

Equal Opportunity Policy

POLICY STATEMENT

The Company is committed to the principle of equal opportunity in employment.

The Company is determined to make all reasonable efforts to prevent discrimination or other unfair treatment against any of its staff, relating to race, colour, nationality, ethnic or national origin, religion, belief, gender, sex, sexual orientation, marital status or civil partnership status, disability, part-time or fixed term status, age, or trade union membership or non-membership.

The Company's procedures for recruitment, selection, remuneration, training, development and promotion, are designed to ensure that no job applicant or employee receives less favourable treatment on these grounds.

The Company will ensure that individuals are selected, promoted and treated on the basis of their relevant aptitudes, experience, skills and abilities.

The Company Management at all levels has the primary responsibility for the successful achievement of these objectives:

- By not discriminating in the course of employment against job applicants, employees, customers, suppliers, or members of the public with whom contact is made;
- By not inducing or attempting to induce others to practice unlawful discrimination;
- By bringing to the attention of employees that they will be subject to action under the Disciplinary and Dismissal Procedure for discrimination of any kind.

These objectives will be regularly reviewed and overall responsibility for their achievement rests with the Group Managing Director or nominee.

RECRUITMENT

All job applications will be processed in the same way.

The Human Resources department, which is responsible for short-listing, interviewing and selecting candidates, will be clearly informed of the selection criteria, and will ensure their constant application.

Wherever possible, all applicants will be interviewed by at least two people.

All questions that are put to applicants will relate solely to the requirements of the job.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable



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hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about race, colour ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status, disability, children and/or domestic obligations.

PROMOTION, TRANSFER AND TRAINING

We will take such measures as may be necessary to ensure the proper training, supervision and instruction for all Department Heads to familiarise them with our policy on equal opportunities and in order to help them identify discriminatory acts or practices, and to ensure that they promote equal opportunity within the departments for which they are responsible.

All persons responsible for selecting new employees, employees for training, or for transfer to other jobs, will be instructed not to discriminate on any unlawful grounds.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a group of workers predominately of one race, religion, sex, sexual orientation or age group or a worker with a disability appears to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

TERMS OF EMPLOYMENT, BENEFITS, FACILITIES AND SERVICES

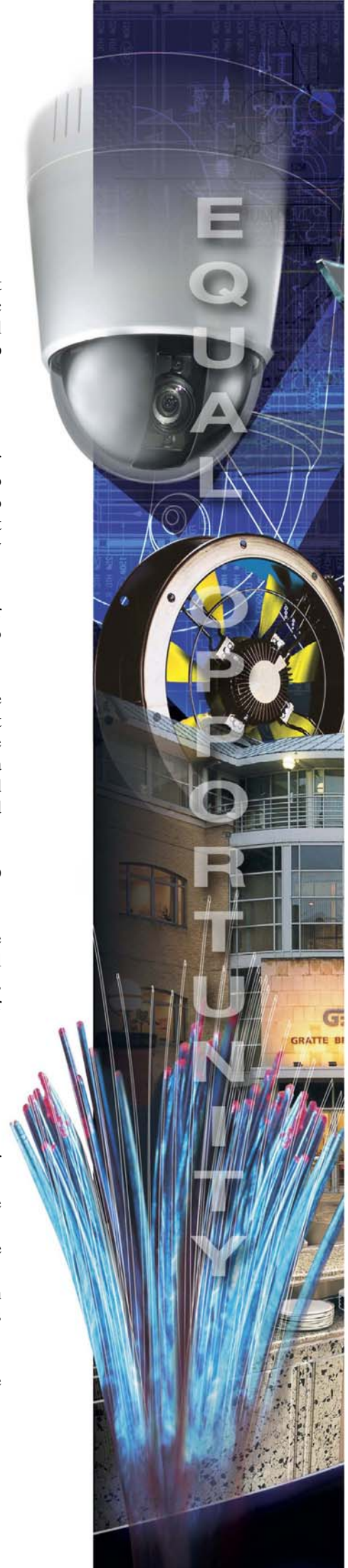
All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, marital or civil partnership status or disability.

IMPLEMENTATION

In order to implement this policy the Company will ensure that:

- The policy will be issued to all new employees at job offer stage;
- The policy will be communicated to all employees through the Company induction programme;
- The policy will be readily accessible by means of the Company website and intranet
- If an employee considers he/she is a victim of discrimination he/she should raise the issue through the Company's Grievance Procedure.

Employees have the responsibility to ensure they assist in the implementation of this policy:



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- By not discriminating in the course of their employment against fellow employees, customers, suppliers, or members of the public with whom contact is made;
- By not inducing or attempting to induce others to practice unlawful discrimination;
- By reporting any discriminatory action to their immediate Manager or Human Resources department.

MONITORING EQUAL OPPORTUNITY AT WORK

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunities at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

To make the policy work requires much more than this formal system. The policy will help to create the necessary conditions for success but it is for each employee to make his or her own contribution.

