



## Equal Opportunities Policy

This policy deals with a number of aspects of the management of equal opportunities and may be used to supplement any contractual terms relating to equal opportunities.

## Overview

The Company is committed to being an equal opportunities employer and to maintaining a working environment free from discrimination, victimisation, harassment and bullying. In all aspects of employment the Company's aim is to ensure that all applicants, employees, workers, and visitors (including customers and suppliers) receive equal treatment irrespective of their sex, marital or civil partnership status, sexual orientation, gender reassignment, race, colour, ethnic or national origins, religion or belief, disability or age ("the Protected Grounds"). Fixed-term and part-time workers are also protected from being treated less favourably than their permanent full-time counterparts and we are committed to parity of treatment. This policy has been approved by the Company's management who vigorously endorse the principles of non-discrimination.

Unlawful discrimination, victimisation, harassment and bullying will not be tolerated by the Company and those responsible for any such action or any other breach of this policy may be subject to disciplinary proceedings under the Company's disciplinary procedure (up to and including summary dismissal) and may also be personally liable for their unlawful conduct. In some cases this may include criminal liability.

This policy does not have contractual effect and is given by way of guidance only. The policy is not exhaustive. The Company reserves the right to amend or replace this policy at any time. The policy applies to all persons working for us, whether as employee, self-employed or casual worker, full or part time, paid or unpaid or on any other basis whatsoever.

## Policy

The laws prohibiting discrimination in the workplace affect all our employment decisions and we do not discriminate against any person working for us or involved with our business (whether as customer, supplier or otherwise) on any of the Protected Grounds nor do we allow any member of staff to discriminate on any of the Protected Grounds.

We aim to provide managers with equal opportunities training. This includes but is not limited to decisions relating to job advertisements, recruitment and selection, transfers and promotions, training and development, salary, health and safety, benefits, disciplinary and grievance issues, termination of employment and severance terms.

We seek to monitor our employment practices regularly, whether formally or informally, to identify and eliminate any potentially discriminatory practices. All members of staff working for us are expected to comply with the principles of non-discrimination set out in this policy and in law. As a general rule, all workers should treat each other and those they come into contact with at work with equal respect. You are responsible not only for your own actions but to ensure that the actions of others do not breach the spirit and intent of this policy and the anti-discrimination legislation. Any discriminatory act should be reported immediately to the HR department and failure to do so may render you liable to disciplinary action.

There are two broad forms of discrimination under UK legislation: direct and indirect discrimination. Direct discrimination generally constitutes less favourable treatment on the Protected Grounds. Indirect discrimination generally occurs where a provision, criterion or practice, which may appear neutral and to apply equally to all, in fact puts a certain group of workers at a disadvantage in comparison to other workers.

It is also possible to discriminate against another because of a third party's Protected Ground (associative discrimination) and on the ground of perception (for example, the perceived sexual orientation of another). Discrimination can still take place even after employment has ended.

Discrimination may also take place as a result of victimisation, harassment or bullying. You are referred to the Company's Harassment and Bullying Policy. All policies can be found in the Staff Policy booklet, a copy of which is located in the Sales and Administration office in all depots. If necessary, you can also request a copy from Human Resources

## Disability

Disabled workers enjoy special protection in law, including an employer's duty to make reasonable adjustments to their job where appropriate. If you consider that you may be disabled within the meaning of the disability provisions of the UK equality legislation, you should notify the HR Department. The Company will discuss with you whether you are able to fulfil your proposed duties and whether there are any adjustments that could reasonably be made to your job or working environment to enable you to carry out your proposed duties effectively. The Company may also ask a medical adviser appointed by it to advise on these matters and on the impact of the physical features of our premises.

Applicants for a job will not be asked questions about their health before a job offer is made to them other than in the following circumstances:

- for the purposes of positive action;
- to assess whether reasonable adjustments need to be made or whether the applicant is able to attend an assessment; or
- to assess whether an applicant is able (with any reasonable adjustments) to carry out an intrinsic part of the job.

## Religion and other beliefs

Where your religious or other beliefs impact on your job or your ability to carry out your job in a particular way, you should discuss this with the HR department which will, where appropriate, ascertain whether your concerns can be accommodated.

## Childcare

You should discuss with the HR department any concerns that you may have about balancing your child-caring responsibilities with your job. The HR department may refer you to other appropriate policies and guidelines. Job applicants will not be asked questions relating to their past, future or potential pregnancy or their childcare arrangements.

## Harassment and bullying

You are referred to the Company's Harassment and Bullying Policy which sets out separate guidelines for dealing with cases of and harassment and bullying.

## Complaints procedure

This procedure contains an informal and formal route and applies to complaints relating to discrimination or victimisation on the Protected Grounds. If you believe that any such form of discrimination or victimisation is taking place, you must follow this complaints procedure. The route you choose may depend on the seriousness of your complaint and how you would like the matter to be dealt with. Please note that a separate procedure exists for cases of bullying and harassment and you are referred to the Company's Harassment and Bullying Policy.

It is in your interests to present any complaint promptly, to enable action to take place as soon as possible. You will be asked to substantiate the complaint with any evidence or examples you have. Any complaint made under this procedure will be handled by the Company sensitively, discreetly and, where possible, confidentially.

## Informal procedure

If you believe that you are suffering discrimination, victimisation, harassment or bullying, you should, if possible, attempt to resolve the issue with the person whom you believe is responsible for such treatment. You may inform them, in writing or orally, that their conduct is unacceptable and must stop. You are advised to keep a written record of the events, dates and any relevant documentation from the outset.

If you feel you cannot raise the matter directly with the person concerned, for any reason, you are encouraged to contact your line manager, who will discuss the matter with you. If your line manager is directly involved or you feel uncomfortable discussing this matter with them for whatever reason, you may prefer to approach the HR Department on an informal basis.

Depending on the seriousness and the nature of the complaint, the Company may take disciplinary action in relation to the individual(s) responsible for the treatment, even if you follow only the informal procedure.

## Formal procedure

If you wish to pursue the matter further, or if the Company decides to pursue the matter further, you will be asked to make a formal complaint under the Company's grievance procedure.

Even if you decide not to take the matter further, the Company may have a duty to other employees to investigate the matter fully.

Where a complaint has been made, the Company will initiate an investigation, where appropriate, as soon as practicable, to determine whether or not disciplinary action should be taken under the Company's disciplinary procedure.

If your complaint is well-founded, disciplinary action may be taken against the individual(s) accused of discrimination, victimisation, harassment or bullying (up to and including summary dismissal).

If your complaint is not well-founded, the Company will advise you accordingly. If you have acted in good faith and with good reason, the fact that you have brought a complaint will not affect your position within the Company. If, however, your complaint has been made in bad faith, you may be subject to the Company's disciplinary procedure (up to and including summary dismissal).

The HR Department will keep a record of your complaint, the investigation, the conclusion and any subsequent action taken.

## Appeals

If you are dissatisfied with the outcome of your complaint raised under this policy, or with the way in which it was handled, you may present an appeal in accordance with the Company's grievance policy.

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