

Equality and Diversity Policy

Alsters Kelley is an equal opportunity employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination on the grounds of colour, race, nationality, ethnic or national origin, sex, (including gender reassignment), sexual orientation, religion, religious or philosophical belief, age, marital status or physical or mental disability.

We value diversity and are committed to promoting diversity within the workplace by seeking to ensure that all individuals are treated fairly with dignity and respect and by recognising and encouraging individual contribution within the firm.

We aim to ensure that our staff achieves their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We have adopted the following equality policy as a means of helping to achieve these aims.

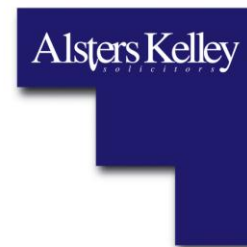
Recruitment and Training

We are committed to ensuring that all our staff and all applicants for employment are protected from unlawful discrimination in the workplace. We endeavour not to discriminate in the areas of recruitment, selection, promotion, transfer, training, access to benefits and services, discipline or dismissal. It is also our policy that all employees should be allowed to work in an environment free from harassment, bullying or unsolicited or unwelcome comments or overtures on discriminatory grounds.

Forms of Discrimination

Direct discrimination occurs where someone is put at a disadvantage or treated less favourably on discriminatory grounds in relation to his or her employment. Direct discrimination may occur even when unintentional.

Indirect discrimination occurs where the individual's employment is subject to an unjustified provision, criteria or practice which is applied equally to persons of all groups but which puts or would put at a particular disadvantage persons of a particular group and it cannot be shown to be a proportionate means of achieving a legitimate aim.



Equality and Diversity Policy

Disability discrimination occurs where an individual is unjustifiably disadvantaged in employment/recruitment for a reason connected with his/her disability unless the discrimination cannot be avoided by making reasonable adjustments.

Victimisation occurs where an individual is treated less favourably than colleagues because he/she has taken action, in good faith, to assert their statutory rights or assisted a colleague with information in that regard.

Harassment is unwanted conduct based on discriminatory grounds which affects the dignity of an individual at work or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may be visual, verbal or physical.

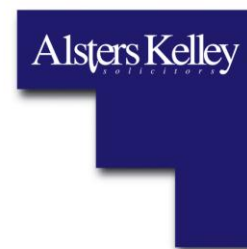
We are committed to ensuring that all our staff and applicants for employment are protected from unlawful discrimination in employment.

Implementing equality of opportunity

Recruitment and employment decisions will be made on the basis of fair and objective criteria. Our selection procedures are reviewed from time to time to ensure that they are appropriate for achieving our objectives and for avoiding unlawful discrimination.

The requirements of job applicants and existing members of staff who have or have had a disability will be reviewed to ensure that whatever possible reasonable adjustments are made to enable them to enter into or remain in employment with us. Promotion opportunities, benefits and facilities of employment will not be unreasonably limited and every reasonable effort will be made to ensure that disabled staff participate fully in the workplace.

Employment descriptions will be limited to those requirements which are necessary for the effective performance of the job. Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary.



Equality and Diversity Policy

In accordance with recommended practice the ethnic, gender, religious, sexual orientation and age composition of our staff and applicants for jobs will be monitored on an anonymous basis at all levels. We will follow the safeguards outlined in the Data Protection Act 1998 concerning the collation of such sensitive data.

The HR department will co-ordinate the policy's implementation and can deal with any queries relating to it.

Monitoring and Review

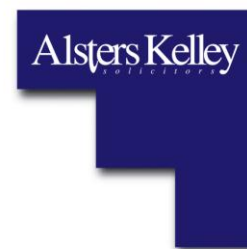
The Firm will regularly monitor the effectiveness of this policy and review and update its policy, procedures and rules on equal opportunities and harassment as and when necessary.

Harassment Policy

Harassment can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other staff not themselves the object of unwanted behaviour but who witness it or who have knowledge of the behaviour.

