



Equal Opportunities Policy

Introduction

Silver Blaze Ltd is committed to a policy of Equal Opportunities for all. This document is designed to supplement our programme of Equal Opportunities training and to provide guidance to all staff about the laws relating to Equal Opportunities, about our company policy and about your individual responsibilities as managers, supervisors and employees.

The Company believes that the vast majority of our employees share our commitment to equal opportunities and to the elimination of unfair treatment or discrimination in all its forms. It also makes good business sense that we all work positively towards the elimination of any and all forms of discrimination. Our success is entirely dependent on employing and retaining the best people available, irrespective of ethnic origin, sexual orientation, religious belief, sex or disability. Selection must be handled in a scrupulously fair way to maximise the pool of talent we are able to recruit from and when people join the Company, we must treat all with the respect and courtesy we would expect ourselves.

As an industry we have an image of being "macho". Often our language and behaviour are robust and sometimes individuals may be sensitive to the hurt, which such language can cause. This is particularly serious when inflicted on someone due to reasons relating to their ethnic origin, nationality, sexual orientation, religious belief, sex or disability. We have to make it absolutely clear that the Company will not tolerate such standards of behaviour. We must all understand this, and every manager must not only lead by example, but also take immediate action when any incident is reported to them. No such incident is to be treated lightly and managers must give time to listen to, understand and deal effectively with any complaints.

Any incidents or actions, which are shown to infringe our Equal Opportunities Policy, will result in disciplinary action including, where appropriate, dismissal. Advice is available both to individuals affected and to managers, to whom such matters may be reported, about how to deal effectively with any such situations. Anyone who is in any doubt should seek that advice as soon as possible by, in the first instance, contacting your Director. Please read this document, remember what it says and retain it for reference. Experience has shown us that Equal Opportunities cannot be taken for granted. We must constantly be aware of what we are doing and mindful of the effect our actions may have on others.

Equal Opportunities Policy Statement

Silver Blaze is an Equal Opportunity Employer. The Company policy is that no job applicant or employee will receive less favourable treatment on the grounds of ethnic origin, nationality, sexual orientation, religious belief, sex or disability, or is disadvantaged by any other condition or requirement that is not essential for carrying out the job. The effectiveness of



the Company will only be improved by developing the skills and abilities of all employees and the policy, above all else, aims to achieve this objective.

Entry into the Company and progression will be determined solely by the application of objective criteria, personal performance and merit. As a result, recruitment and other employment decisions and procedures will be monitored and reviewed and, where necessary, they will be changed to ensure that everyone is treated fairly. Where there is under-representation of particular groups, the circumstances will be investigated and, where appropriate, practical measures taken to remedy the situation.

Eliminating discrimination and providing equality of opportunity depends on the personal commitment of all employees, who therefore have a personal responsibility for the implementation of the policy. To ensure that the line managers and other relevant decision makers understand Company policy and their position in law, appropriate training and guidance is provided. Direct or indirect discrimination, including harassment or victimisation is not tolerated. Deliberate failure to observe the requirements of this policy will be subject to disciplinary action through the Company's Disciplinary Procedure.

The Managing Director has specific responsibility for applying this policy and is accountable for its implementation. Any employee who believes that they are being treated unfairly in any way associated with this policy is entitled to raise the matter through the nominated persons.

The Law

The principal legislation relating to Equal Opportunities is:

- The Sex Discrimination Act 1975 and The Sex Discrimination Act 1975 (Amendment) Regulations 2003.
- The Race Relations Act 1976 and The Race Relations Act 1976 (Amendment) Regulations 2003.
- The Equal Pay Act 1970 and The Equal Pay Act 1970 (Amendment) Regulations 2003.
- Disability Discrimination Act 2005
- The Employment Equality (Religion or Belief) Regulations 2003.
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Equality Act 2010

The supervisory bodies listed below were set up under equal opportunities legislation. They were tasked to work towards the elimination of discrimination and the promotion of equal opportunities.

Equal Opportunities Commission.
Commission for Racial Equality.



Disability Rights Commission.

They produce Codes of Practice, which interpret the laws relating to equal opportunity and give practical guidance on how discrimination can be avoided

They have powers to:

- Conduct investigations into alleged discrimination by any person or body.
- Assist individuals to pursue their claims in an Employment Tribunal.
- Advise Companies on the promotion of equal opportunities.

