

## Equal Opportunities Statement

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Bolt & Heeks Limited is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

Bolt & Heeks Limited will follow the recommendations of the Equality & Human Rights Commission and any Statutory Codes of Practice in all their employment policies, procedures and practices.

## Equal Opportunity Policy

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The aims of this policy are to ensure that:

- No-one receives less favourable treatment on grounds race, colour, nationality, ethnic or national origins, gender, sexual orientation, religion or belief, disability or age; or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds; or victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age, and of any sexual orientation, religion or belief.

- Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

- The policy will be a priority for the organisation.
- The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet and website.
- Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies
- All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation.
- Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
- Complaints about discrimination or harassment in the course of employment will be regarded seriously and may result in disciplinary sanctions, and even dismissal. The complaints procedure will be published in a form that is easily accessible.
- Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age, religion or belief.

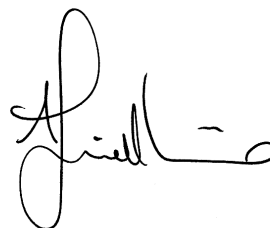
- All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation.
- Selection criteria will be entirely related to the job or training opportunity.
- We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
- We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or the employee.
- Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment, promotion and training will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity. Information about the religion/belief and sexual orientation of employees may also be monitored.
- If the data shows that people from particular groups are under-represented in particular areas of work, lawful positive action, training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.
- Grievances, disciplinary action, performance assessment and terminations of employment, for whatever reason, will also be monitored by gender, racial group, age, disability, religion/belief and sexual orientation.
- Requirements, conditions, provisions, criteria and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, unlawfully discriminate on any of the above grounds.
- All contracts between Bolt & Heeks Limited and contractors to supply goods, materials or services will include a clause prohibiting unlawful discrimination or harassment by contractors and their staff, and by any subcontractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
- The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the website, the staff newsletter, notice boards, and the annual report.
- Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, religion/belief, disability or age.
- The company will draw up an Action Plan detailing how this policy will be implemented in practice.

This policy has been endorsed by Alan Williams and has the full support of the Board of Directors.

The policy was approved on 1st December 2008 following consultation with senior managers, workers, workers' representatives and trade unions.

Overall responsibility for the effectiveness of the policy lies with Alan Williams, Joint Managing Director.

**Signed:**



**Alan Williams**  
**Joint Managing Director**  
**Date: April 2009**