

TSG UK SOLUTIONS LTD

Company Policy & Procedures

EQUALITY AND DIVERSITY POLICY

TSG is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, and selection for redundancy and dismissal.

The Company will take all reasonable steps to employ, train and promote employees based on experience, abilities and qualifications without regard to age, disability, gender, marriage, civil partnership, pregnancy, maternity, race (including colour, nationality and ethnic or national origins), religion, belief, sex or sexual orientation.

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and free from harassment and bullying.

All employees are responsible for conducting themselves in accordance with this policy. The Company will not condone or tolerate any form of discrimination and/or harassment engaged in by employees or by outside third parties who do business with the Company e.g. clients, customers, contractors, and suppliers.

This Policy covers discrimination, bullying and harassment in the workplace and any work-related setting (e.g. during business trips and at work-related social events) however any such acts outwith the workplace or work-related settings will also be considered under this Policy.

Employees have a duty to co-operate with the Company to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper 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 could be held personally liable for any act of unlawful discrimination or harassment as employees who commit serious acts of discrimination or harassment may also be guilty of a criminal offence.

Employees should draw the attention to company management of suspected discriminatory acts or practices or suspected cases of harassment or bullying. 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 the Company's disciplinary procedure.

The Company will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful discrimination or harassment against its employees.

TSG views discrimination, harassment and bullying as a serious issue and will do everything in its power to ensure that any employee who has brought a claim will not suffer any form of victimisation for having done so however, equally the company has a responsibility to all its employees, therefore any employee who make's false accusations (e.g. in spite) will be dealt with under the disciplinary procedure up to and including the dismissal stage.

Direct discrimination: When a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

Indirect discrimination: Applying a requirement or condition, which, although applied equally to all persons, is such that a substantial proportion of a particular group, could not comply with it and which cannot be shown to be justifiable.

The Company will take all reasonable steps to eliminate direct and indirect discrimination in all aspects of employment.

Recruitment, advertising, and selection: The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection and 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 relevant experience, abilities, and qualifications.

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

- Ensure advertisements are not confined to those areas or publications, which would exclude or disproportionately reduce the numbers of applicants with a protected characteristic.
- Avoid setting any unnecessary provisions or criteria, which would exclude a higher proportion of applicants with a particular protected characteristic.

Where promotion or transfer may fill vacancies, jobs will be published to all eligible employees in such a way that they do not restrict applications.

The selection process will be carried out consistently for jobs at all levels. HR & other employees responsible for short-listing, interviewing, and selecting candidates will be clearly informed of the selection criteria and the need for their consistent application. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Wherever possible, two interviewers will interview applicants and all questions asked of the applicants will relate to the requirements of the job. The selection of new employees 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, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria and practices, or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Training and promotion; The Company will train line managers in the Company's policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices or acts of harassment or bullying. Line managers will be responsible for ensuring they actively promote equal opportunity within the departments for which they are responsible.

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 direct or indirect discrimination because of one or more of the protected characteristics.

Equal pay; The Company 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, the Company will endeavour to maintain a pay system that is free from bias and based on objective criteria.

Bullying and Harassment; Bullying is offensive or intimidating behaviour or an abuse or misuse of power, which undermines or humiliates an employee.

Harassment is when an employee engages another employee in unwanted conduct, including of a sexual nature or related to gender or sex, which has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that other employee. This also includes that because of that other employee's rejection of or submission to the conduct, they are treated less favourably than they would have if they had not rejected, or submitted to, the unwanted conduct.

Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for him or herself what behaviour they find acceptable to them. Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples of Bullying & Harassment: Examples of unacceptable behaviour, which may be verbal, written, or physical, and include, but are not limited to, the following:

Unwelcome sexual advances, requests for sexual favours, and other conduct of a sexual nature; objection to obscene or other sexually suggestive or racist comments or gestures, other derogatory comments or gestures, the offer of rewards for going along with sexual advances or threats for rejecting sexual advances, jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory; demeaning comments about an employee's appearance, questions about an employee's sex life, the use of unwanted nicknames whether made orally or by e-mail, picking on or ridiculing an employee, isolating an employee or excluding him or her from social activities or relevant work-related matters,

Reporting complaints of Bullying & Harassment: The company operates a zero tolerance policy.

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. Employees who wish to make a complaint of discrimination should use the Company's grievance procedure. The Company encourages employees who believe they are being harassed or bullied to notify the offender (by words or by conduct) that his or her behaviour is unwelcome. The Company also recognises that status disparities, or if the behaviour relates to third parties such as contractors, suppliers, customers, may make such confrontation impractical, therefore in the event that such informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, employees should follow the procedure set out below.

- Report the incident to line manager, or if not practical, to another manager or to a member of HR
- Report should be made promptly so that investigation may proceed and any action taken quickly.
- The allegation will be promptly investigated and employee will be interviewed and asked to provide a written witness statement setting out the details of the 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, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. For example, the identity of the complainant and the nature of the allegations must be revealed to the alleged harasser so that he or she is able to fairly respond to the allegations. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

- Once the investigation has been completed, employee will be informed in writing of the outcome and the conclusions and decision as soon as possible. The Company is committed to taking appropriate action with respect to all complaints of harassment which are upheld. If appropriate, disciplinary proceedings will be brought against the alleged harasser.
- Employee will not be penalised for raising a complaint, even if not upheld, unless the complaint was both untrue and made in bad faith when appropriate disciplinary action will be taken against the complainant.
- If the complaint is upheld and the harasser remains in employment, the Company will take all reasonable steps to ensure that employee does not have to continue working alongside him or her if they do not wish to do so however there may be occasions where this is impractical. The Company will discuss the options with the employee.
- If the complaint is not upheld, arrangements will be made for employee and the alleged harasser to continue or resume working and to repair working relationships. A conciliation meeting may be arranged, this would be attended by both parties as well as HR or the line / senior manager as appropriate.

Any employee who is found to have discriminated against or bullied or harassed another employee or third party e.g. customer, supplier, contractor etc. in violation of this policy will be subject to disciplinary action under the Company'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 however had taken no action to eliminate it, will also be subject to disciplinary action under the Company's disciplinary procedure.

Monitoring Equal Opportunity and Dignity 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 opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.

The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.