

	DIGNITY AT WORK AND EQUAL OPPORTUNITIES POLICY		REF:	CPOL02
			ISSUE:	05
			DATE:	15.07.2025

1. STATEMENT

The Company is committed to providing equal opportunities for all in employment and to avoiding unlawful discrimination in employment. The Company is also committed to creating a work environment that is free of harassment and bullying and where everyone is treated with dignity and respect.

2. SCOPE AND PRINCIPLES

This policy covers discrimination, bullying, harassment and victimisation of and by all managers, employees, contractors, agency staff and anyone else engaged to work within Cathodic Protection Co Ltd.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management.

3. DEFINITIONS

Discrimination is treating a person or group of people less favourably than you would another person or group in the same circumstances because of a Protected Characteristic. This could be intentional, direct or indirect or because of association or perception.

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Harassment is unwanted conduct related to relevant protected characteristics, that:

- Has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- Is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Victimisation is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Protected Characteristics are age, disability, sex, gender reassignment, pregnancy & maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership.

4. TYPES OF UNLAWFUL DISCRIMINATION

It is unlawful to discriminate directly or indirectly in recruitment or employment.

Recruitment: The wording of all job advertisements will be non-discriminatory. Each application will be considered on merit and assessed against objective, non-discriminatory criteria, which will be directly related to the demands of the particular vacancy. Directors should be prepared to objectively justify the selection of candidates.

Questions should not be asked which make assumptions about an applicant's commitment or ability based on the grounds of their personal circumstances.

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The Company will make reasonable adjustments to arrangements for interviews and conditions of employment, where appropriate, for applicants with disabilities to ensure that existing arrangements or conditions of employment do not place such applicants at a significant disadvantage to other applicants.

Training: No employee should be denied access to training on discriminatory grounds.

The Company will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

The Company will provide training to all new employees and others engaged to work at the Company to help them understand their rights and responsibilities under the Dignity at Work and Equal Opportunities Policy and what they can do to help create a working environment free of bullying and harassment.

Promotion: Applicants for promotion should be considered only on the basis of their skill, aptitude, experience and suitability for the vacancy. Qualities should be assessed objectively and without bias, by reference to selection criteria related to the demands of the vacancy.

Disciplinary Action: No employee shall be subject to disciplinary action, dismissed or subjected to inappropriate treatment within the workplace on discriminatory grounds.

Customers/Suppliers/Business Associates: No employee shall discriminate against any customer, supplier or business associate. Any employee who feels that they have been the victim of discrimination, harassment or bullying by a customer, supplier or business associate may complain of such using the Company's procedure set out below.

5. REASONABLE ADJUSTMENTS FOR DISABILITY

A person has a disability if he or she has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

It may sometimes be necessary to make temporary or permanent adjustments to the workplace, working conditions, work requirements or working hours to enable a person with a disability to continue at work.

If an employee is having difficulty managing their work or their attendance the Company will always consider which adjustments might be reasonable. Some examples are given below but this list is not exhaustive.

- Physical adjustments to the place of work to enable the employee to overcome the disadvantage caused by the disability, if they are practical, financially viable and would enable the employee to remain productive.
- Practical support such as re-allocating certain tasks or assigning help for certain tasks, if it is practical and financially viable to do so and would not significantly disrupt productivity.
- Reducing the hours of work or making the hours more flexible will be considered if to do so would enable the employee to remain in work and would not have a significant adverse effect the work of the department. Pay would be adjusted accordingly.
- Redeployment to other areas of the business if a suitable vacancy arises. Redeployment would be on the pay, terms and conditions appropriate to the role.

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6. BULLYING AND HARASSMENT

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Different people find different things acceptable. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others.

Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, e.g. sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, e.g. certain "banter", flirting or asking someone for a private drink after work.

In these cases, first-time conduct that unintentionally causes offence will not be harassment, but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

Harassment may also occur where a person engages in unwanted conduct towards another because they perceive that the recipient has a protected characteristic, when the recipient does not, in fact, have that protected characteristic. Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example if their child is disabled, wife is pregnant, or friend is a devout Christian.

A person may feel harassed even if the unwanted conduct is not directed towards them or related to their actual or perceived protected characteristic.

There may also be circumstances in which an individual is subjected to unwanted conduct from a third party, such as a client or customer. If an employee feels that they have been bullied or harassed by customers, suppliers, vendors or visitors, they should report any such behaviour to their manager who will take appropriate action. Bullying or harassment of customers, suppliers, vendors or visitors or others will be dealt with through the Company's Disciplinary Procedure.

A single incident can be harassment if it is sufficiently serious.

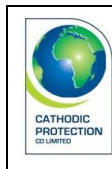
All bullying and harassment is misconduct and is a disciplinary offence that will be dealt with under the Company's Disciplinary Policy. Bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics. Serious bullying or harassment may amount to other civil or criminal offences, e.g. a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.

Examples of bullying or harassment: Bullying and harassment may be misconduct that is physical, verbal or non-verbal, e.g. by letter or email or through posting on social media.