The laws and our Policy relating to equal opportunities are concerned with treating people fairly and without bias. All decisions to do with recruitment, conditions of service, career development and training must be based on suitability without considering an individual's ethnic origin, nationality, sexual orientation, marital status, religious belief, sex or disability.

Unlawful Discrimination

The Race Relations Act, the Sex Discrimination Act, the Disability Discrimination Act, the Employment Equality (Religion or Belief) and (Sexual Orientation) Regulations 2003n) Regulations 2003 make it unlawful to discriminate against a person directly or indirectly in the field of employment.

Direct Discrimination

Consists of treating one person less favourably than others on the grounds of:

- Sex.
- Race.
- Religious belief
- Sexual orientation
- Ethnic origin.
- Disability.

Examples of this would be:

- Refusing to employ any women as engineers or men as secretaries.
- Rejecting job applicants of a particular nationality.
- Paying a particular group of employees (e.g. Members of an ethnic minority) less than others carrying out similar work.
- Refusing employment to someone who is wheelchair bound even when the position is wholly or mainly expected to be an office job.

Indirect Discrimination



This consists of applying a rule, regulation or condition, which, although applied equally to all, means that a considerably smaller proportion of a particular sex, ethnic origin or disability can comply with it.

Examples of this would be:

- A rule about uniforms requiring all receptionists to wear skirts.
- A minimum height requirement for engineers (men are generally taller than women).
- When the company does not undertake to carry out reasonable adjustments to accommodate a disability, e.g. adjustments to premises such as a wheelchair ramp.

It is **unlawful** to:

- **Instruct** another person to discriminate directly or indirectly and to act in response to such instructions. An example of an unlawful instruction is one given by a manager not to employ anyone from a particular sex or racial group, anyone with a disability or anyone who is 'gay'.
- **Put pressure** on another person to discriminate directly or indirectly and to act in response to such pressure. An example of pressure to discriminate unlawfully is an attempt by a group of workers to induce an employer not to recruit someone due to their ethnic origin, nationality, sexual orientation, religious belief, sex or disability by threatening industrial action.
- **Segregate** by making separate arrangements for persons of different racial groups. An example of segregation is if an employer deliberately reserves one shift for a particular race.
- **Victimise** individuals who have made allegations or complaints of ethnic origin, nationality, sexual orientation, religious belief, sex or disability discrimination or provided information about such discrimination. Victimisation would be in the form of disciplinary action or could simply be disadvantaging an individual by giving him or her the least pleasant jobs, depriving him or her of the opportunity for overtime or requiring him or her to work excessive overtime.
- **Harass**, intimidate or otherwise subject others to unfavourable treatment on the grounds of their ethnic origin, nationality, sexual orientation, religious belief, sex or disability.

Examples of harassment include:

Verbal harassment



- Verbal abuse or name calling, statements, remarks or innuendo which intend to ridicule or insult a person on the grounds of their ethnic origin, nationality, sexual orientation, religious belief, sex or disability.
- Jokes of a derogatory nature on the grounds of ethnic origin, nationality, sexual orientation, religious belief, sex or disability.
- The use of threatening or obscene language.
- Making verbal sexual advances.

Physical harassment

- Assault, as in physical attack.
- Actions which are intended to intimidate.
- Actions, which intend ridicule, discomfort or embarrassment on the grounds of ethnic origin, nationality, sexual orientation, religious belief, sex or disability.
- Making sexual advances in a physical manner.

The Responsibilities of All Employees

The following actions by you as employees would be unlawful:

- Discrimination in the course of your employment against fellow employees.
- Inducing, or attempting to induce other employees, unions or management to practise unlawful discrimination. For example, you should not refuse to accept other employees from particular racial groups or refuse to work with a supervisor of a particular racial group.
- Victimising individuals who have made allegations or complaints of discrimination or provided information about such discrimination.
- Harassing other employees because of their ethnic origin, nationality, sexual orientation, marital status, religious belief, sex or disability.

