

SIMPSON (YORK) LTD

EQUAL OPPORTUNITIES, DIVERSITY AND EQUALITY POLICY

STATEMENT OF COMMITMENT

The aim of this policy is to ensure that all existing and potential employees receive equal opportunities and treatment to all nationalities and ethnic backgrounds and that all are given equal help to attain their potential for the benefit of both themselves and the Company

The Company values everyone's contribution and will treat people with respect and integrity, and endeavour to ensure their ongoing development.

No employee or job application will be less favourably treated than another on the grounds of their sexual orientation, marital or parental status, race, nationality, creed, ethnic or national origin, colour, religious belief, disability, age or political belief. The Company fully supports the principle of equal opportunities and diversity, and will make every effort to ensure that individuals are treated accordingly.

We are committed to treating people in a fair and equal manner, as part of everyday operations, and as part of their development, and because we value their contribution to our business activity.

We endeavour to continuously audit, review and improve our systems and services, and consult and communicate with all of our team, and when appropriate, respond to feedback or non performance.

We endeavour to comply with all relevant legislation and requirements, through the sharing of knowledge and understanding, with responsive, fair and flexible practices that are fully understood along with respective roles and responsibilities, applied to all our activities.

Aim

The Company aims to ensure that all existing and potential employees receive an equality of opportunities, treatment and support to all nationalities and ethnic backgrounds, and endeavours to constantly review and improve its systems. Where appropriate, additional support services, e.g. translation will be provided.

We will take action, to if necessary, identify and eliminate any discriminatory practices, in any form or manner, which could act as a barrier to achieving these aims.

We will endeavour to employ, develop and train local people to make a sustainable, positive difference to the community on a project by project basis.

IMPLEMENTATION

Responsibility

The Company through its Directors, Managers and Supervisors will be responsible for promoting this policy and for its regular review and day to day implementation.

All employees have responsibility to observe this policy. In addition Managers at all levels have respective particular responsibility for ensuring the policy is fairly and consistently applied in all areas under their control.

Conduct or actions by employees that go against the ethos or letter of the policy could constitute gross misconduct which will be liable to disciplinary action which could in some circumstances include summary dismissal.

Whilst the following examples of such action are illustrative they are not seen as exhaustive.

- Discrimination against applicants or employees on the grounds established within the Equal Opportunities Policy.
- Attempting or inducing employees or managers to practice unlawful discrimination.
- Indulging in verbal or physical harassment of a nature which is known, or should be known, to be offensive to the victim.
- Victimisation to individuals who have made allegations or complaints of discrimination or harassment or provided information about such discrimination or harassment.

The Company aims to ensure that all existing and prospective employees are treated with respect and dignity and that diversity is recognised and valued.

The Company will communicate the SIMPSON Equal Opportunities and Equality Policy to its suppliers and subcontractors and expect and review that their similar policies reflect or are of equal status.

In employment terms the aims of the policy statement will be considered at all times. Recruitment, selection, training, development and promotion will be based on merit and performance.

Our Managers are responsible for making sure that no employee or job applicant receives any less favourable treatment or is placed at a disadvantage by conditions that are either directly or indirectly discriminatory.

In terms of recruitment for respective job roles our systems ensure that they avoid any bias in respect of race, sex, marital status, disability, religion, belief, sexual, orientation or age.

Responsibility (continued)

In considering prospective job applicants a standard format of information will be requested in order to ensure that a consistent information base is available for equality of interview of prospective personnel for shortlist.

Our system sets out the standard format for interviewing and includes similar questions for all applicants. The interview process allows for the standard assessment of the strengths and potential weaknesses of each candidate. Unsuccessful applicants information relating to this will be retained for a maximum period of three months and then destroyed. As regards successful applicants the interview notes would be retained in the respective personnel file.

Communication

In support of the implementation, operation of our Equal Opportunities and Equalities Policy the Company provides information to help employees understand their position and responsibilities under the Companies policy's. In doing so the Company will comply with all relevant legislation and codes of practice. The Company on a regular basis develop and train our employees to help them recognise equality issues and further understand their respective role and responsibilities in achieving a culture of equality.

The Company will endeavour to integrate equality into all of its day to day management processes so it becomes a natural part of our operations.

Monitoring

The Company will on a regular basis review, monitor and audit its policy principles and operation. If not on a more regular basis this will be done at least annually.

Grievance and Disciplinary procedure

Grievances or complaints on matters covered by this policy will be dealt with in accordance with the SIMPSON complaints and grievance procedure.

If any instances occur where it is determined that an individual has acted in a discriminatory manner, then this could lead to disciplinary action which in turn could lead to summary dismissal.

Signed:

A handwritten signature in blue ink, appearing to read 'RC Gatenby', written over a dotted line.

RC GATENBY
CHAIRMAN & CHIEF EXECUTIVE

Re-issued: 9 November 2010