All staff are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment can give rise to civil and criminal liability both on the part of the employee causing the harassment and on the part of the employer. Harassment on grounds of colour, race, nationality, ethnic or national origin, sex, (including gender reassignment), sexual orientation, religion, religious or philosophical belief, age, marital status or physical or mental disability is also likely to constitute unlawful discrimination.

We treat harassment as a disciplinary offence and incidents will be dealt with under the disciplinary procedure.



Equality and Diversity Policy

Harassment is either:

- Unwanted conduct (whether verbal or otherwise) which is based on someone's colour, race, nationality, ethnic or national origin, sex, (including gender reassignment), sexual orientation, religion, religious or philosophical belief, age, marital status or physical or mental disability which either violates the individual's dignity or creates an intimidating, humiliating or offensive environment for the individual; or
- Bullying of colleagues, especially junior colleagues by intimidatory behaviour.

A single incident can amount to harassment if sufficiently grave.

Informal stage

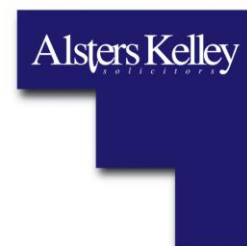
It is entirely in order for a recipient of unwanted conduct amounting to harassment to try to resolve the problem, if he/she wishes to do so, by explaining to the individual concerned that the behaviour is not welcome, that it offends or makes the recipient uncomfortable and that it interferes with their work.

Anyone who has been subjected to harassing or bullying behaviour may seek confidential assistance from Human Resources. An informal approach to a member of HR will be treated as completely confidential and will not result in any report to anyone within the firm unless you agree.

The informal stage will not result in any formal internal investigation or disciplinary action, but is intended to enable you to resolve the matter yourself without it going any further in the firm.

Grievance and Discipline

All members of staff have a right to equality of opportunity and dignity at work and a duty to implement this policy. Breach of the equal opportunity and harassment policy is potentially a serious disciplinary matter.



Equality and Diversity Policy

Anyone who believes that he or she may have been harassed, bullied or disadvantaged on discriminatory grounds, where informal resolution is not appropriate, is not requested or where the outcome has been unsatisfactory, may bring a formal complaint (in writing) through the firm's grievance procedure.

Investigations will be carried out with sensitivity and with due respect for the rights of both the complainant and the alleged harasser. All those interviewed will be permitted to be accompanied by a friend, colleague or representative of their trade union or professional organisation.

The importance of confidentiality will be stressed to all those interviewed and everyone will be strictly required not to discuss the complaint with colleagues or friends. Breach of confidentiality may give rise to disciplinary action.

The investigation will focus on the facts of the complaint. Notes will be kept of all stages of the investigation and those interviewed will receive notes of the interview to agree. Parties will not be required to repeat distressing or embarrassing details any more than is necessary.

Wherever possible, consideration will be given to ensuring that the complainant and the alleged harasser are not required to work together whilst the complaint is under investigation.

The complainant will be kept informed of the general progress of the process of investigation and will be informed whether the complaint has been upheld and is to result in disciplinary action. The rights of the alleged harasser as to the confidentiality of the details of any disciplinary sanction will be respected.

Where a complaint has been upheld, consideration will be given, wherever possible, to permitting the complainant to choose whether they wish to remain in their current post or to transfer. The firm will seek to ensure that the complainant is not in any way penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the harassment has stopped.

Even where a complaint is not upheld, for example where the evidence is inconclusive, consideration will be given to effecting arrangements which will enable the parties not to continue to work together against the wishes of either party,



Equality and Diversity Policy

Details of all formal complaints of harassment will be collated by the HR department. These will be reviewed annually with a view to ensuring that every effective step has been taken to prevent harassment at work and to monitor the effectiveness of the complaints procedure.

Any complaint that is unfounded and not made in good faith, for example a malicious complaint will be treated as a disciplinary offence.

CONTACT:

Sushila Jones
Human Resources

Telephone Number: 0844 561 0100
Direct Dial: 0844 561 0265
Email: sushila.jones@alsterskelley.com