



## **EQUAL OPPORTUNITIES POLICY**

1. This policy applies to the AFE Group Ltd companies throughout the world. Specific references to legislation are to legislation of the United Kingdom but the underlying principles and practical requirements of the policy are universally applicable.
2. The company is committed to the policy of equal treatment of all employees and applicants for employment and requires all employees to abide by and adhere to this general principle, all relevant legal requirements and the requirements of the Codes of Practice issued by the Equal Opportunities Commission and the Commission for Racial Equality.
3. It is recognised that an effective equal opportunity policy will help all staff to develop to their full potential, which is clearly in the best interests of both our staff and our business. The aim is to ensure that not only is the relevant legislation adhered to but also do whatever is necessary to provide genuine equality of opportunity.
4. It is expected that everyone who works for the AFE Group Ltd be treated and to treat others with respect and the use of appropriate language and behaviour is upheld at all times. The aim is to provide a working environment free from harassment, bullying, intimidation, or discrimination in any form that may affect the dignity of the individual.
5. The company requires all operating units throughout the Group to adopt an Equal Opportunities policy reflecting the general principles set out in this statement, to implement the policy and to have in place an effective complaints procedure. All units shall have mechanisms in place to ensure that such policy is regularly updated to correspond with Group policy and to reflect any changes to relevant legal and other issues.
6. All employees are expected to abide by the requirements of applicable legislation including the Race Relations Act 1976, Sex Discrimination Act 1975, the Disability Discrimination Act 1995, the Employment Equality (Belief of Religion) Regulations 2003, the Employment Equality (Sexual Orientation) Regulations 2003, the Civil Partnership Act 2004 and the Employment Equality (Age) Regulations 2006. Subject to the provisions of the applicable legislation, the following are specifically prohibited:
  - (a) discriminating against its employees on the basis of their gender, sexual orientation, marital status, civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability, age, pregnancy, membership or non-membership of a trade union or the fact that they are a part-time worker or a fixed-term employee
  - (b) imposing requirements on an individual which are, in effect, more onerous on that individual than they are on others, and which are not warranted by the requirements of their position;

- (c) victimisation or harassment of an employee or any third party (which for the purposes of this policy, and the actions and sanctions applicable thereto, is regarded as discrimination); or
  - (d) any other act or omission which, as its effect, places an employee or applicant at a disadvantage against another (or others) purely on the above grounds.
- 7. Thus, in all employment matters (including but not limited to recruitment and selection, training and development, promotion and disciplinary matters), it is essential that merit, experience, skills and temperament are considered as objectively as possible.
  - 8. The company will investigate any claims of discrimination on the grounds stated in item 4, and, where such discrimination is found to have taken place the company shall take action to ensure that the discriminatory practice shall cease forthwith.
  - 9. Any employee found guilty of discrimination will be instructed to desist forthwith. Since discrimination in any form is against company policy, any employee offending will be dealt with under the disciplinary procedure up to and including dismissal.
  - 8. The company commits itself to the employment of disabled personnel whenever possible and will treat such employees in aspects of their recruitment and employment in exactly the same manner as other employees, the difficulties of their disablement permitting. Assistance will be given, wherever possible, to ensure that disabled employees are helped in access to their workplace, and in progressing in their career, subject only to the opportunity existing, the applicant's suitability, talent, and wish for it.
  - 9. All employees will be encouraged to undertake such training as may equip them to develop skills to be used in their employment.
  - 10. It shall be the responsibility of the **Business Unit Operations Directors**:
    - (a) to implement this policy within the company ensuring that the heads of individual operating units carry out the policy at their units
    - (b) to submit a report every year to the **Chief Executive Officer** on principal developments relating to the implementation of this policy and on progress towards long-term objectives
    - (c) to report immediately to the **Chief Executive Officer** any occurrence in breach of the policy having serious implications, such a verbal report to be followed by written details as soon as is practicable.

The **Chief Executive Officer** can be contacted in writing to the registered office address, 35 Bryggen Road, North Lynn Industrial Estate, Kings Lynn, Norfolk, PE30 2HZ. Alternatively, they can be contacted by e-mail at [info@theafegroup.com](mailto:info@theafegroup.com) or by telephone on +44 (0) 1553 817 554.

**Tim Smith**  
**Chief Executive Officer**  
**AFE Group Ltd**