

Equal Opportunities Statement of General Policy

Sundial Group is committed to the principle of equal opportunity in employment and will ensure that recruitment, selection, training, development and promotion procedures result in no job applicant or employee receiving less favourable treatment on the grounds of race, colour, nationality, ethnic or national origin, religion or belief, disability, trade union membership or non-membership, sex, sexual orientation, marital status, or being a part-time or fixed-term worker. Sundial Group's objective is to ensure that individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.

Management has the primary responsibility for successfully meeting these objectives by:

- a. Not discriminating in the course of employment against employees or job applicants
- b. Not inducing or attempting to induce others to practise unlawful discrimination
- c. Bringing to the attention of employees that they will be subject to disciplinary action for discrimination of any kind.

Sundial Group expects all Managers to ensure that this policy and procedure is known, understood and adhered to at all times.

Employees are encouraged to contribute to the equal opportunities policy by:

- a. Not discriminating against fellow employees, customers, suppliers or members of the public with whom they come into contact during the course of their duties.
- b. Not inducing or attempting to induce others to practise unlawful discrimination.
- c. Reporting any discriminatory action to the appropriate Manager.

All new employees will be informed of Sundial Group's policy towards harassment at induction, when it will be stressed that all complaints of harassment will be treated very seriously.

Sundial Group recognises the sensitive nature of complaints of harassment. Employees who wish to discuss such complaints in confidence are able to contact the Human Resources Director. Employees that consider themselves to be a victim of unlawful discrimination may raise the issue through Sundial Group's Grievance Procedure.

Anti-harassment

Sundial Group deplores all forms of harassment, including bullying, and seeks to ensure that the working environment is sympathetic to all its employees. The following procedure informs employees of the type of behaviour that is unacceptable and provides employees who are the victims of harassment with a means of redress.

Procedure

Harassment at work is unlawful, and both Sundial and the harasser may be held liable for such unlawful actions, and be required to pay damages. Harassment can reduce the effectiveness of Sundial by undermining the confidence of employees, creating a threatening environment, and increasing sickness absence and labour turnover. Employees have the right to work in an environment free from intimidation.

Definitions

Harassment takes many forms from relatively mild banter to actual physical violence. Employees may not always realise that their behaviour constitutes harassment; they must recognise that what is acceptable to one employee may not be acceptable to another. Harassment is unwanted behaviour by one employee towards another.

Examples of harassment include, but are not limited to:

- a) Insensitive jokes and pranks
- b) Lewd comments about appearance
- c) Unnecessary body contact
- d) Displays of sexually offensive material, e.g. pin-ups
- e) Repeated instances of minor harassment acts
- f) Requests for sexual favours
- g) Speculation about a person's private life and or sexual activities
- h) Threatened or actual violence
- i) Threat of dismissal, loss of promotion, etc for refusal of sexual favours
- j) Remarks, racially explicit statement, graffiti, jokes of a racist nature.
- k) Offensive publications
- l) Offensive letters / memos
- m) Racist, graffiti threatening behaviour
- n) Racist jokes / ridicule
- o) Derogatory 'nicknames'
- p) Mimicking the effect of a disability
- q) Disregarding wishes or feelings
- r) Ostracising or 'freezing out'
- s) Making fun of a disability
- t) Use of inappropriate terms, e.g. 'cripple' or 'spastic'
- u) Withholding essential information / training / resources
- v) Setting impossible objectives (i.e. to ensure failure)
- w) Unreasonably changing objectives / priorities
- x) Allocating work / duties / responsibilities unreasonably
- y) Excessive supervision / detailed checking of work
- z) Public reprimand / humiliation, ridicule, sarcasm
- aa) Bullying.

The examples above are not exhaustive. Items (h) and (i) are obvious examples of gross misconduct, punishable by summary dismissal, but other items may constitute gross misconduct depending on the circumstances of the case in question, but in any case are likely to incur serious disciplinary action.

Sundial Group Ltd is registered in the UK no: 3432674 and its registered office is Highgate House, Creaton, Northampton, NN6 8NN
This policy also applies to Sundial Group's subsidiary companies.

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Further information may be obtained by calling +44 (0)1604 731731, emailing info@sundialgroup.com or visiting www.sundialgroup.com