

The Company is fully committed to providing a harmonious working environment in which employees are able to maximise their full potential and to contribute to business success, irrespective of their gender, race, disability or marital status.

The Company is committed to identifying and eliminating discriminatory practices, procedures and attitudes throughout the organisation. The Company believes that all employees are entitled to be treated with dignity and respect whilst at work and also when representing the business in any capacity outside of work. The Company expects employees to support this commitment and to assist in all possible ways.

The aim of this policy is to prevent discrimination, provide guidance to resolve any problem should it occur and prevent recurrence.

Preventing Discrimination in Employment

The Company endeavours to ensure that no employee or job applicant is discriminated against, either directly or indirectly, on the grounds of gender, race, nationality, ethnic origin, marital status or disability. The commitment applies to all the aspects of employment outlined below:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Training.
- Promotion and career development opportunities.
- Terms and conditions of employment, and access to employment related benefits.
- Grievance handling and the application of disciplinary procedures.
- Selection for redundancy.

Equal Opportunities Awareness

All employees will be informed of the Company's expected standards of conduct in respect of equality of opportunity at the induction stage of employment. This will outline the need for equality in the workplace, the impact that discrimination may have on fellow employees and what the consequences of derogatory conduct or remarks may include.

Where necessary, the Company will take additional steps to ensure there is an appropriate awareness amongst employees of the effects discriminatory behaviour.

Harassment

Harassment is unwanted conduct of a sexual, racial or a disability nature directed towards an employee by a fellow employee (or group of employees) which is regarded as unwelcome and offensive by the recipient. Harassment may include:

- Unwanted physical contact, ranging from touching to serious assault.
- Unwelcome sexual advances, propositions, suggestions or pressure to participate in social activities outside work where it has been made clear that this is not welcome.

- Suggestions that sexual favours may further an employee's career, or that refusal may hinder it.
- Conduct which is intimidating, such as physical, verbal and non-verbal abuse. This includes the display of sexually explicit or racially offensive material, the use of sexually explicit or racially offensive humour, and comments of a discriminatory nature, whether directed specifically at any particular individual or not.

It is the impact of this behaviour which is relevant, not the motive or intended aim.

Employees Responsibilities

As an employee, you have the right to work in an environment which is free from any form of harassment. All employees have a responsibility to help ensure a working environment in which the dignity of employees is respected; employees must ensure their behaviour to colleagues, clients or and customers does not cause offence and could not in any way be considered to be harassment. The Company fully recognises your right to complain about harassment should it occur and recommends the following procedure:

Informal Complaint

Where you do not view the harassment as serious or where it is not repeated and you simply want the behaviour to stop, you should approach the alleged harasser directly, making it clear to the person(s) harassing you that the behaviour is offensive, is not welcome and that it should be stopped.

Where you find this difficult or embarrassing, you may request a member of the management team to approach the alleged harasser informally on your behalf.

Formal Complaint

The formal complaints procedure is appropriate if you view any harassment to which you have been subjected as serious, if you prefer this method or if the harassment continues after the informal procedure has been used. All formal complaints will be dealt with seriously, promptly and confidentially under the Company's Grievance Procedure.

Formal complaints should be made in accordance with the Company's Grievance Procedure. An investigation will be conducted to clarify and formally record the nature of the complaint and the events surrounding the complaint, and will include meetings with anyone who can assist with the investigation. During this time, every effort will be made to distance the associated parties from each other.

If You are Accused of Discrimination or Harassment

If you are accused of acting in a discriminatory manner towards a fellow employee or a job applicant, or if you are accused of harassment, you will be given a proper opportunity to rebut the allegation as part of the investigation, and provide an explanation of your actions.

Equal Opportunities Policy



If it is concluded that there was no discrimination or harassment, this will be the end of the matter. If it is concluded that a false claim has been maliciously made against you, the person or persons responsible may be subject to disciplinary action.

If it is concluded that you have acted in a discriminatory manner, or have harassed another employee, your manager will consider what action to take. This may range from counselling to formal disciplinary action, including dismissal in serious cases.

Management Responsibilities

Managers are the guardians of the equality of opportunity within their areas of responsibility. Equal Opportunities are part of the larger management responsibility of ensuring that the employment environment provides employees with motivation to do a good job. This will be impossible to achieve if individuals feel that they are being treated unfairly.

Where problems or complaints arise, managers must take these seriously and make sure they are investigated and that any necessary follow-up action is taken. This may include initiating disciplinary action against employees who have committed acts of discrimination or harassment.

Monitoring

Finally, remember that equality of opportunity is about an effective employment practice, and about creating an environment in which everybody can be assured that his or her contribution is valued. The Company will not tolerate harassment of any kind in the working environment and will take positive action to prevent its occurrence.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. The Company will monitor the effectiveness of its policies and will implement changes where these could improve equality of opportunity. The commitment applies to all the Company's employment policies and procedures, not just those specifically connected with equal opportunity.

Signature: *R Easton*

Date: 6th January 2016

Name: R Easton

Position: Joint Managing Director