Examples of unacceptable behaviour: that are covered by this policy include but are not limited to:

- Physical conduct ranging from unwelcome touching to serious assault;
- Unwelcome sexual advances and/or threats for rejecting sexual advances;
- Demeaning comments about a person's appearance;
- Unwelcome jokes or comments of a sexual nature or about a protected characteristic;



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- Questions about a person's sex life;
- Unwanted nicknames related to a protected characteristic;
- The use of obscene gestures;
- Excluding an individual because they are associated or connected with someone with a protected characteristic;
- Ignoring an individual because they are perceived to have a protected characteristic;
- The open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person;
- Spreading malicious rumours or insulting someone;
- Picking on someone or setting them up to fail;
- Making threats or comments about someone's job security without good reason;
- Ridiculing someone;
- Isolation or non-cooperation at work;
- Excluding someone from social activities.

7. VICTIMISATION

Provided that you act in good faith, i.e. you genuinely believe that what you are saying is true, you have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the Company will take appropriate action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have victimised you.

Making a complaint that you know to be untrue, or giving evidence that you know to be untrue, may lead to disciplinary action being taken against you.

8. RESPONSIBILITIES

We all have a responsibility to help create and maintain a work environment free of bullying and harassment. You can help to do this by:

- Being aware of how your own behaviour may affect others and changing it, if necessary - you can still cause offence even if you are "only joking";
- Treating your colleagues with dignity and respect;
- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable, unless it should be obvious in advance that this would be the case;
- Intervening, if possible, to stop harassment or bullying and giving support to recipients;
- Making it clear that you find harassment and bullying unacceptable;
- Reporting harassment or bullying to a Director and supporting the Company in the investigation of complaints; and
- If a complaint of harassment or bullying is made, not prejudging or victimising the complainant or alleged harasser.

Directors have a particular responsibility to:

- Set a good example by their own behaviour;
- Ensure that there is a supportive working environment;
- Make sure that staff know what standards of behaviour are expected of them;
- Intervene to stop bullying or harassment; and
- Report promptly to a Director any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.

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9. PROCEDURE

Where an employee feels that they are being harassed, bullied or discriminated against, prior to adopting a formal procedure, an informal approach may be taken.

Informal Procedure

The person may not know that their behaviour is unwelcome or upsetting. An informal discussion may help them to understand the effects of their behaviour and agree to change it. You may feel able to approach the person yourself, or with the help from your Director, trade union representative or another employee. Alternatively, an initial approach could be made on your behalf by one of these people. You should tell the person:

- What behaviour you find offensive and unwelcome.
- Say that you would like it to stop immediately.
- If the behaviour continues, you intend to make a formal complaint to your Director.

You should keep a note of the date and what was said and done. This will be useful evidence if the unacceptable behaviour continues and you wish to make a formal complaint.

Formal Procedure

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using the Company's Grievance Procedure. In the case of grievances about bullying or harassment, the normal Grievance Procedure is modified so that you can choose whether to raise your grievance with your Director. The complaint should be made in writing and where possible state:

- The name of the person the allegations of discrimination, bullying or harassment are being made against.
- The nature of the discrimination, bullying or harassment.
- Dates and times of when the incidents of discrimination, bullying or harassment have occurred.
- Names of witnesses to any incidents of discrimination, bullying or harassment.
- Any action already taken by you to stop the discrimination, bullying or harassment.

In very serious cases, a criminal offence may have been committed and you may wish to report matters to the police. A Director can arrange for someone to accompany you to make a complaint to the police.

All complaints will be investigated promptly and, if appropriate, Disciplinary Proceedings will be brought against the alleged harasser. You will have the right to be accompanied by a fellow worker or trade union official at any meeting dealing with your grievance in accordance with the Company's Grievance Policy.

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The Company will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. The importance of confidentiality will be emphasised to witnesses. If the complaint is upheld, and a person who has been found to have harassed you is kept in the Company's employment, managers may need to be given some information where this is necessary for them to manage the risk of further harassment by that person against you or others.

Wherever possible, the Company will try to ensure that you and the alleged harasser are not required to work together while the complaint is under investigation. This could involve giving you the option of working from home, where possible, or remaining at home on special leave, if agreed. In the case of serious allegations, the alleged harasser may be suspended while investigation and any disciplinary proceedings are underway.

If your complaint is upheld, and the person found to have bullied or harassed you remains in the Company's employment, every effort will be made to ensure that, if possible, you do not have to continue to work alongside the harasser, if you do not wish to do so. We will discuss the options with you.

If your complaint is not upheld, a Director will support you, the alleged harasser in making arrangements for you both to continue or resume working and to help repair working relationships. The Company will consider making arrangements to avoid you and the alleged harasser having to continue to work alongside each other, if either of you do not wish to do this.

10. MONITORING AND REVIEW

The company will monitor the effectiveness of its equal opportunities' procedures.

Employees will be asked to provide certain information for monitoring purposes. This data will be used only for these purposes and will be processed in accordance with our Data Protection Policy.

All employees are requested to keep the Company informed at all times of infringements of this policy. Such infringements should be brought to the attention of a Director.

Name: Chris Martin

**SIGNATURE REMOVED
PLEASE REFER TO PDF COPY
FOR SIGNED VERSION**

Position: Managing Director

Date: 15.07.2025