

EQUAL OPPORTUNITIES AND DIVERSITY POLICY

The Company is committed to providing a working environment in which employees are able to realise their full potential and to contribute to its business success irrespective of their gender, race, disability, sexual orientation, marital status, part time status, age, religion or belief. The Company values the differences that a diverse workforce brings. This is a key employment value to which all employees are expected to give their support.

The Company is committed to identifying and eliminating unlawful discriminatory practices, procedures and attitudes throughout the Company. The Company expects employees to support this commitment and to assist in its realisation in all possible ways.

Specifically, the Company aims to ensure that no employee or candidate is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or belief. This commitment applies to all aspects of employment, including:

- 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 and facilities;
- grievance handling and the application of disciplinary procedures; and
- selection for redundancy.

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

Harassment

Harassment is physical, verbal or non verbal behaviour which is unwanted and personally offensive to the recipient, and which causes the recipient to feel threatened, humiliated, intimidated, patronised, denigrated, bullied, distressed or harassed.

The way in which Complaints of Unlawful Discrimination and Harassment will be handled

Discrimination and harassment are often complex matters, and there is no single way of dealing with every suspected or alleged instance. In some cases employees may be able to deal satisfactorily with an issue by raising it with their immediate manager.

If an employee wishes to make a formal complaint he or she should use the Company's Grievance Procedure which is set out in the Employee Handbook.

The Company will treat seriously all allegations of unlawful discrimination or harassment.

If an Employee is Accused of Unlawful Discrimination or Harassment

If an employee is accused of unlawful discrimination or harassment, the Company will investigate the matter fully.

In the course of the investigation the employee will be given the opportunity to respond to the allegation and provide an explanation of his or her actions.

If the Company concludes that no unlawful discrimination or harassment has occurred, this will be the end of the matter.

If the Company concludes that the claim is false or malicious the complainant may be subject to disciplinary action.

If on the other hand the Company concludes that the employee's actions amount to unlawful discrimination or harassment he or she may be subject to disciplinary action, up to and including summary dismissal for gross misconduct.

Monitoring

The Company will not tolerate unlawful discrimination or harassment of any kind in the working environment and will take positive action to prevent its occurrence.

In this connection the Company will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all the Company's employment policies and procedures, not just those specifically concerned with equal opportunities and diversity.

Employment and Training

As an employer, the Company will treat all employees and job candidates equally and fairly and not discriminate unjustifiably against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment-related activities.

Recruitment and Selection

The Company recognises the benefits of having a diverse workforce and will take steps to ensure that:

- it endeavours to recruit from the widest pool of qualified candidates possible;
- employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- where appropriate, positive action measures are taken to attract applications from all sections of society and especially from those groups which are underrepresented in the workforce;
- selection criteria and processes do not discriminate unjustifiably on the grounds of gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or belief, other than in those instances where the Company is exercising lawfully permitted positive action;
- wherever appropriate and necessary, lawful exemptions (Genuine Occupational Requirements) will be used to recruit suitable employees to meet the special needs of particular groups; and
- all recruitment agencies acting for the Company are aware of its requirement not to discriminate and to act accordingly.

Recruitment of Ex-offenders

- As an organisation using the Criminal Records Bureau (CRB) / Disclosure Scotland service to assess candidates' suitability for positions of trust, the Company complies fully with the CRB / Disclosure Scotland Code of Practice and undertakes to treat all candidates fairly. The Company undertakes not to discriminate unlawfully against any candidate who is required to provide

information through this process. The information provided is known as a Disclosure.

