



DIVERSITY POLICY

The Company is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the organisation.

The Company will not discriminate on the grounds of race, gender, disability, nationality, religion, age, sexual orientation, family status or any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in line with the Company's disciplinary policy.

Objectives relating to fair and inclusive practices will be included in all employees' performance indicators and will form an integral part of performance reviews throughout the year.

The policy is applicable to all employees, clients, communities, suppliers and contractors, whether permanent or temporary. The policy applies to all processes relating to employment and training and to any dealings with customers and clients. Decisions relating to customers and communities will be based on business-related criteria only and any irrelevant information will not form part of the process.

The policy will be reviewed on an ongoing basis to reflect changes in the law, demographics and internal business requirements. Progress relating to the policy will be recorded annually and a full report will be presented to the senior management team to debate progress and review the policy status.

The Company is committed to the following processes:

Leadership

The Company has:

- identified a senior level champion for leading the diversity strategy, the HR Manager; and
- secured top-level ownership and sponsorship for the programme from the Chief Executive and Chairman of the Board of Directors.

Audit

The Company will periodically:

- undertake a full audit in relation to policies and procedures, practice of policy and perception of policy and process;
- obtain workforce metrics and compare them with sector and best practice organisations; and
- produce a risk analysis report for senior board members to act as a catalyst for future activity across the business.



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The audit will include a review of all the processes to establish the Company's position with regard to compliance and best practice. This will be done via the Equality & Diversity and Employee Forums to establish employees' perceptions.

Policy development

The Company:

- benchmarks existing policy statements from other organisations and advisory groups;
- develops human resources and other policies and cascades new policies with Chief Executive endorsement through business briefings.

Training and education

The Company:

- conducts training needs analysis relating to the understanding and management of diversity;
- consults key stakeholders and players on the organisational learning requirements;
- integrates diversity into mainstream training and development programmes; and
- integrates diversity competencies into development programmes and assessment and selection processes.

Communication and consultation

The Company has:

- established key lines of communication across the business through consultation with key stakeholders;
- distributed a top-level communications plan to senior management for team briefings, and develop "reporting back" communication lines to ensure feedback; and
- ensured that mainstream business communications reinforce the inclusive messages and become mainstreamed into day-to-day processes.

Resources

The Company has:

- formal reporting lines for monitoring progress against targets and objectives;
- an Equality & Diversity Forum with representatives from across all parts of the organisation;
- secured commitment for financial sign-off from the Chief Executive to enable related activities to be undertaken (for example reasonable adjustments to comply with the Disability Discrimination Act 1995, and communication and training programmes).



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Measurement

The Company:

- captures all available workforce metrics from existing databases to benchmark against sector companies, demographics and best practice standards;
- is working towards targets for the workforce composition over a five-year period with the Chief Executive, the Board and the Equality & Diversity Forum;
- uses formal measurement tools to assess the climate in the Company (for example staff surveys); and
- has relationships with external benchmarking bodies to assess progress.

External profile

The Company:

- has good relationships with organisations in order to network, exchange best practice and generally raise the Company's profile;
- has good relationships with trade, and the local and national press to develop a good external image and to position the Company at the leading edge;
- actively seeks to learn and develop diversity best practice; and
- promotes and markets the Company's diversity best practice with mainstream business.