NEWLINCS Development Ltd Grimsby Operations Limited

The Equal Opportunity Policy is written by, reflects the intentions of and has the full support of the Management Team – the policy sets the clear direction that the organisation will take to ensure the standards we have attained to date are sustained and built upon.

Equal Opportunity Policy Statement

Newlincs Development Ltd and Grimsby Operations Ltd (the company) is committed to equal opportunities in employment. Its aim is to develop good employment policies and practices, which ensure equal opportunities and fair treatment for all employees and prospective employees.

The company will seek to ensure that no unlawful or unfair discrimination takes place on the basis of conditions not relevant to the performance of the job, such as gender, marital status, sexual orientation, race, colour, ethnic origin, nationality, religion, age or disability.

All employees (whether full or part-time, permanent or temporary) will be provided with appropriate information and guidance, by their manager

All employees within the company have an individual responsibility to apply this Policy in practice and to conduct themselves in a manner consistent with the Policy, minimum standards and the relevant legislation.

- > treat others with respect, irrespective of sex, marital status, sexual orientation, race, colour, ethnic origin, nationality, religion, age or disability;
- treat each other without prejudice, bias or discrimination;
- ensure that they do not subject others to harassment, victimisation or bullying at work.

Sharon Hunt

Operations Director

January 2020

The Company will undertake a pro-active approach the allocations of duties and the particular 'arrangements' and minimum standard which will be made are set out in the Equal Opportunity Policy document.

EQUAL OPPORTUNITY POLICY

OPERATIONS DIRECTOR

The Operations Director will:

- > ensure that the Policy is communicated throughout the Company;
- establish and regularly review equal opportunity policies and practices in areas such as: recruitment, selection, training, development, succession planning, performance review, terms and conditions, and other benefits, and issue appropriate policy, minimum standards and information in these areas;
- > ensure functional advice, direction and, where appropriate, training, is made available to managers and supervisors on equal opportunities issues.

MANAGERS AND SUPERVISORS

Managers and supervisors have an individual responsibility to communicate, implement and consistently apply this Policy within their areas of responsibility. They will:

- > ensure compliance with this Policy, minimum standards and relevant legislation;
- > ensure their managers and other employees receive appropriate training to support this Policy and minimum standards;
- ensure that all employees (whether full or part-time, permanent or temporary) within their areas of responsibility, understand their personal responsibilities under the Policy and the relevant legislation, and their responsibilities and rights regarding harassment at work;
- ensure that all contractors acting on behalf of, or representing, the company are provided with appropriate information and guidance on this Equal Opportunity Policy and minimum standards and are informed of their responsibility to conduct themselves in a manner consistent with this Policy;
- assist the Operations Director to regularly review and audit the effectiveness of this Policy and provide relevant statistical monitoring data and information that may be required to address Company or statutory requirements.

EMPLOYEES

All employees within the company (whether full or part-time, permanent or temporary) have an individual responsibility to apply this Policy in practice and to conduct themselves in a manner consistent with the Policy, minimum standards and the relevant legislation. In their dealings with fellow employees, prospective employees, customers, members of the public, contractors and representatives of other companies with whom they come into contact whilst working for the company, they should:

- > treat others with respect, irrespective of sex, marital status, sexual orientation, race, colour, ethnic origin, nationality, religion, age or disability;
- treat each other without prejudice, bias or discrimination;
- > ensure that they do not subject others to harassment, victimisation or bullying at work.

LEGAL REQUIREMENTS

This Equal Opportunity Policy has been developed within the framework of UK and EC employment legislation. Failure to comply with the Policy may constitute a breach of legislation and expose the Company, and in some cases individual employees, to the possibility of legal action being taken against them.

EQUAL OPPORTUNITY POLICY MINIMUM STANDARDS

COMMUNICATION OF POLICY

- All employees (whether full or part-time, permanent or temporary) must be provided with appropriate information and guidance, by their manager, the Equal Opportunity Policy and Minimum Standards, and their individual responsibilities and rights under the Policy.
- All contractors acting on behalf of, or representing, company must be provided with appropriate information and guidance on the Company's Equal Opportunity Policy and minimum standards and their responsibility to conduct themselves in a manner consistent with this Policy.

