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#### 1.0 Introduction

STREIF UK is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally.

STREIF UK will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications to meet the competence requirements as defined under the safety legislation, without regard to race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability. STREIF UK will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability. STREIF UK will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with STREIF UK.

Employees have a duty to co-operate with STREIF UK to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Action will be taken under STREIF UK's disciplinary procedure against any employee who is found to have committed an act of improper, gratuitous or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, STREIF UK for any act of unlawful discrimination.

Employees should draw the attention of their manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with STREIF UK's disciplinary procedure.

#### 2.0 Recruitment, advertising and selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. STREIF UK is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all **suitably qualified and experienced** people. When advertising job vacancies, in order to attract applications from all sections of the community, STREIF UK will, as far as reasonably practicable:

- Ensure advertisements are not confined to those publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, religion or racial group.
- Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, religion or racial group or which would fully exclude disabled job applicants.
- Avoid prescribing any requirements as to marital status.
- Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation,

















• Ensure that the setting of age limits as a criterion of any specific job is justifiable.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, STREIF UK will have regard to its duty to make reasonable adjustments to work arrangements or to work premises in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

#### 3.0 Training and promotion

STREIF UK will brief all supervisors in STREIF UK's policy on equal opportunities and in helping them to identify discriminatory acts or practices or acts of harassment or bullying. Supervisors will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

STREIF UK will also provide training to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment free of bullying and harassment.

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.

#### 4.0 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, marital status, age or disability.

#### 5.0 Equal pay

STREIF UK is committed to equal pay in employment. It believes its male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, STREIF UK will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

#### 6.0 Harassment

It is against STREIF UK's policy for any employee, male or female, to sexually harass another employee or to harass him or her on the grounds of actual or perceived sexual orientation. It is also against STREIF UK's policy for any employee to harass another employee on the grounds of his or her race, colour, ethnic origin, nationality, national origin, religion or belief, age or disability. Harassment occurs where a person engages in unwanted conduct which has the purpose or effect of violating the other's dignity at work or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person.

















Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal or physical conduct of a sexual nature, subjection to obscene or other suggestive comments, and sexual jokes or pictures. Racial harassment includes, but is not limited to, engaging in unwelcome verbal or physical conduct of a racial nature, subjection to racist comments, and racist jokes or pictures. Harassment may comprise intentional bullying which is obvious or violent but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the complainant to decide for him or herself what they regard as offensive.

#### 7.0 Reporting complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. STREIF UK will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular sex, sexual orientation, religion or racial group or from employees who are disabled.

With cases of harassment, while STREIF UK encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, STREIF UK also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you wish to make a complaint of discrimination or harassment, you should follow the following steps:

- First of all, report the incident of discrimination or harassment to your line manager. If you do not wish to speak to your line manager, you can instead speak to an alternative line manager or to a member of the personnel department.
- Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.
- All allegations of discrimination or harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, STREIF UK must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation.
- Once the investigation has been completed, you will be informed of the outcome and STREIF UK's conclusions.
- STREIF UK is committed to taking appropriate action with respect to all complaints of discrimination or harassment which are upheld.
- You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under STREIF UK's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under STREIF UK's disciplinary procedure.

















#### 8.0 Monitoring equal opportunity and dignity at work

STREIF UK will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.

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Bill Treves Managing Director January 2020













