

EQUAL OPPORTUNITY POLICY OF LOCKHART GARRATT LIMITED

1 Introduction and aims of the policy

- 1.1 We endeavour to create an open and supportive environment at work for the mutual benefit of all employees and the Company. All employees should be treated and should treat others with respect and dignity.
- 1.2 The Company embraces an equal opportunities culture and is an equal opportunities employer. The Company is committed to ensuring that equal opportunities exist for all staff and job applicants, including (but not limited to) access to training, learning, promotion and progression.
- 1.3 We are committed to ensuring that all of our staff and applicants for employment are protected from unlawful discrimination in employment. The aim of the equal opportunities policy is therefore to protect employees and job applicants from:
- 'Direct Discrimination' – defined as less favourable treatment on the grounds of sex, marital status, race, colour, national origins, religion, belief or sexual orientation; or in the cases of disability or age, is subject to less favourable treatment which cannot be justified.
 - 'Indirect Discrimination' – defined to cover the application of a provision, criterion or practice which is applied equally to those of the same sex, marital status, age, race, religion, belief or sexual orientation, but which puts persons of the sex, marital status, age, race, religion, belief or sexual orientation in question at a disadvantage compared to others, and which cannot be shown to be a proportionate means of achieving a legitimate aim.
 - 'Victimisation' – defined as less favourable treatment because an employee has either: brought discrimination proceedings against the Company (or any other person); given evidence or information in connection with discrimination proceedings or alleged discrimination; or otherwise done anything under the relevant legislation.
 - 'Harassment' – defined as unwanted conduct which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. See the Company's Harassment Policy for further details.
- 1.4 Appropriate training will be given to those in a managerial / leadership role to enable them to implement and uphold our commitment to equality of opportunity.
- 1.5 Awareness of our policy and company culture shall be discussed at the induction of new employees.
- 1.6 Recruitment and employment decisions will be made on the basis of fair and objective criteria, and those processes shall incorporate current and relevant best practice.

2 Responsibility for equal opportunities

2.1 The Directors are ultimately responsible for the implementation of this policy, its regular review and monitoring. However, individual employees at all levels also have responsibilities. Employees are required to actively co-operate with this policy. In particular, employees should:

- co-operate with measures introduced to ensure equal opportunity and non-discrimination;
- consider and suggest ways in which the Company's processes, procedures and facilities can be tailored to assist those employees who are disabled and to facilitate the recruitment of disabled employees;
- not themselves discriminate in the course of their employment against other members of staff, clients or members of the public with whom they come into contact during the course of their duties or discriminate in the acceptance of instructions from clients or instruction of counsel;
- not induce or attempt to induce other employees to practice unlawful discrimination;
- not victimise or attempt to victimise individuals on the grounds that they have made complaints or provided information in relation to discrimination;
- not harass, abuse or intimidate other employees on account of their sex, race, national origin, disability, religion, belief of sexual orientation, for example, in an attempt to discourage them from continuing their employment; and
- inform a Director or a human resources representative if they suspect that discrimination or harassment is taking place in employment.

2.2 In particular, the Company aims to:

- make the policy on equal opportunities clear to employees; and
- ensure that grievances are dealt with in a consistent manner, so far as is possible.

Breach of the equal opportunity policy is potentially a serious disciplinary matter. Anyone who believes that he/she may have been disadvantaged on discriminatory grounds is entitled to raise the matter through the Company's grievance procedure.

Dated November 2008