

POLICY FOR EQUAL OPPORTUNITIES

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POLICY FOR EQUAL OPPORTUNITIES

TABLE OF CONTENTS

1. POLICY STATEMENT	3
2. OBJECTIVES OF THIS POLICY	3
3. USEFUL DEFINITIONS	4
4. UNLAWFUL REASONS FOR DISCRIMINATION	5
5. RECRUITMENT AND JOB PROMOTION	5
6. REASONABLE ADJUSTMENTS	6
7. RESPONSIBILITY FOR THE IMPLEMENTATION OF THIS POLICY	7
8. CONTRACTS	7
9. ACTING ON DISCRIMINATORY BEHAVIOUR	7
10. THE EXTENT OF THE POLICY	8

POLICY FOR EQUAL OPPORTUNITIES

1 POLICY STATEMENT

1. Celtic Technologies Ltd and Biogénie Site Remediation Ltd. subsidiaries of EnGlobe Corp (collectively referred to the "Company") aim to be an inclusive organisation where everyone is treated with respect and dignity and where there is equal opportunity for all. The Company is committed to achieving a working environment which provides freedom from discrimination on the grounds of, but not limited to, race, colour, nationality, ethnic origin, gender, marital status, disability, religious beliefs, age or sexual orientation. The aim of this policy is to ensure that no job applicant or employee receives less favourable or unlawful treatment on grounds not relevant to good employment practice. Thus this Policy is intended to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.
2. Being integral to the fairness ethos of the Company, this Policy commits the Company to ensuring mitigation of discrimination and related unfairness when dealing with all parties associated with our business including customers, suppliers and other project stakeholders such as local authorities and agencies. Integral to this Policy, the Company also aims to provide services and conditions that do not discriminate against its customers where they can access the services and goods supplied by the Company. The Company believes that all employees, customers, suppliers and other stakeholders are entitled to be treated with respect and dignity.
3. Management and all employees have a duty to co-operate and ensure that this Policy is effective in ensuring equal opportunities and to prevent discrimination. The Company will tackle barriers to participate and create a culture in which equal opportunities and equal treatment are a priority for all employees. In the recruitment, training, pay and management of staff, and in all day-to-day work with both colleagues and customers, the Company seeks to create an environment where attitudes and biases that hinder the progress of individuals and groups are dismantled and where everyone works together in mutual respect and tolerance. Disciplinary action will be taken by the Company against any employee who breaches this policy and serious breaches will be treated as gross misconduct.

2. OBJECTIVES OF THIS POLICY

1. Eliminate, as far as is reasonably possible, and prevent all forms of unlawful discrimination.
2. Ensure that recruitment, promotion, training, development, assessment, redundancy and service provision are determined on the basis of capability, qualifications, experience, skills and productivity.
3. Ensure that suppliers are selected on the basis of good and fair business practice, capability and competitiveness.
4. Encourage all its employees to take an active role against all forms of discrimination and harassment and that they can rely upon the Company's support in cases of discrimination or harassment at work.

DESIGNATED OFFICER

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Signature:



Date: January 2019

POLICY FOR EQUAL OPPORTUNITIES

3. USEFUL DEFINITIONS

The following are terms which may be used when discussing matters of equal opportunities:

a) Discrimination

Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of race, colour, nationality, ethnic origin, gender, marital status, disability, religion, age, sexual orientation. Discrimination may be direct or indirect, intentional or unintentional.

b) Direct discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of colour, nationality, ethnic origin, gender, marital status, disability, religion, age, or sexual orientation. For example, a job advertisement which states that "only those who have English as their first language may apply".

c) Indirect discrimination

This is the application of a policy, criterion or practice to a person which the employer would apply to others but :

- is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents;
- the employer cannot justify the need for the application of the policy on a neutral basis; and
- the person to whom the employer is applying it to, suffers detriment from the application of the policy.

