

EQUAL OPPORTUNITIES 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. This is a key employment value to which all employees are expected to give their support.

In order to create conditions in which this goal can be realised, 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.

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.

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.