To assist in preventing discrimination and promoting equal opportunity you should:

- Refrain from verbal or physical abuse, harassment or intimidation of others on the grounds of their ethnic origin, nationality, sexual orientation, religious belief, sex or disability.
- Co-operate in measures introduced by management designed to ensure equal opportunity and non-discrimination.
- Draw the attention of management to suspected discriminatory acts or practices.

You are required to maintain acceptable standards of behaviour at work and must not discriminate, whether directly or indirectly, in a way, which contravenes the law or our Equal Opportunity Policy. Failure to observe this requirement will be dealt with in accordance with the **Company Disciplinary Procedure**, which may include summary dismissal for gross breaches of the policy.



If you consider that you have grounds for complaint in relation to the company's Equal Opportunities Policy, including direct or indirect discrimination, harassment, or victimisation you should pursue the matter through the **Grievance Procedure** and raise it firstly with your immediate supervisor. If the complaint is of a sensitive nature and it is not appropriate to raise it in the first instance with your immediate superior, then a direct approach may be made to your Director

The Responsibilities of Managers and Supervisors

The success of the Equal Opportunities Policy depends on managers and supervisors taking responsibility for ensuring that the Policy is implemented.

The following aspects are your responsibility as managers and supervisors:

Harassment

You must ensure that you:

- Maintain appropriate standards of behaviour from yourselves and other employees.
- Recognise and deal with harassment by others.
- Stop language, jokes, abuse or victimisation with racist/sexist connotations, those that would cause offence to those with disabilities and those of making reference to religious belief.

Recruitment

You must not discriminate unlawfully in arrangements, such as selection criteria or tests, for determining who should be offered employment.

All criteria that contribute to the selection decision must be objective and justifiable and must not discriminate either directly or indirectly. It is unlawful to publish an advertisement which indicates, or could reasonably be understood as indicating, an intention to discriminate against applicants on the grounds of ethnic origin, nationality, sexual orientation, marital status, religious belief, sex or disability. The drafting of advertisements must be implemented at Head Office. Only using 'word of mouth' for attracting candidates may unnecessarily restrict the choice of applicants available. All applications should be processed in the same way and you should only shortlist those, which match the selection criteria. The questions you ask at interview should relate to the requirements of the job. You should keep records of your selection criteria and your reasons for rejection, short-listing and selection for at least six months.

You must not discriminate unlawfully in the terms on which employment is offered.



You must not discriminate unlawfully by refusing or deliberately omitting to offer employment.

Promotion and transfer

All criteria that contribute to your decisions for promotion or transfer must be objective, justifiable and must not discriminate either directly or indirectly.

Terms of employment, benefits, facilities and services

For example, terms and conditions of employment should be broadly consistent for all employees doing similar jobs.

Training

The selection criteria you use for access to training opportunities must not discriminate on the grounds of ethnic origin, nationality, sexual orientation, religious belief, sex or disability, either directly or indirectly.

Performance development and career review

You must conduct the annual performance, development and career review in a way that does not discriminate on the grounds of sex, race, disability or any other non-relevant criteria.

You must assess performance consistently and objectively over a period of time against relevant and agreed targets, which are not discriminatory.

Disciplinary procedures

You must not use Disciplinary Procedures to victimise an individual because he or she has complained about discrimination or given evidence about such a complaint, for example, under the provision of the Public Interest Disclosure Act 1998. Any act of direct or indirect discrimination, harassment, victimisation or breach of the company's Equal Opportunities statement will not be tolerated. It will not be regarded as a minor offence and should be dealt with formally under the Disciplinary Procedure.

Grievance procedures

Managers and supervisors are responsible for dealing with grievances as quickly and effectively as possible. You should not ignore or treat grievances lightly or assume that people who are oversensitive make them. All complaints should be fully investigated.



You must not discriminate on the grounds of ethnic origin, nationality, sexual orientation, religious belief, sex or disability, either directly or indirectly, against any individual who pursues a matter, in relation to the company's Equal Opportunities Policy, through the Grievance Procedure. Each grievance must be treated fairly and without bias. All grievances raised under the Equal Opportunity Policy must be reported immediately to your Director.

A handwritten signature in dark blue ink, appearing to read 'Ciaran O'Duffy', is written over a light blue rectangular background.

Ciaran O'Duffy
Managing Director

28.06.24