For example: a Manager who only offers overtime to full time members of staff (the group being directly discriminated against will be part-timers, but where female part timers form the majority of the part-time group, they would be eligible to claim indirect discrimination on the grounds of gender).

d) Victimisation

Consists of taking action against a person for asserting their rights under the law or this Policy.

e) Harassment / bullying

Harassment and bullying take many forms, occurs on a variety of grounds and may be directed at one person or many people. In general terms, it can be described as persistent unwanted behaviour which a person finds intimidating, upsetting, embarrassing, humiliating or offensive.

f) Positive Action

Positive action is allowed by law to encourage employees who are members of disadvantaged groups which have been under-represented in particular work areas to receive special training programs which would enable them to complete equally for jobs.

g) Genuine occupational qualification

The law recognises that there will be occasions when it is necessary to restrict certain jobs to certain categories or groups of people. This is rare and an employer would have to demonstrate that they have researched the requirement thoroughly before setting it. These are referred to as genuine occupational qualifications of GOQs.

POLICY FOR EQUAL OPPORTUNITIES

4. UNLAWFUL REASONS FOR DISCRIMINATION

a) Gender and marital status

It is not permissible to treat a person less favourably on the grounds of their gender or the fact they are married. This applies to both men and women. Sexual harassment of men and women can be found to constitute sex discrimination.

b) Age

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of statutory redundancy payments.

c) Disability

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to the service and ability to be employed, trained, or promoted as a non-disabled person .

d) Race, colour, nationality and ethnic origin

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

e) Sexual orientation

It is not permissible to treat a person less favourably because of their sexual orientation.

f). Religion or belief

It is not permissible to treat a person less favourably because of their religious beliefs or their religion.

5. RECRUITMENT AND JOB PROMOTION

The Company welcomes diversity amongst its employees and seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job with regard to experience and qualifications. As an employer committed to the principle of equality of opportunity, the Company will adhere to the following procedures for recruiting and selecting individuals for all positions:

a) Selection criteria

The selection process will be carried out consistently for all jobs at all levels. Selection criteria for all positions will be clearly defined and reflected in the further particulars sent to applicants, which will also include details of the Company's commitment to equality of opportunity. Job qualifications or requirements which would have the effect of inhibiting applications from members of particular groups, such as those of one sex, persons of a particular marital status or sexual orientation, persons of a particular racial group, or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done.

b) Advertising

All job advertisements and vacancies will be publicised to encourage applications from all suitably qualified and experienced people. In order to attract applications from all sections of the community, the Company will endeavour to ensure that advertisements are not restricted to areas or publications which would exclude or disproportionately reduce applications from a particular gender or racial group, and should avoid prescribing

POLICY FOR EQUAL OPPORTUNITIES

requirements regarding marital status or requirements which would exclude a particular gender or racial group. All job advertisements placed on behalf of the Company will state the Company's commitment to equality of opportunity.

c) Selection methods

The selection process will be carried out consistently for all jobs at all levels. All those handling applications and conducting interviews must be aware of the principles of the Sex Discrimination Act, the Race Relations Act, the Disability Discrimination Act, and other relevant legislation. The selection of new employees will be based on job requirements and the individual's suitability and ability necessary and justifiable for effective performance of the job, and information sought from candidates will relate only to the qualifications for or requirements of the job.

d) Interviews

The staff responsible for short listing, interviewing and making or recommending an appointment will be clearly informed of the selection criteria and the need for consistency. Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria. No questions will be based on assumptions about roles in the home and the family, or the assumed suitability of different ethnic groups for the post in question. Where it is necessary to assess whether personal circumstances will affect effective performance of the job (for example, if the job involves irregular hours or extensive travel) this will be discussed objectively and will be asked equally of all candidates. In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) should be offered to enable candidates to compete on an equal basis.

e) Job promotion

As with 'recruitment', when considering candidates for promotion, care will be taken to consider those from all races and both sexes, where general ability and experience are the main requirements. All employees will be considered solely on their merits for career development and promotion with equal opportunities for all.

