

General

- Siamo Group is committed to the policy of equal treatment of all employees and applicants, etc., and requires all employees, of whatever grade or authority, to abide by and adhere to this general principle and the requirements of the Codes of Practice issued by the Equal Opportunities Commission and the Commission for Racial Equality (and, in Northern Ireland, the Fair Employment Commission).
- 2. All employees are expected to abide by the requirements of the Equality Act 2010 Specifically discrimination is prohibited in:
 - 2.1. Treating any individual on grounds of sex, colour, marital status, race, nationality or ethnic or national origin, religion, sexual orientation, disability, age or membership or non-membership of a trade union, less favourably than others.
 - 2.2. Expecting an individual solely on the grounds stated above to comply with requirement(s) for any reason whatsoever related to their employment, which are different to the requirements for others.
 - 2.3. Imposing on an individual's requirements which are in effect more onerous on that individual than they are on others. For example, this would include applying a condition (which is not warranted by the requirements of the position) which makes it more difficult for members of a particular race or sex to comply than others not of that race or sex.
 - 2.4. Victimisation of an employee.
 - 2.5. Harassment of an employee (which for the purposes of this policy, and the actions and sanctions applicable thereto, is regarded as discrimination).
 - 2.6. Any other act, or omission of an act, which has as its effect the disadvantaging of an employee or applicant against another, or others, purely on the above grounds.
 - 2.7. Thus, in all disciplinary matters as well as consideration for training, promotion, etc. in other words all instances where those in control of employees are required to make judgements between them it is essential that merit, experience, skills and temperament are considered as objectively as possible.
- 3. Siamo Group commits itself to the immediate investigation of any claims of discrimination on the above grounds, and, where such is found to be the case, a requirement that the practice cease forthwith, restitution of damage or loss (if necessary), and to the investigation of any employee accused of discrimination.
- 4. Any employee (no matter what level) found guilty of discrimination will be instructed to desist forthwith. Since discrimination in its many forms is against Siamo Group's policy, any employee offending will be dealt with under the disciplinary procedure. Unless assurances of future nondiscriminatory actions are forthcoming, an employee repeating any act of discrimination may be dismissed.
- 5. Siamo Group recognises the right of an employee to belong to, or not to belong to, a trade union, and membership or non-membership of such a union will not be taken into account in any way during the career of the employee.
- 6. Siamo Group commits itself to the employment of disabled personnel whenever possible, and will treat such employees in aspects of their recruitment and employment in exactly the same manner as other employees, the difficulties of their disablement permitting. Assistance will be given, wherever possible, to ensure that disabled employees are helped in their journeys to and from their place of work, in access to their workplace, in gaining access to the facilities on company premises, and in progressing in their career, subject only to the



opportunity existing, the applicant's suitability, talent, and wish for it. Appropriate training will be made available to such personnel who request it. Siamo Group Employment Agency is keen to hear ideas whereby its facilities can be made more user-friendly for the benefit of the disabled.

Complaints Procedure

- 1. In the event that any employee feels that he or she has suffered discrimination in any way Siamo Group's grievance procedure should be utilised.
- 2. If the complaint is against the employee's own immediate or other superior, confidential application should be made to Tony Bucciero, Managing Director, who may authorise immediate reference to the next tier of management if this seems appropriate in the circumstances.
- 3. In instances of sexual harassment, as far as possible, the anonymity of the complainant should be protected.
- 4. It should not be overlooked that an employee who discriminates or harasses may be liable for payment of damages to the person offended, in addition to any damages payable by the company should it have failed to ensure the practice ceased forthwith. Under the Criminal Justice Act 1994, harassment became a criminal offence punishable by a fine of up to £5,000 and/or a prison term of up to six months.
- 5. To make a complaint of discrimination, harassment, victimisation, or unfair treatment it will be necessary to have available:
 - 5.1. Details of what, when, and where the occurrence took place.
 - 5.2. Any witness statements or names.
 - 5.3. Names of any others who have been treated in a similar way.
 - 5.4. Details of any former complaint made about the incident, date, where and to whom made.
 - 5.5. A preference for a solution to the incident.
- 6. Until a hearing is arranged, complainants should keep the matter confidential, other possibly than arranging for details of witnesses to be given to Tony Bucciero, Managing Director.