- The Company's policy on the recruitment of ex-offenders will be made available to all candidates at the outset of the recruitment process.
- The Company actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcomes applications from a wide range of candidates, including those with criminal records. The Company selects all candidates for interview on the basis of their skills, qualifications and experience.
- A Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where such a check is required, all application forms, job advertisement and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position.
- Where a Disclosure is part of the recruitment process, the Company encourages all candidates called for interview to provide details of any criminal record at an early stage in the application process. The Company requests that this information is sent under separate, confidential cover to a designated person within the Company. The Company guarantees that only those who need to see it as part of the recruitment process will see this information.
- Unless the nature of the position is such that the Company may ask questions about an individual's entire criminal record, the Company will only ask about "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974.
- The Company will ensure that all individuals involved in the recruitment process receive appropriate guidance and training in the legislation relating to the employment of ex-offenders, e.g., the Rehabilitation of Offenders Act 1974.
- The Company will ensure that it discusses with the candidate the relevance of any offence to the job in question. A candidate's failure to reveal information directly relevant to the job could result in withdrawal of an offer of employment.
- The Company will ensure that it makes any candidate who is subject to Disclosure aware of the CRB / Disclosure Scotland Code of Practice and will provide a copy of the Code on request.

- The Company undertakes to discuss any matter revealed in the Disclosure with the candidate before withdrawing the offer of employment.

- Having a criminal record will not necessarily prevent the candidate from working with the Company. Whether or not it does will depend on the nature of the position and the circumstances and background of the offences.

Conditions of Service

The Company will treat all employees equally and create a working environment which is free from discrimination and harassment and which respects, where appropriate, the diverse backgrounds and beliefs of employees.

Terms and conditions of service for employees will comply with U.K. equal opportunities legislation.

The provision of benefits such as working hours, maternity and other leave arrangements, performance appraisal systems, dress code, bonus schemes and any other conditions of employment will not discriminate unlawfully against any employee on the grounds of their gender, race (including colour, nationality or ethnic origin), disability, sexual orientation, marital status, part time status, age, religion or belief.

Where appropriate and necessary, the Company will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of employees which arise from their gender, ethnic or cultural background, nationality, responsibilities as parents or carers, disability, sexual orientation, marital status, part time status, age, religion or belief.

Promotion and Career Development

Promotion within the Company will be made without reference to any of the forbidden grounds and will be based solely on merit.

The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unjustifiably discriminatory impact on any particular group.

Whilst positive action measures may be taken in accordance with the relevant equal opportunities legislation to encourage underrepresented groups to apply

for promotion opportunities, recruitment or promotion to all jobs will be based solely on merit.

All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. However, the Company will take appropriate positive action measures (as permitted by the equal opportunities legislation) to provide special training and support for groups which are underrepresented in the workforce and encourage them to take up training and career development opportunities.

Promoting Equality and Diversity

This Company is committed to promoting equality and diversity in the Company as well as in those areas in which it has influence.

Employees will be trained on this Equal Opportunities and Diversity Policy and will be provided with equality and diversity training appropriate to their needs responsibilities.

All those who act on the Company's behalf will be trained on the Company's Equal Opportunities and Diversity Policy and will be expected to pay due regard to it when conducting business on the Company's behalf.

In all its dealings, including those with clients, customers, suppliers, contractors recruitment agencies and the public, the Company will seek to promote the principles of equality and diversity.

The Company will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities.

Implementing the Policy

Responsibility

Ultimate responsibility for implementing the policy rests with the directors of the Company. The Company will appoint a senior person within it to be responsible for the operation of the policy.

All employees of the Company are expected to pay due regard to the provisions of the Equal Opportunities and Diversity Policy and are responsible for ensuring compliance with it when undertaking their jobs or representing the Company.

Acts of discrimination or harassment by employees of the Company will result in disciplinary action. Failure to comply with this policy will be treated in a similar fashion.

Complaints of Discrimination

The Company will treat seriously, and will take action where appropriate concerning, all complaints of discrimination or harassment on any of the forbidden grounds made by employees, clients, customers, suppliers, contractors or other third parties.

All complaints will be investigated in accordance with the Company's grievance or complaints procedure, as appropriate, and the complainant will be informed of the outcome.