

EQUALITY, INCLUSION AND DIVERSITY POLICY

The purpose of this policy is to ensure equality for all workers, job applicants and others affected by our activities and decisions, irrespective of ethnicity, colour, race, nationality or ethnic origin, mental or physical disabilities, age, marital or civil partnership status, actual or perceived sexual orientation, gender or gender re-assignment, pregnancy or maternity, religion or belief.

It is our policy to:

- (1) Respect the equal rights of all persons.
- (2) Comply with the Human Rights Act 1998, Equality Act 2010, Modern Slavery Act 2015 and other relevant acts and regulations and subsequent amendments, and to observe as far as possible the Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay, and Services, Public Functions and Associations.
- (3) Treat all persons fairly, openly and honestly with respect and dignity.
- (4) Ensure that no person is victimised or subjected to harassment or discrimination on the grounds outlined above.
- (5) Promote equal opportunities and to ensure that the talent and skills of all employees are maximised.
- (6) Make recruitment, training and promotion opportunities as widely as possible, and ensure that selection criteria are made entirely related to the job, and that outcome decisions are made purely based on merit.
- (7) Make equal pay in employment. In order to achieve this, we will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.
- (8) Make reasonable adjustments to its standard working practices to overcome barriers caused by disability.
- (9) Investigate all allegations of victimisation, discrimination and harassment promptly and thoroughly. Where allegations are substantiated, disciplinary action shall be undertaken the results of which may include dismissal of the person(s) responsible.

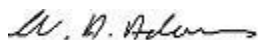
We seek to fulfil this commitment to equality through the application of the below procedures.

This Policy applies to all employees and to all applicants for employment.

We will circulate this equality, inclusion and diversity policy to all workers by including in induction, making available in employee accessible areas of the company server and displaying on the website. We will train our managers in equality, inclusion and diversity and the law on equality of opportunity, discrimination, harassment and victimisation. We will raise awareness of our workers on the need to deliver equality on site, ad to avoid actions that may be classed as harassment, intimidation or victimisation.

This policy shall be review as part of any change event, post-incident, on identification of better practice or as a minimum at least every three years.

As person with overall responsibility for this policy and its effective implementation I endorse this policy.



Will Adams, Managing Director

03 July 2018

PROCEDURES

1. Recruitment

- 1.1 All vacant posts within the Company will be advertised internally, whether or not they are also advertised externally. 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.
- 1.2 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.
- 1.3 When vacancies are advertised, both internally and externally, we will continue to ensure that such advertising, both in placement and content, is compatible with the Terms of this Policy.
- 1.4 Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, we will, as far as reasonably practicable:
 - (a) Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, age, religion or racial group.
 - (b) Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, age, religion or racial group, or which would exclude disabled job applicants.
 - (c) Avoid prescribing any requirements as to marital or civil partnership status.
- 1.5 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, age, religious or racial group, or from employees with a disability.
- 1.6 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.
- 1.7 With disabled job applicants, we will have regard to our duty to 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.

2. Employment of Family Member

- 2.1 The employment of members of an employee's immediate family is subject to the provisions set out below.
- 2.2 Family members, defined as parents, children, spouse, civil partner, siblings, grandparents and those same relationships engendered by in-laws, adoptions, civil partnerships, guardianships and stepfamilies, may be employees of the Company as long as their employment does not create an inappropriate work relationship. This applies whether the relationship exists at the time of employment or subsequent to employment.
- 2.3 An inappropriate work relationship results when family members are employed:
 - In the same workgroup.
 - In direct or indirect Supervisor / Subordinate relationship.
 - Where there is a strong possibility of interaction of job duties.
 - In a Department where control / audit over the work of that Department is the responsibility of an immediate family member working in another Department.
- 2.4 All employment decisions, job assignments, transfers and promotions are to be consistent with this Equality, inclusion and diversity Policy.

3. Training and Development

- 3.1. Equal consideration will be given to all employees for training opportunities, both to perform their job and to develop personally.
- 3.2. Employees will be appraised against relevant, objective criteria to measure performance and training needs.
- 3.3. Promotion prospects will be governed by individual merit, ability, achievement and development potential.
- 3.4. It is a condition of employment that employees attend appropriate induction/ training / educational courses.
- 3.5. We will train, develop and promote on the basis of merit and ability only.
- 3.6. At least once per year, a review of employee performance will be made by the line manager and recorded on an appraisal record.
- 3.7. Any training needs or other training issues arising in or from the appraisal shall be recorded on a Training Plan.
- 3.8. Increases in remuneration package are not automatic and will depend on the Company's business situation and industry outlook, as well as on your individual performance. It must also be recognised that should your overall remuneration package be increased, this may be through enhanced benefits rather than or as well as an increase in salary.
- 3.9. We will train all Directors and Managers in the Company's Policy on Equality and help them identify discriminatory acts, practices or acts of harassment or bullying. Managers will be responsible for ensuring they actively promote equal opportunities within the Departments for which they are responsible.
- 3.10. We will also provide training to all employees to help them understand their rights and responsibilities, including awareness of the rights of others, in relation to dignity at work and what they can do to create a work environment that is free from bullying and harassment.

4. Employment Verification

- 4.1. 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.

5. Victimisation, Harassment and Bullying

- 5.1. The company will not tolerate any form of victimisation, harassment or bullying. Victimisation, harassment and bullying includes but is not limited to being forced to undertake work that the individual does not feel capable of doing, physical attack, excessive verbal attack, demeaning remarks meant to take offence, provision of different working conditions with the intention of disadvantage the individual, unreasonable out-of-hours contact beyond contractual requirements, wolf-whistling or cat calling, or other similar activity.
- 5.2. Should any individual, be they be employed by the company or a third party eg client, member of the public, make a claim of bullying or harassment then this shall be dealt with as per 7. Discrimination Grievances below.

6. Monitoring

- 6.1. The implementation of the Equality, inclusion and diversity Policy shall be reviewed periodically and progress in achieving its objectives reviewed. Where barriers to equality are identified, any necessary changes will be made to this Policy.

7. Discrimination Grievances

- 7.1. If an employee or other person believes that they have been subjected to direct or indirect discrimination, harassment or bullying they should invoke the Company's Grievance Procedure.
- 7.2. The person raising the grievance may, if preferred, approach the Directors, Managers or HSQE Advisor directly

rather than the immediate Manager.

- 7.3. The incident shall be investigated by an independent party nominated by the Director. Suitable evidence including witness statements, texts, emails etc shall be gathered and evaluated.
- 7.4. Where upheld the individual(s) causing the incident shall be subject to disciplinary action.
- 7.5. In all cases, we will treat the matter as strictly confidential.

END