



EQUAL OPPORTUNITIES POLICY

OF

The PHA Group Limited (PHA)

1 INTRODUCTION

PHA is committed to a comprehensive policy of equal opportunities in employment in which individuals are selected and treated on the basis of their relevant merits and abilities without regard to race, religion or belief, colour, sex, age, national origin, disability or sexual orientation and are given equal opportunities within the company. The aim of this policy is to ensure that no job applicant or employee receives less favourable treatment on grounds not relevant to good employment practice.

2 POLICY STATEMENT

2.1 The policy and practice of the company require that all employees are afforded equal opportunities within employment and that entry into employment with the company and progression within employment will be determined only by personal merit and the application of criteria which are related to the duties of each particular position. In all cases, ability to perform the job will be the primary consideration.

2.2 All employees have a duty to co-operate with this policy to ensure equal opportunities and to prevent discrimination. Employees must not harass or intimidate other employees on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation and must not victimise or retaliate against employees who make such allegations. Disciplinary action will be taken against any employee who breaches this policy and serious breaches will be treated as gross misconduct.

3 CODE OF PRACTICE

The company welcomes diversity amongst its employees and seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual's abilities and qualifications. The recruitment process must result in the selection of the most suitable person for the job having regard to experience and qualifications where necessary. As an employer committed to the principle of equality of opportunity, the company will adhere to the following procedure for recruiting and selecting individuals for all positions:

3.1 SELECTION CRITERIA

The selection process will be carried out consistently for all jobs at all levels. Selection criteria for all positions will be clearly defined and reflected in the further particulars sent to applicants which will also include details of the company's commitment to equality of opportunity. Job qualifications or requirements which would have the effect of inhibiting applications from

members of particular groups, such as those of one sex, persons of a particular religion, marital status or sexual orientation, persons of a particular racial group, persons within a certain age bracket or those with a disability, will not be demanded or imposed except where they are justifiable in terms of the job to be done.

3.2 ADVERTISING

Job advertisements will be widely publicised so as to encourage applications from all suitably qualified and experienced people. In order to attract applications from all sections of the community, the company will endeavour to ensure that advertisements are not restricted to areas or publications which would exclude or disproportionately reduce applications from a particular gender, religion, age group or racial group and should avoid prescribing requirements as to marital status or age. All job advertisements placed on behalf of the company will state the company's commitment to equality of opportunity.

3.3 SELECTION METHODS

The selection process will be carried out consistently for all jobs at all levels. All those handling applications and conducting interviews must be aware of the principles of the Sex Discrimination Act, the Race Relations Act, the Disability Discrimination Act, the Employment Equality (Age) Regulations, the Employment Equality (Religion or Belief) Regulations, the Equality Act and other relevant legislation. The selection of new employees will be based on job requirements and the individual's suitability and ability to do the job and information sought from candidates will relate only to the qualifications for or requirements of the job.

3.4 INTERVIEWS

The staff responsible for shortlisting, interviewing and making or recommending an appointment will be clearly informed of the selection criteria and the need for consistency. Wherever possible, at least two people will interview applicants and all questions will relate to the selection criteria. No questions will be based on age, assumptions about roles in the home and the family or the assumed suitability of different ethnic groups for the post in question. Where it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves irregular hours or extensive travel) this will be discussed objectively and will be asked equally of all candidates. In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (such as accessible interview rooms or the assistance of a sign interpreter) should be offered to enable candidates to compete on an equal basis.

4 PROMOTION

When considering candidates for promotion general ability will be the main requirement and no employee will be discriminated against on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation.

5 GRIEVANCE PROCEDURES

All allegations of discrimination on the grounds of race, religion or belief, colour, sex, age, national origin, disability or sexual orientation will be dealt with seriously and confidentially.

6 RECORD KEEPING

Details of candidates and of selection decisions (including the rationale for selection or rejection) will be kept for at least six months after an appointment has been made in case they are required as evidence by an employment tribunal or for other proceedings. The company will keep records of the sex, ethnic group, age and any disability of its employees and of all candidates and of those shortlisted and appointed. Records may be used to determine whether members of one sex or persons of a certain racial group, religion or age bracket or those with a disability do not apply for employment or apply in smaller numbers than might be expected or are shortlisted or appointed in a lower proportion than their application rate or are concentrated in certain jobs. The company will investigate the practicalities of monitoring progression within employment, including access to training and development, promotion and grading.

7 REVIEW OF RECRUITMENT PRACTICE

Recruitment procedures and practices will be kept under review so as to ensure that this policy is being adhered to and to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful discrimination.