

EQUAL OPPORTUNITIES POLICY

Siccar Point Energy Limited ("the Employer")

Purpose

The Employer believes that the pursuit of equal opportunity for all in the workplace is based on sound moral and business grounds. The Employer is committed to employing the best people and creating an atmosphere in which people can achieve their potential. One way of achieving this is to treat all employees or potential employees fairly.

Compliance with this policy should assist the Employer to put this commitment into practice, and also ensure that employees do not commit unlawful acts of discrimination.

The Employer operates a policy of providing equal opportunities in recruitment, training and promotion whatever the colour, race, religion or belief, ethnic or national origin, sex, sexual orientation, gender, marital status, age or disability of an employee, having regard to the individual's aptitudes and abilities and the requirements of the job. The Employer is opposed to all forms of unlawful and unfair discrimination in employment and against customers/contacts/suppliers.

The Employer is committed to the promotion of equal opportunities and to ensure that the human resources, talent and skills of all employees are maximised. The Employer's policy is to treat all employees with respect and dignity and to ensure that decisions are taken without reference to irrelevant or discriminatory criteria.

The Employer will take every possible step to ensure that decisions on recruitment, selection, training, conditions of work, pay and benefits, promotion, career, management and every other aspect of employment are justifiable and based solely on objective criteria.

There may be circumstances where the Employer has a legal duty to ensure that a job holder is of a specified gender or where health and safety requirements apply. In these instances, the Employer will follow the provisions in the legislation.

The Employer will ensure that the policy is communicated to all employees and made known to job applicants.

This policy does not form part of the contract of employment and the Employer may amend it at any time.

Making the Policy Work

The Board of Directors has overall responsibility for the effective operation of the Employer's Equal Opportunities policy and for ensuring compliance with the anti-discrimination laws.

Managers and supervisors have particular responsibility for the practical application of this policy and for ensuring a harmonious working environment. They should endeavour to address and eliminate any situation involving bullying, harassment or any other forms of discrimination (with support from Human Resources). The Employer undertakes to provide the necessary support and training which will include awareness of discrimination legislation and its impact on decisions they make.

Each employee has personal responsibility for the practical application of this policy and to ensure that the Employer achieves its equality objectives. The successful implementation of this policy depends on everyone treating each other with the respect and dignity they would rightly expect from others.

What the Law says

The Employer recognises its obligations under the Equality Act 2010. The Employer is committed to ensuring that no individual is discriminated against on the grounds of sex, sexual orientation, marriage and civil partnership, pregnancy and maternity, age, gender reassignment, race, disability, sexual orientation or religion or belief. These are known as “protected characteristics”.

What is discrimination?

Discrimination can be direct or indirect and it can occur intentionally or unintentionally.

Direct discrimination: occurs where the individual is treated less favourably than others because of a protected characteristic. For example, paying someone less because of their sex or rejecting an application for employment because someone is disabled. Direct discrimination can occur even where it is unintentional.

Association and Perception: direct discrimination can also occur if a person is discriminated against because of the protected characteristic of another person, for example an employee with a disabled child being subject to unpleasant comments about disabled people. Or discrimination can arise where the person doesn't actually have the protected characteristic, but they are perceived as having it, and they are discriminated for that. For example, a job application of a white woman is rejected because the employer wrongly assumes she is Asian because she has an Asian name.

Indirect Discrimination: recognises that some practices which appear to treat people equally can nevertheless adversely affect a particular group (with a protected characteristic) more than others. Where this is the case, the practice will be unlawful unless it can be objectively justified. For example, scheduling all training sessions for a Saturday morning, although applied to everyone, may adversely affect employees of a particular religion.

Discrimination also includes victimisation and harassment.

Victimisation: occurs where an individual is treated less favourably than others because they have made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are thought to have done so. For example, a female employee who had brought an equal pay claim being overlooked for a promotion because she had brought the claim.

Harassment: is unwanted conduct which has the effect or purpose of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity, which relates to a person's protected characteristic. More information on this is included in the Employer's Anti-Harassment and Bullying Policy.

Disability issues

The Employer is committed to ensuring that disabled people, including job applicants and employees, are not treated less favourably or disadvantaged by comparison to people who are not disabled in relation to their work or working environment.

If the employee is disabled, or becomes disabled in the course of their employment with the Employer, the employee is encouraged to tell the Employer about their condition. This will enable the Employer to support the employee as much as possible, and to make reasonable adjustments where appropriate. The employee may also wish to inform their line manager of any reasonable adjustment to their working conditions or duties of their job which they consider to be necessary, or which would assist the employee in the performance of their duties. The Employer will consider such proposals carefully and will accommodate these, where possible and proportionate to the needs of the employee's job.

Recruitment and Selection

The Employer's recruitment process will result in the selection of the most suitable person for the job in respect of experience and qualifications. The Employer will ensure that individuals are recruited and selected on objective criteria having regard to their relevant aptitudes, potential, skills and abilities. In particular, no applicant will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job or which constitute discrimination.

Implementing equality and diversity

The Employer states its wholehearted support for the principles and practices of equal opportunities and will actively promote equal opportunities throughout the Employer's organisation. In support of equality and diversity in the workplace, the following activities regularly take place within the Employer:

- the provision of opportunity between women and men will be monitored through the collection and analysis of statistical data on the sex, marital status and family status of all full time and part time employees and job applicants;
- the Employer will provide suitable and relevant equal opportunity training as necessary for all staff, including line supervisors and managers to enable staff to implement and uphold the Employer's commitment to equality of opportunity;
- the Employer provides standard benefit packages for each grade of staff, regardless of protected characteristics. Remuneration is determined by reference to grade, position and performance;
- the Employer has developed a range of policies designed to help parents combine work and family life. Within these policies, the following elements are covered:
 - Maternity
 - Paternity
 - Shared Parental Leave
 - Parental Leave

Harassment / Dignity at work

The Employer recognises the problems that sexual, racial and other forms of harassment may cause at work and is committed to ensure that such unacceptable behaviour does not take place. All forms of harassment are abhorrent and will not be tolerated by the Employer.

The Employer has a separate policy on Anti-Harassment and Bullying.

Grievance and Disciplinary Procedures

The Employer can only act to prevent individuals from breaking the Employer's policy if it knows about the conduct. If the employee believes they have experienced discrimination, harassment or victimisation in any form the employee can raise the matter informally with their manager or with a member of HR. The employee can also raise the matter formally through the Employer's Grievance Procedure or the complaint's procedure in the Employer's Anti- Harassment and Bullying Policy. All complaints will be dealt with seriously, properly and confidentially and every effort will be made to secure a satisfactory resolution.

Approved by Jonathan Roger, Chief Executive Officer
1 May, 2017