RECRUITMENT AND SELECTION

- Recruitment and selection criteria must be clear and based upon an objective analysis and definition of the abilities, skills, knowledge and experience required for the job, not upon conditions unrelated to the job requirements, such as gender, marital status, sexual orientation, colour, race, ethnic origin, age, disability, etc.
- All internal and external job advertisements should state that "the company is committed to Equal Opportunities".
- All company employees, including those who work for wholly owned subsidiaries, must have an opportunity to see internally advertised vacancies. Internal vacancy details must be circulated effectively to <u>all</u> units within the Company, including subsidiaries.
- ➤ In exceptional circumstances, where recruitment is carried out through restricted circulation of vacancy details, or as a result of nominations for the purpose of staff development, approval should be obtained from the appropriate Director.

- Recruitment must not be based solely on "word of mouth" or personal contacts/recommendations.
- All external recruitment agencies and recruitment/selection consultants acting on behalf of the company must be informed of, and required to comply with, the principles and standards of the Equal Opportunity Policy.
- > Interview questions must be based solely upon the job requirements and the specified selection criteria.
- > Selection and assessment tools and mechanisms, including tests, questionnaires, written and practical exercises, etc, must be job related and linked closely to the selection criteria.
- Where tests and questionnaires are used, trained licensed users must apply, administer and interpret them.
- > Notes relating to each candidate's performance must be taken during selection interviews.
- > All selection decisions must be based on objective, non-discriminatory job related criteria and reasons for rejection/acceptance clearly recorded.

TRAINING AND DEVELOPMENT

- > Training and development should be provided on the basis of objective, nondiscriminatory job and work related criteria.
- Where there is a need to create or provide development opportunities for the purpose of succession planning, clear criteria must be produced, related to job or role requirements, which must not result in bias on the basis of gender, marital status, sexual orientation, colour, race, ethnic origin, age, disability, etc.

Nomination of individuals for specific development opportunities, in conjunction with succession planning, must be based on clear evidence of past and current performance, or clear demonstration of identified potential to fulfil other roles.

PERFORMANCE MANAGEMENT

- > In conducting performance reviews, clear criteria and objectives must be determined in an objective, consistent and non-discriminatory manner.
- > Training and development plans and actions resulting from the performance review process must be determined objectively, consistently and in a non-discriminatory manner.

PAY AND BENEFITS

> Pay, benefits and other remuneration must be based upon objective, non-discriminatory criteria (which ensures consistency of treatment), not upon conditions unrelated to the job requirements, such as gender, marital status, sexual orientation, colour, race, ethnic origin, age, disability, etc.

HARASSMENT AND BULLYING

- All employees (whether full or part-time, permanent or temporary) must be provided with appropriate information and guidance, by their manager, of their individual responsibilities and rights regarding harassment and bullying at work and company's commitment to preventing and eliminating harassment and bullying.
- > Harassment procedures and arrangements must be in place for dealing effectively with complaints, allegations or instances of harassment and bullying.
- > Appropriate counselling must be made available for the victims of harassment and bullying, and also, where required, for those alleged to have harassed or bullied others.

- All complaints, allegations and reported instances of harassment and bullying must be taken seriously and, where necessary, investigated thoroughly, promptly, and in a confidential manner by the appropriate manager.
- Proven cases of harassment and bullying must be treated as misconduct, and in such cases, the penalties under the Company's disciplinary procedure must be applied.
- > Individuals making complaints must be informed of the results of the investigations and the actions taken.

MATERNITY AND CHILDCARE

- Pregnancy, or the possibility of future pregnancy, must not exclude female employees from selection, promotion, training and development opportunities.
- Pregnancy, or the possibility of future pregnancy, must not result in dismissal or severance.
- Flexible working measures, such as job sharing and reduced hours must be made available to employees (taking account of business and individual needs), on a consistent basis, regardless of gender, marital status, sexual orientation, colour, race, ethnic origin, age, disability, etc.

PERSONAL BEHAVIOUR

All employees (whether full or part-time, permanent or temporary) must ensure that they do not subject others, including fellow employees, members of the public, contractors, and representatives of other companies with whom they come into contact whilst working for the company, to unlawful discrimination, harassment, bullying or victimisation