

## 1. EQUAL OPPORTUNITIES POLICY (NON-CONTRACTUAL)

The Roe Group, incorporating Roe Bros & Co Ltd, North West Steel Ltd, all subsidiaries and affiliated companies are committed to eliminating discrimination and encouraging diversity among its workforce. Our aim is that each employee feels respected and able to give their best.

It is the continuing policy of the Company to provide equal opportunity employment to all employees without regard to the actual or perceived protected characteristics referenced below. The Roe Group is committed to treating all employees fairly and as such no employee will be treated less favourably due to their association with someone who has a protected characteristic.

### *Protected Characteristics*

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership (applies only to someone who actually personally has this characteristic)
- Pregnancy and Maternity
- Race (including ethnic origin, colour, citizenship, nationality and national origin)
- Religion or belief
- Sex
- Sexual Orientation

People will be judged solely on merit and ability during recruitment, selection, training, development and promotion throughout their employment.

### **Fair treatment**

All employees whether full-time, part-time or temporary, will be treated fairly and with respect. This policy applies to all employment decisions, including those in connection with:

- Recruitment, selection, promotion and advertisement of jobs;
- Terms and conditions of employment;
- Training, career development and progression;
- Grievance and disciplinary procedures;
- Relationships between members of staff.

## **Positive Action**

The Roe Group may elect to utilise positive action where permitted by legislation. Positive action is action an employer takes to achieve greater equality in its workforce.

### *General Positive Action*

General positive action may be taken to provide appropriate conditions and facilities to meet the special needs of disadvantaged or underrepresented groups or to enable or encourage participation. This could include such action as mentoring to non-English speaking employees.

General positive action may be taken where:

- The Company reasonably thinks that where persons share a protected characteristic those persons suffer a disadvantage connected to that characteristic; or
- They have needs that are different from the needs of those that do not share that characteristic; or
- Where there is disproportionately low participation in an activity by persons who share a protected characteristic.

The Roe Group will only elect to utilise positive action where it is deemed appropriate as a proportionate means of achieving a legitimate aim. Any action taken will be in accordance with legislation.

## **Promotion of equal opportunities and observance of the policy**

Each employee of the Roe Group has an obligation to promote an equal opportunity environment within the Company. As employees, you have a duty to observe and apply this policy at all times. In particular you must not:

- Discriminate against Managers, colleagues, other employees or job applicants;
- Harass Managers, colleagues, other employees or job applicants;
- Induce, or attempt to induce, other employees to practise unlawful discrimination;
- Victimise individuals who have made allegations or complaints of discrimination or provide information about such discrimination.

The Company's HR department, with the assistance and co-operation of senior management and employees, will take steps to ensure compliance with this policy. This will include regular reviews of quality issues and monitoring activities and complaints.

### **Enquiries about disability and health during recruitment**

As an equal opportunities employer the Roe Group will not ask about the health of an applicant (including whether they are disabled) prior to either offering work to the applicant or prior to including the applicant in a pool of applicants from which we intend to select a person to whom to offer work, unless an exemption applies.

The only circumstances in which the Company may make pre-employment health enquiries are:

- To establish whether the Company has a duty to make a reasonable adjustment in respect of an interview/assessment process;
- To establish whether the applicant will be able to carry out a function that is intrinsic to the work concerned;
- Monitoring diversity of applicants;
- Positive action in employment for disabled people;
- Where having a particular disability is a requirement of the role;
- National security vetting.

To ensure effective operation of this policy and for no other purpose, the Roe Group may keep a record of any employee's and job applicant's protected characteristics. From time to time it may seek the co-operation of employees in updating these records.

# R THE ROE GROUP

---

Where necessary, employees will be able to check / correct their own records of these details. Otherwise, access to this information will be strictly restricted in accordance with statutory requirements

The Roe Group aims to resolve any complaints in accordance with its grievance procedure, as set out in the relevant pages of the Company Handbook. All complaints will be treated seriously and confidentially.

If you feel that you have been treated in a manner that is not in accordance with this policy, please initially raise the matter with your immediate Manager / Depot Manager. If there is a good reason as to why you are unable to raise this matter initially with your Manager / Depot Manager please contact the HR department in relation to your complaint.

As employees of the Roe Group, you have a duty to observe and apply this policy at all times. Any failure to comply with the requirements outlined in this Policy may not only lead to disciplinary action and ultimately your dismissal if the contravention is considered gross misconduct under the Company disciplinary procedure, but could also leave you personally liable to pay up to 100% of any compensation awarded by a tribunal.