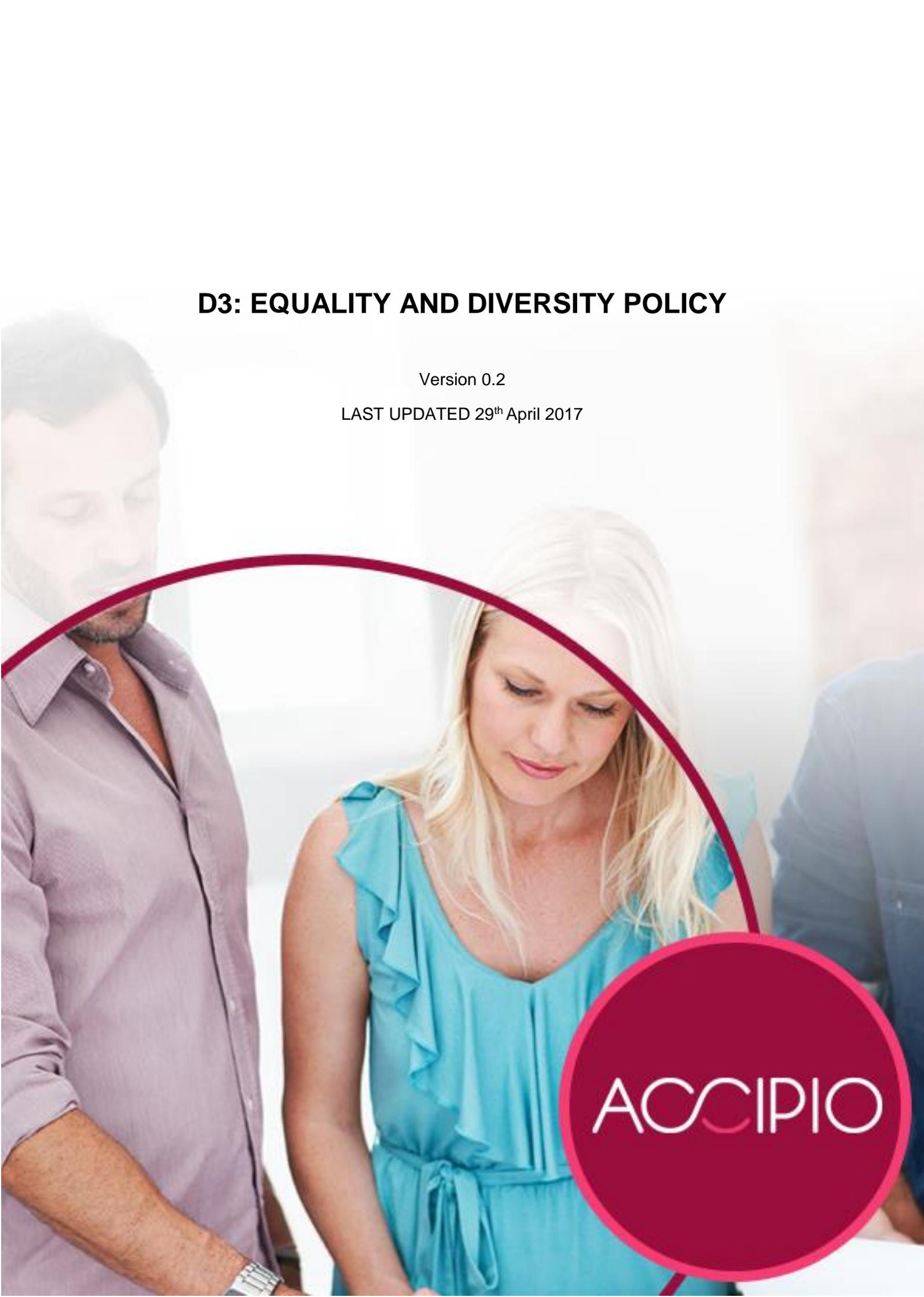


D3: EQUALITY AND DIVERSITY POLICY

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ACCIPIO



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1. POLICY STATEMENT

Accipio is committed to combating discrimination and encourages diversity amongst our workforce. Our aim is that our workforce will be representative of society and that each Employee feels respected and able to give of their best.

To that end the purpose of this policy is to set out a framework towards equality and fairness for all in our employment. Accipio will not discriminate against any individual on grounds of gender, pregnancy, gender reassignment, marital or civil partner status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion, belief or age (the "Prohibited Grounds"). Accipio opposes all forms of unlawful and unfair discrimination against any employee, former employee, visitor, client, customer or supplier.

