

3. Diversity and Equal Opportunities Policy

Policy

It is the policy of the Group to make all employment decisions including policies based upon the applicant's ability, experience and qualifications without regard to age, sex, race, colour, nationality, national origin, sexual orientation, ethnic origin, any gender reassignment, religion or belief, disability or marital status. The Group values the benefits a diverse workforce can bring. Our employees shall not be disadvantaged by any policies on pregnancy or trade union membership grounds or the fact that they are a part-time or fixed-term employee, and applicants for employment conditions of service which cannot be justified as necessary for operational purposes. This applies also to treatment by workers of the Group's clients and supplier.

Individuals will be selected, promoted and employment decisions will be taken on the basis of their relevant aptitudes, skills and abilities. Employees will be encouraged to take advantage of suitable opportunities for training and advancement, where appropriate.

The Group is committed to the terms of the Code of Practice on Employment for the elimination of racial discrimination, the promotion of equality of opportunity in employment, the elimination of disability discrimination and to a continuing programme of action to make this policy fully effective. All employees have a duty to act in accordance with this policy and therefore to treat all colleagues with dignity at all times, and not to discriminate against or harass other members of staff whether junior or senior to them. Any behaviour which undermines this purpose will not be tolerated and will be dealt with under the Company's Disciplinary and Dismissal Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

Further, the Group will monitor the composition of the workforce and may introduce positive action if it appears that this policy is not fully effective.

The Group embraces diversity as a practical contribution to its business success. Equality and diversity have a crucial role on two levels. At an interpersonal level; in determining how people relate to each other and build relationships in the work place and at the managerial level; enabling managers to encourage diversity and the positive role that this plays in the success of the Group as a business and employer.

Procedure

The Group is committed to its Diversity and Equal Opportunities Policy and all employees are required to co-operate with its efforts to ensure that the policy is implemented in full.

Monitoring

All employees and job applicants will be asked to complete a form denoting their nationality, sex, race, age and ethnic origin and any disabilities. This form will not

bear the name of the individual and will be detached from the contract of employment and application. The Group guarantees that this information will be used only for the purpose of complying with its legal obligations and of monitoring the effectiveness of its Diversity and Equal Opportunities Policy.

Positive Action

The composition of the workforce and of job applicants will be monitored on a regular basis. Should inequalities become apparent, positive action may be taken to redress the imbalance, including such measures as:

- advertising jobs in ethnic or female interest publications in addition to those publications more commonly used, as appropriate;
- introducing assertiveness training;
- encouraging under-represented groups to apply for suitable training;

in order to encourage job applications from under-represented groups.

Discipline

Any employee who discriminates against or harasses:

- (a) any other employee on any grounds including without limitation age, sex, race, colour, nationality, national origin, sexual orientation, ethnic origin, disability, religion or belief, marital status or gender reassignment (or because they are perceived to have any one of these);
- (b) any other employee merely because of anyone with whom they associate has one or more of the following characteristics without limitation: age, sex, race, colour, nationality, national origin, sexual orientation, ethnic origin, disability, religion or belief, marital status or gender reassignment and the treatment is because of such a characteristic;

will be subject to the Group's Disciplinary and Dismissal Procedure.

Such behavior may be deemed to constitute gross misconduct and may result in summary dismissal.

Grievances

Any employee or job applicant who believes he or she has received less favourable treatment on the grounds of age, sex, race, colour, nationality, national origin, sexual orientation, ethnic origin, disability, religion or belief or marital status is asked to bring their concerns to the attention of the person responsible and ask them to stop the offensive behaviour. If it would be inappropriate to raise it with the person concerned, or the problem is not resolved by being raised with them, employees should make a complaint under the Group's Grievance Procedure.