

Equal Opportunities Policy

1. Purpose:

The aim of this policy is to ensure that recruitment, development and promotion of employees is based solely on their suitability for the work to be done. No job applicant or employee will receive less favourable treatment because of his/her sex, or gender (including gender reassignment) sexual orientation, marital or family status, age, ethnic origin, disability, race, colour, nationality, national origin, creed, political affiliation, religious belief, part-time status, or any other condition, unless it can be shown to be legally justifiable.

Selection criteria and procedures will be frequently reviewed to ensure that individuals are selected, promoted and treated on the basis of their relevant merits and abilities. All employees will be given equal opportunity and where appropriate training to progress within the Group. This policy is non contractual and does not form part of an employee's contract of employment.

2. Policy Statement:

The Amlin Group is committed to equality of opportunity in all its employment practices, policies and procedures and to ensuring that all employees and job applicants are protected from unlawful discrimination in employment. (Appendix A details examples on 'What is Discrimination'). This policy has also been designed to comply with the equal opportunities legislation.

3. Person and Job Specifications:

Person and job specifications will be limited to those requirements which are necessary for the effective performance of the job.

4. Advertisements:

Vacancies will be advertised internally in order to provide an equal opportunity for any interested employees to apply. All external recruitment will be conducted according to the recruitment policy. Applications will be encouraged from all suitably qualified individuals and, where appropriate, particular emphasis will be placed upon encouraging applications from those who may be currently under represented in the workforce.

5. Recruitment, Transfers and Promotions:

To monitor the equal opportunities process with regard to recruitment, all candidates will be asked to provide personal data relating to ethnic origin, gender, disability and age. This data will not be used as selection criteria but will be utilised for monitoring

purposes and stored in accordance with the Data Protection Act. Additionally, new recruits will be asked to complete a biodata form which will be held confidentially by the Human Resources Department.

The data gathered will be used only for the purposes of monitoring the effectiveness of the Amlin Group's equal opportunity policy, will not be used for the purposes of any employment decision relating to a particular individual and will be stored entirely separately from personnel and other records and in compliance with the requirements of the Data Protection Act 1998.

All those involved in recruitment for the Company will have the appropriate interviewing skills and an awareness of equal opportunities issues. Prior to the selection process beginning, managers will examine all selection criteria to ensure that they are related to the job requirement and are not unlawfully discriminatory. A member of the Human Resources Department will be involved in all selection processes. (This policy should be read in conjunction with the Recruitment Policy).

6. Training and Development:

Appropriate training will be provided to enable employees to implement and uphold our commitment to equality of opportunity.

All employees will be given equal opportunity to progress within the company. An active programme of training and access to training will be made available on the basis of fair and objective criteria.

7. Redundancy and Redeployment:

With reference to the appropriate policies any selection for or process relating to redundancy and redeployment must be conducted in a manner which avoids any unlawful discrimination.

8. Employment of Disabled People:

The Company supports the principle of equal opportunities in employment and opposes all forms of unlawful discrimination on the grounds of disability. The requirements of job applicants and employees who have had a disability will be reviewed to ensure that wherever possible, reasonable adjustments are made to enable them to enter into or remain in employment. Every reasonable effort will be made to ensure that disabled employees participate fully in the workplace.

The Company will not treat disabled people less favourably than others and will make reasonable adjustments to accommodate disabled people.

9. Responsibilities of Individual Employees:

Whilst the overall responsibility for ensuring that there is no unlawful discrimination in the workplace rests mainly with the Company, all employees have certain responsibilities. In particular, individual employees should;

- Cooperate with measures introduced to ensure equal opportunity and non-discrimination
- Treat all colleagues in a fair and non-discriminatory way, respecting cultural differences
- Avoid themselves discriminating e.g. as managers or as persons responsible for selection decisions in recruitment, promotion, transfer, training etc
- Avoid inducing or attempting to induce other employees to practice unlawful discrimination
- Not victimise or attempt to victimise individuals on the grounds that they have made complaints or have provided information on discrimination
- Not harass, or abuse or intimidate other employees
- Inform management if they feel that any form of discrimination has taken place whether they, or another employee is the victim

Any breach by an individual employee of his/her responsibilities under the equal opportunities policy will be dealt with through the disciplinary procedure. Serious offences, such as harassment, may be dealt with as gross misconduct.

10. Employee Protection:

The Company is committed to ensuring that any person who brings a complaint or grievance in good faith under this policy will not be subject to victimisation or to any consequential detrimental treatment whatsoever.

11. Grievances:

Any employee who has a concern regarding the application of this policy should make use of the Company's grievance procedure.

Any prospective employee may request a copy of this policy and submit any grievance, which must be in writing, to the Group Human Resources Department within 14 days of any alleged incident. An investigation will then be conducted and the individual will receive a written report as to the outcome.

12. Responsibility:

All those persons referred to within the scope of this policy are required to be familiar with the terms of this policy.

Individual managers are required to keep within the spirit and intent of the policy, as far as possible and in their own area. Any queries on the application or interpretation

of this policy must be discussed with the Group Human Resources Department prior to any action being taken.

The Group Human Resources Department has the responsibility for ensuring the maintenance, regular review and updating of this policy.

Appendix A - What is Discrimination

Direct discrimination occurs when someone is put at a disadvantage on discriminatory grounds in relation to their employment. Direct discrimination may occur even when unintentional.

Examples:

- A woman with young children fails to obtain a job because it is feared that she might be an unreliable employee
- A minority race applicant for a senior post is not appointed because they might not fit in with the existing (all white) team
- A person is subject to sexual innuendo or other offensive conduct of a sexual nature at work (including the display of inappropriate posters).

Indirect discrimination occurs where the individual's employment is subject to an unjustified condition which is more difficult for one sex or race/nationality to meet even though the condition may seem harmless.

Examples:

- A requirement for GCSE English as a selection criterion. This would have a disparately adverse impact on people educated overseas and may not be justified if all that is needed is to demonstrate a reasonable level of literacy
- Full time work. This would have a disparately adverse impact on more women with small children as it is generally assumed they take the primary childcare role. If the business needs can still be met by more flexible working arrangements the requirement for full time employees would not be justified
- Advertising for “young graduate” or “mature person”. This could be considered age discriminatory as it would impact unfairly on an age group which could not be justified

Disability Discrimination occurs where an individual is unjustifiably treated less favourably in employment/recruitment for a reason connected with their disability. It can also occur where a disabled person is treated less favourably because there has been a failure to make reasonable adjustments to working arrangements.

Examples:

- A requirement for employees to hold a valid driving licence for a job which involves little travelling

- Failure to recruit a wheelchair user without first considering whether the working arrangements or premises can reasonably be adapted to their needs

Victimisation occurs where an individual is treated less favourably than colleagues because they have taken action to assert their statutory rights or assisted a colleague with information in that regard.