

THOMAS ARMSTRONG (HOLDINGS) LIMITED GROUP OF COMPANIES

EQUAL OPPORTUNITIES & DIGNITY AT WORK POLICY

1. Policy Statement

The Company is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are known as the “protected characteristics”.

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are known as the “anti-harassment protected characteristics”. All employees are responsible for conducting themselves in accordance with this policy. The Company will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers.

Employees have a duty to co-operate with the Company to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company’s disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

You should draw the attention of your supervisor to suspected discriminatory acts or practices or suspected cases of harassment or bullying. You must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company’s disciplinary procedure. You should support colleagues who suffer such treatment and are making a complaint.

The Company will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.

2. Definitions

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment

Indirect discrimination occurs when it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when applied to an applicant or employee a Provision Criteria or Practice (PCP) which is discriminatory in relation to a 'protected characteristic'.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment

3. Recruitment and Selection

The recruitment process is designed to ensure the most appropriate person is selected by an objective assessment of relevant experience, ability and qualifications in consideration of the job description.. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. The Company will ensure that advertisements will not be confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic. The Company will also avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled

The Company is committed to applying its Equal Opportunities Policy Statement at all stages of recruitment and selection.

4 Training, Development and Promotion

The Company encourages the development of professional skills which are of the benefit to both the various Companies as well as the individual members of staff. The Company supports the training and development of employees to enable them to perform their duties effectively.

All employees will have access to training programmes, development of skills and promotion opportunity without exclusion.

5 Monitoring and Review

The operation of this Policy will be reviewed by the Personnel Manager on an annual basis in order to develop action programmes wherever necessary to overcome inequalities and to assess whether equal opportunity and dignity at work are being achieved.

The Thomas Armstrong (Holdings) Limited group of companies wish it be known as an Equal Opportunity Employer to the community as a whole and by its customers and clients and other Employers.

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M J Bailiff

Group Personnel Manager

7 July 2011