



# I EQUAL OPPORTUNITIES AND DIGNITY AT WORK POLICY

## A. INTRODUCTION

1. Anpario plc is an Equal Opportunity Employer. This means that the Company's established policy is to ensure that no unlawful discrimination occurs, either directly or indirectly, against any person associated with any aspect of their treatment or employment including: recruitment and selection, promotion, transfer opportunities for training, pay and benefits, other terms of employment, grievance handling, discipline, selection for redundancy and dismissal.
2. Anpario plc 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, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity. Within the Equality Act and in this policy these are known as 'protected characteristics'.
3. Anpario plc appreciates that, throughout the organisation, treating staff fairly and recognising individual talents, needs and contributions is not only the right thing to achieve, but also makes sound business sense. We recognise that having a mixed workforce confers benefits which include flexibility and a wider pool of skills and experience upon which to draw. What matters is the individual's ability to do their job. We firmly believe that a diverse workforce constitutes a major business asset.
4. Anpario plc will do all in its power by means of publicising issues, education and training of employees, supervisors and managers; counselling and, if necessary, by the implementation of disciplinary sanctions to prevent any incidences of unlawful direct or indirect discrimination, harassment, bullying, intimidation or victimisation associated with any protected characteristics.
5. Training of Anpario plc employees, supervisors and managers in relevant aspects of Diversity, Equal Opportunities and Dignity at Work will include that topic plus Anpario plc's related policies and procedures. Workplace behavior training materials may also be accessed via the HR share drive.
6. All employees are urged to be vigilant and to report any instances of observed or suspected unlawful discrimination incidents or practices within or associated with the workplace, which apply to themselves or anyone else, by using the Company's *Grievance Policy (DG II)* or *Dealing with Claims of Unlawful Discrimination Policy (DG III)*. These documents are held within the *Anpario plc Policies and Procedures* which is available on the Company server or from HR.
7. The Company will not condone or tolerate any form of unlawful discrimination, harassment, bullying or intimidation, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers. The Company will also take appropriate action against any third parties who are concluded to have committed any such improper or unlawful acts against its employees.



## B. DEFINITIONS

1. **Direct discrimination**  
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 treatment will still amount to direct discrimination even if it is based on the protected characteristic of another person with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.
2. **Indirect discrimination**  
Indirect discrimination is treatment that may be equal in the sense that 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 there is applied to the job applicant or employee a provision, criterion or practice which is discriminatory in relation to a protected characteristic of the job applicant or employee and it cannot be shown by the Company to be a proportionate means of achieving a legitimate aim.
3. **Bullying**  
Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting him/her up to fail or making threats or comments about someone's job security without good reason.
4. **Harassment**  
An employee or third party (e.g. a customer or supplier) harasses another employee if they engage in unwanted conduct related to an anti-harassment protected characteristic (sex, age, disability, gender reassignment, race, religion or belief or sexual orientation) or unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that employee. In some cases, behaviour (such as banter or jokes) will constitute harassment if it continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.
5. **Disability**  
Under the terms of the Equality Act, a person is defined as being disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.
6. **Victimisation**  
Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing



so. If an employee maliciously makes or supports an untrue complaint then this will be treated as gross misconduct.

### C. EMPLOYEE RESPONSIBILITIES

1. 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 any instances of unlawful discrimination, harassment, bullying or intimidation. Action will be taken under the Company's disciplinary procedure against any employee who is suspected of having committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this *Equal Opportunities and Dignity at Work Policy (BC I)* will be treated as potential gross misconduct and could render the employee liable to summary dismissal.
2. Listed within the Anpario plc *Disciplinary Policy (DG I)* as an example of serious misconduct which will be regarded as an act of gross misconduct is "Unlawful discrimination against any individual or any act of harassment, bullying or intimidation."
3. Anpario plc has adopted and will enforce the following disciplinary rule:

"Age, disability, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity are defined within the Equality Act as 'protected characteristics'.

Any employee concluded to have been guilty in or related to the workplace of any act of unlawful discrimination, harassment, bullying or victimisation towards anyone due to or associated with a protected characteristic is liable to serious disciplinary action which could involve dismissal. Employees must be aware of and comply with Anpario's published *Dealing with Claims of Unlawful Discrimination Policy (DG III)*.

4. 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.
5. Employees should draw the attention of their line manager to any suspected discriminatory acts or practices or suspected cases of harassment or bullying. Employees must not victimise or retaliate against an employee who has made allegations or complaints of unlawful discrimination, harassment or bullying or who has provided information about such behaviour. Such behaviour will be treated as potential gross misconduct in accordance with the Company's *Disciplinary Policy (DG I)*. Employees are urged to support any colleague who alleges that they have suffered such treatment and who is making a complaint using the *Grievance Policy (DG II)* or the *Dealing with Claims of Unlawful Discrimination Policy (DG III)*.