

MODUS: *Equal opportunities Policy*

Gordon House, Greencoat Place, London SW1P 1PH

Equal opportunities

Equal opportunities policy

Workplace Futures Group (Company) and all its subsidiaries are committed to equality of opportunity and recognises the benefits of diversity within its workforce. Our employment decisions are based on ability and potential regardless of employment status, age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (colour, nationality, ethnic or national origin), religion and belief, sex or sexual orientation (“Protected Characteristics”).

The Company will not tolerate any incidences of harassment or bullying within the workplace, whether on the grounds of employment status, age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (colour, nationality, ethnic or national origin), religion and belief, sex or sexual orientation (“Protected Characteristics”) or otherwise. This includes unwarranted or offensive conduct or behaviour, which can make an individual feel threatened, humiliated and/or undermined within the workplace.

A further explanation of our commitment to ensuring fair treatment of all employees is outlined below. However, further advice and guidance can be obtained from your line manager or the board of directors.

Our commitment to equality

Workplace Futures Group (Company) and all its subsidiaries have a clear commitment to ensuring equality in the manner in which it carries out its business and employs staff. No person or group of individuals will be treated less favourably because of their employment status, age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (colour, nationality, ethnic or national origin), religion and belief, sex or sexual orientation (“Protected Characteristics”).

Our approach to equality is embraced by the following working practices:

- The company strives to provide a working environment where equal opportunities are promoted, and discriminatory practices are prohibited. All employees are expected to conduct themselves in a manner supporting this at all times.
- Management have a specific responsibility for ensuring decisions affecting employees or potential employees are made in a non-discriminatory manner and that equality cascades throughout the company.
- Equality applies to all aspects of employment including recruitment and selection, promotion, training and development and pay and conditions of employment. All employees are required to take a sensitive and consistent approach to equal opportunities. The company reviews its facilities and working practices to ensure they cater for people with special requirements or disabilities.

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All employees have a role to play to ensure equality exists within the work place and to ensure they do not partake, condone, permit, encourage or stand idly by whilst inappropriate conduct is directed towards an individual. All employees must ensure that any discriminatory practices are reported to management. If employees are found to be in breach of this equal opportunities policy, disciplinary proceedings will be initiated.

Dealing with discrimination, harassment and bullying

It is important to remember that it is not the intention of the perpetrator that is the key in deciding whether discrimination, harassment or bullying has occurred, but whether the behaviour is unacceptable by normal standards. All employees should consider whether their actions could be deemed inappropriate or offensive to others at all times, including on Company social events and training courses. Failure of employees to adhere to these guidelines may result in the company instigating disciplinary proceedings, which, in some cases, could lead to dismissal.

Bullying behaviour

Bullying is action or comments which the recipient views as demeaning or unacceptable. It can be one incident or a series of incidents. It applies to employees, staff and contractors. You can be personally liable to someone for bullying them.

Examples of bullying or harassment

This list is included to indicate some examples of bullying or harassment covered by this Policy (it is not an exhaustive list).

Physical: unwanted physical contact or intimidation, including unnecessary touching, patting or brushing against another employee, assault, coercing sexual behaviour, physical threats, insulting or abusive behaviour or gestures.

Verbal: remarks about appearance, derogatory or lewd comments, innuendoes, persistent name calling, statements which are suggestive, unwelcome, abusive and offensive.

Behaviour: that denigrates or ridicules; intimidatory or physical abuse; making threats; attempts to stir up hatred against an individual or group.

Other: display or circulation of material (posters, magazines, calendars) which are sexually or racially offensive or degrading.

Legitimate and constructive criticism by management to improve employee performance is not bullying or harassment.

If any employee makes an allegation frivolously or maliciously or for personal gain, action may be taken against that employee. If an employee makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against that employee.

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Resolving discrimination, harassment or bullying

The following provides an outline of the informal and formal procedures that may be instigated as a result of alleged cases involving discrimination and/or harassment.

Informal resolution: stage 1

The first step to take is to try to resolve the problem informally. This involves explaining to the alleged perpetrator that you find their behaviour unwelcome, offensive and that you wish their behaviour to cease. In circumstances where it is difficult or uncomfortable for you to resolve the problem by yourself you should speak to a manager or the board of directors who can provide you with confidential advice and assistance.

Making a formal complaint: stage 2

If the problem cannot be resolved informally you should make a formal complaint in writing to your manager or the board of directors who will consider the most appropriate action to resolve your complaint setting out the details of the complaint including the date and time of what happened, any witnesses, your feelings at the time the response of the harasser and any effect on your subsequent work.

A procedure will then be instigated in compliance with the grievance procedure.

Impartiality and fairness underpin the company approach to such matters, so the career and reputation of each party is not unjustly affected. Any breach of confidence by persons involved in discrimination or harassment cases will constitute misconduct and may be subject to disciplinary action.

A person who genuinely feels that they have been subject to discrimination, harassment or bullying and who raises the matter in accordance with these procedures will not be subject to any detrimental treatment as a result of the complaint. Retaliatory action by the person accused of the allegation against a person making a genuine complaint of harassment, discrimination or bullying is a disciplinary offence.

Unwarranted malicious allegations of discrimination and/or harassment and bullying may be regarded as gross misconduct and be subject to disciplinary action.

Further assistance

There is a Health & safety Executives website (www.hse.gov.uk) which may be helpful to you if you are concerned you may have been bullied or harassed at work or you may also like to contact www.banbullyingatwork.com



Toby Benzecry

For and on behalf of Workplace Futures Group Ltd