

12. EQUALITY AND DIVERSITY

12.1 Background

The Company is an equal opportunity employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful discrimination on the grounds of colour, race, nationality, ethnic or national origin, religion, sex (including gender reassignment), sexual orientation, age, marital status or disability.

We aim to ensure that our staff achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We are committed to ensuring that all our staff and applicants for employment are protected from unlawful discrimination in employment. We have adopted the following equal opportunity policy as a means of helping to achieve these aims.

12.2 What is Discrimination?

Direct Discrimination

Direct discrimination occurs when someone is put at a disadvantage on discriminatory grounds in relation to his or her employment. Direct discrimination may occur even when unintentional.

Indirect Discrimination

Indirect discrimination occurs where an individual's employment is subject to an unjustified condition which a particular group may find more difficult to meet although on the face of it the condition or requirement is 'neutral'.

Disability Discrimination

This form of discrimination occurs where an individual is unjustifiably disadvantaged in employment/recruitment for a reason connected with his/her disability unless the discrimination cannot be avoided by making reasonable adjustments.

Victimisation

Victimisation occurs where an individual is treated less favourably than colleagues because he/she has taken action to assert their statutory rights or assisted a colleague with information in that regard.

12.3 Implementing Equality of Opportunity

Recruitment and employment decisions will be made on the basis of fair and objective criteria. Our selection procedures are reviewed from time to time to ensure that they are appropriate for achieving our objectives and for avoiding unlawful discrimination.

The requirements of job applicants and existing members of staff who have or have had a disability will be reviewed to ensure that whatever possible reasonable adjustments are made to enable them to enter into or remain in employment with us. Promotion opportunities, benefits and facilities of employment will not be unreasonably limited and every reasonable effort will be made to ensure that disabled staff participate fully in the workplace.

Person and job specifications will be limited to those requirements which are necessary for the effective performance of the job. Interviews will be conducted on an objective basis and personal or home commitments will not form the basis of employment decisions except where necessary.

Appropriate training will be provided to enable staff to implement and uphold our commitment to equality of opportunity.

Everybody within the Company must remember that attitudes, opinions and beliefs will vary considerably from person to person. So, a joke, a comment, or a particular point of view which is completely acceptable to you may be repellent to someone else. Therefore, please do your utmost to ensure that you do not offend your work colleagues and that you encourage your workmates to behave in a similar way.

If the Company receives a complaint or it identifies that an employee of STARLAB (UK) may have been involved with some form of discriminatory behaviour then a full and thorough investigation will be undertaken. If discrimination is proven, disciplinary action, up to and including summary dismissal, will be taken against the relevant employees. It is likely also that other initiatives will be undertaken (for example, retraining) in order to promote equality and diversity.

If you see or hear anything that suggests that discriminatory practices are being used within the business, you should discuss the matter with your Manager who will take appropriate action. If you feel that the matter has been ignored or, indeed, the issue concerns your Manager directly, then you should invoke the Company's grievance procedure. We can assure you that the Company will offer you every support and protection. Indeed, any form of action against an employee who has reported any form of suspected discrimination will be treated as a dismissible offence in itself.

13. HARASSMENT

13.1 Policy Statement

STARLAB (UK) has a total commitment to ensuring the elimination of all harassment and bullying from the workplace. All members of our team must be free to perform their duties without being subjected to harassment by a colleague, manager or director. Any unwanted behaviour, whether physical or verbal, which is offensive, humiliating and viewed as unacceptable to the victim will be fully investigated and, where necessary, appropriate disciplinary action taken.

13.2 Definition of Sexual Harassment

Sexual harassment on men or women is defined as "unwanted conduct of a sexual nature or other conduct based on sex affecting the dignity of women and men at work"

13.3 Definition of Harassment

Harassment as determined by the Company would fall under the following categories:

- Exerting continuous undue pressure or unreasonable demands.
- Bullying in its many forms i.e. any kind of behaviour falling under the heading of: Mocking, Deriding, Insulting, Embarrassing, Belittling etc.

13.4 Complaint Procedure

- The person who feels he/she is being sexually harassed / harassed should try to deal informally with the matter stating that the behaviour is unwelcome.
- If this is not successful the complainant should record the dates, times and nature of the incidents and bring it to the attention of their immediate Manager.
- If this is an inappropriate remedy, the complainant should bring the complaint to a higher level of management.
- The complaint will be discussed with the complainant confidentially with due privacy and sensitivity.
- The complainant and the accused party will be interviewed separately and detailed statements taken. The alleged harasser will be made aware of the nature of the complaint and will be given the opportunity to respond to the allegations.
- If it is necessary to interview witnesses the importance of confidentiality will be stressed.
- If, following a thorough investigation, the employer concludes that there has been sexual harassment or any other form of harassment then appropriate action will be taken under the disciplinary procedure. This may range from a verbal warning right through to summary dismissal.
- Adequate records, signed statement of all relevant discussions will be maintained

Any retaliation against an employee because he or she has complained about sexual harassment or harassment is a disciplinary offence in itself.

14. EQUAL PAY POLICY

The Company is committed to the principle of equal pay for men and women. In this context 'pay' includes not only remuneration but also other benefits of the employment such as promotion and training opportunities and access to facilities provided within the employment package from time to time.

We are committed to introducing and maintaining pay systems which are transparent, based on objective criteria and free from sex bias.

Women and men employed by us are entitled to equal pay if they are undertaking work which is substantially similar or is of equal value to the organisation unless there are specific and clear reasons unconnected with their sex which explain and justify any differential in pay. In some cases individuals carrying out similar work may receive different salaries because of seniority, incremental points, qualifications and other such factors.

Staff are able to raise any query or grievance concerning their pay and its evaluation through the grievance procedure.

Our pay policies and practices will be reviewed on a regular basis and particular attention will be paid to employees who may be in non-standard employment, in jobs where one or other gender predominates or who are absent on pregnancy and maternity leave.

Managers who are responsible for setting performance-related pay rates through the appraisal system [or other similar mechanism] will receive specific training to ensure as far as possible that they understand and apply the equal pay principle in approaching their task.

Taken from STARLAB Company Employment Handbook

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