Details of candidates and of selection decisions (including the rationale for selection or rejection) will be kept for at least six months after an appointment has been made, in case they are required as evidence by an employment tribunal or for other proceedings. The Company will keep records of the sex, ethnicity, and any disability of its employees and of all candidates and of those shortlisted and appointed. Records may be used to determine whether members of one sex or persons of a certain racial group or those with a disability do not apply for employment, or apply in smaller numbers than might be expected, or are shortlisted or appointed in a lower proportion than their application rate, or are concentrated in certain jobs. The Company will investigate the practicalities of monitoring progression within employment, including access to training and development, promotion and grading.

f) Training

Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part time or fixed term contract status, sexual orientation or religion. Employees will be encouraged to discuss their career prospects and training with their superior or the HR Department.

6. REASONABLE ADJUSTMENTS

The Company is committed to its duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- Making adjustments to premises;
- Re-allocating some of a disabled employee's duties;
- Transferring a disabled employee to a role better suited to their disability;

POLICY FOR EQUAL OPPORTUNITIES

- Relocating a disabled employee to a more suitable office;
- Giving a disabled employee time off work for medical treatment or rehabilitation;
- Providing specific training or mentoring for a disabled employee;
- Supplying or modifying equipment, instruction and training manuals for disabled employees;
- Other appropriate adjustments that the Company considers reasonable and necessary provided such adjustments are within the financial means of the Company.

If an employee has a disability and feels that any such adjustments could be made by the Company, they should contact the designated Officer.

7. RESPONSIBILITY FOR THE IMPLEMENTATION OF THIS POLICY

- a) It is the ultimate responsibility of the Head of Human Resources to ensure that all aspects of this Policy are kept under review and are operated throughout the Company.
- b) The co-operation of all employees is essential for the success of this Policy. However, the responsibility for achieving the objectives of this Policy, and for ensuring compliance with relevant Legislation and Codes of Practice, lies with the Company. In particular, senior employees are expected to follow this Policy and ensure that all employees, sub-contractors and agents do the same.
- c) All employees, sub-contractors and agents of the Company are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination on the grounds of race, colour, nationality, ethnic origin, gender, marital status, disability, religion, age or sexual orientation.
- d) Employees may be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.

8. CONTRACTS

All Company Contracts will include wording which ensures that those undertaking the contract understand the stance taken by the Company. The following wording will be incorporated:

- "The contractor shall not unlawfully discriminate within the meaning and scope of the provisions of the Race Relations Act 1976 or any statutory modification or re-enactment of that Act or any other relating to discrimination in employment.
- The Contractor shall take all reasonable steps to secure that all servants, employees or agents of the Contractor and all sub-contractors employed in the performance of the contract do not unlawfully discriminate as set out in Condition 1.1."

9. ACTING ON DISCRIMINATORY BEHAVIOUR

- a) All allegations of sex or racial discrimination or discrimination on the grounds of disability or sexual orientation will be dealt with seriously and confidentially.
- b) When it appears that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, circumstances will be investigated to identify any policies or criteria which exclude or discourage certain employees and, if so, whether these are justifiable.
- c) The Company emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the Company's Disciplinary Procedure. Any complaints about such behaviour shall be

POLICY FOR EQUAL OPPORTUNITIES

treated seriously. Breaches of the Company's equal opportunities Policy could lead to dismissal of the relevant Individual.

10. THE EXTENT OF THE POLICY

- a) The Company seeks to apply this Policy in the recruitment selection, training, appraisal, development and promotion of all employees. The Company seeks to ensure that all sub-contractors, suppliers and agents act in accordance with this Policy. However, the Company accepts no liability for the actions of sub-contractors and agents. The Company offers goods and services in a fashion that complies with the spirit of this Policy.
- b) This Policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as Implied, collateral or express terms to any contract made with the Company.
- c) The Company reserves the right to amend and update this Policy from time to time, or as required by legislative or policy changes.