will be carried out consistently for all jobs at all levels. The Company will ensure that this Equal Opportunities Policy is available to all staff and in particular is given to all staff with responsibility of recruitment, selection and promotion. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do so, or to train for, the job in question. With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work arrangements 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.

### **Selection tests**

Selection tests which are used will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual or inherent ability to do or to train for the work or career. Thus, questions or exercises on matters which may be unfamiliar to racial minority applicants or applicants of a particular sex, sexual orientation or religion, will not be included in the tests if they are unrelated to the requirements of the particular job. The tests which are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

### **Applications and interviewing**

All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

Wherever possible, all applicants will be interviewed by at least two people. All questions that are put to the applicants will relate to the requirements of the job.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about race, religion, sex, age, national origin, disability, sexual orientation, marital status, children and domestic obligations.

### **Training, transfer and promotion**

The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction for all Line Managers in order to familiarise them with the Company's policy on equal opportunities, and in order to help them identify discriminatory acts of practices and to ensure that they promote equal opportunity within the departments for which they are responsible.

All persons responsible for selecting new employees, employees for training, or for transfer to other jobs, will be instructed not to discriminate on gender, or racial grounds of the employee's, disability, age, religion, or sexual orientation.

Where promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory. The promotional system will be checked from time to time in order to assess how it is working in practice. When a group of workers predominantly of one race, religion, sex or sexual orientation is excluded from access to promotion, transfer and training and to other

benefits, the promotional system will be reviewed to ensure that there is no unlawful indirect discrimination.

When ability and personal quality are the main requirements for promotion to a post, care will be taken to consider favourable candidates of all races, religions, sexual orientations and both sexes with different career patterns and general experience.

### **Terms of employment, benefits 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 discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, age, marital status, or disability.

### **Grievances and complaints**

All allegations of sex or racial discrimination or discrimination on the grounds of disability, religion or belief or sexual orientation will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints from members of a particular sex, sexual orientation, religion or racial group or from employees who are disabled.

### **Monitoring and opportunity**

The Company will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved. The Company will, from time to time, look at:

- The sex, sexual orientation, religion and ethnic composition of the workforce of each department and changes in distribution over periods of time.
- The selection decisions for recruitment, promotion, transfer and training, according to the sex, sexual orientation, religion or racial group of candidates, and the reasons for those decisions.

The Company will, from time to time, review the selection criteria and personnel procedures to ensure that they do not include provisions, criteria or practices which constitute, or may lead to, unlawful indirect discrimination.