All Employees, whether part-time, full time, temporary or permanent, will be treated fairly and with respect. Selection for employment, terms and conditions of employment, opportunities for promotion, appraisals, training or any other benefit will be based solely on merit, aptitude and ability. All Employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

Accipio also opposes all forms of discrimination in the provision of goods, facilities or services to customers.

2. ACCIPIO'S COMMITMENT

To create an environment in which the contributions of all our staff are recognised and valued.

Every Employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment whether by employees, suppliers or customers of Accipio will be tolerated.

Training, development and progression opportunities are available to all staff.

Equality in the workplace is good management practice and makes sound business sense.

Accipio will periodically review all our employment practices and procedures to ensure fairness and equality.

3. TYPES OF DISCRIMINATION

Discrimination can take different forms; it may be direct or indirect and occur intentionally or unintentionally.

Direct Discrimination

Direct discrimination occurs where a person treats another less favourably for a reason/s related to one or more of the Prohibited Grounds. For example, a woman is denied a promotion because she is pregnant.

Indirect discrimination

Indirect discrimination takes place where an unjustified provision, criterion or practice is applied which has a disproportionate adverse impact on people, e.g. of a particular sex, and it cannot be objectively justified and which is to an employee's detriment who belongs to that particular sex. For example, requiring all employees to work full time could amount to indirect discrimination against women, if the requirement cannot be justified for a reason unconnected to gender, as proportionately fewer women will be able to meet this requirement compared to the proportion of men.

Harassment

Harassment happens where someone engages in unwanted conduct, based on one of the Prohibited Grounds, which has the purpose or effect of violating someone else's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, even if this was not the intention of the perpetrator. Harassment may include offensive jokes, personal insults, persistent criticism, unwanted physical conduct or "freezing" someone out.

Victimisation

Victimisation occurs where someone is treated less favourably because they have raised a discrimination complaint, or assisted someone else in doing so. For example, refusing to provide a reference for a former employee who made an age discrimination claim.

Disability Discrimination – Failure to make reasonable adjustments

Where an Employee is disabled, Accipio is required to make reasonable adjustments to the premises or employment arrangements (e.g. work station, hours of work, duties etc) where such premises or arrangements put a disabled employee at a substantial disadvantage. If Accipio fails to do so, this could amount to disability discrimination.

4. RECRUITMENT AND SELECTION

Accipio recognises the benefits of having a diverse workforce and will take steps to ensure that:

- (a) It endeavours to recruit from the widest possible pool of qualified candidates;
- (b) Employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- (c) Where appropriate, positive action measures are taken to attract applications from all sections of society;
- (d) Selection criteria and processes do not discriminate on any of the Prohibited Grounds;
- (e) All recruitment agencies acting for Accipio will be made aware of its requirement not to discriminate and to act accordingly.



5. EMPLOYMENT AND TRAINING

Accipio will treat all Employees and job applicants equally and fairly and not discriminate against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, health and safety, work allocation and any other employment related activities.

6. PROMOTING EQUALITY AND DIVERSITY

Accipio is committed to promoting equality and diversity in Accipio. All Employees at every level will be informed of this policy and will be provided with equality and diversity training appropriate to their needs and responsibilities. All those who act on Accipio's behalf will be expected to pay due regard to the policy when conducting business on our behalf, and should be informed of this policy if appropriate. In all its dealings, including those with suppliers, contractors and recruitment agencies, Accipio will seek to promote the principles of equality and diversity. Accipio will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities.

7. COMPLAINTS OF DISCRIMINATION

If an Employee wishes to raise a complaint of discrimination or harassment, please refer to Accipio's Grievance Procedure which is available from [*insert details*]. Accipio will investigate all complaints of discrimination or harassment made by Employees, customers or other third parties and will take disciplinary action wherever appropriate. The complainant will be informed of the outcome of those investigations.

8. IMPLEMENTATION

All Employees should carefully familiarise themselves with this policy and act in accordance with its terms at all times.

Accipio will not tolerate discrimination or harassment of any kind. Breaches of this policy will lead to disciplinary action and could amount to gross misconduct justifying summary dismissal. Please refer to the Disciplinary Policy.

9. REVIEW AND MONITORING

The Directors have overall responsibility for the effective operation of this policy and will review it on a regular basis, and keep it updated to reflect changes in the law.

Accipio will monitor the ethnicity, gender and number of people with disabilities within the existing workforce and the pool of job applicants. This policy will be amended in light of this information, and Accipio will take all necessary steps to eliminate any unlawful discrimination.

Information provided by employees and job applicants for monitoring purposes will be processed in accordance with the Data Protection Act 1998.

This policy is non-contractual, and does not form part of an employee's terms and conditions of employment. Accipio reserves the right to amend or replace it at its absolute discretion.