

Equal Opportunities and Harassment at Work Policy

The Group's Equal Opportunities Policy Statement and Policy Statement on Harassment at Work are in place to illustrate the commitment of the Board to Equal Opportunities. It is the responsibility of every employee to ensure his or her own conduct conforms to the expected standards and reflects these Policy Statements.

The aim of the policies is to encourage harmony and respect amongst employees, so as to promote good working practices with a view to maximising the performance and the return to Denmaur Independent Papers and its employees.

Equal Opportunities are taken very seriously by the Board and wilful failure to apply the policies or evidence of discrimination, harassment, bullying or victimisation will result in disciplinary action which may include your dismissal.

Equal Opportunities Policy Statement

- 1. We seek to employ a workforce which reflects the diverse community at large because we value the individual contribution of people irrespective of sex, age, marital status, disability, sexual orientation, gender reassignment, race, colour, religion or belief, ethnic or national origin.
- 2. All employees will be treated with dignity and respect. We will use best endeavours to provide a working environment free from unlawful discrimination, harassment or victimisation on the grounds of sex, pregnancy or maternity leave, age, marital status, disability, sexual orientation, gender reassignment, race, colour, religion or belief, ethnic or national origin, or age.
- 3. Denmaur Independent Papers recognises its legal obligations including those under the Race Relations Act, the Sex Discrimination Act, the Equal Pay Act, the Disability Discrimination Act, the Part-time and Fixed-term Workers legislation and the Employment Equality (Sexual Orientation) and (Religion or Belief) Regulations.

- 4. Denmaur Independent Papers undertakes to review periodically its selection criteria and procedures to maintain a system where individuals are selected, promoted and treated solely on the basis of their merits and abilities.
- 5. Denmaur Independent Papers will not tolerate acts which breach this policy and all instances of such behaviour or alleged behaviour will be taken seriously, fully investigated and may be subject to the Company's disciplinary procedures. The Company further seeks to give all employees equal opportunity and encouragement to progress within the organisation and receive training.
- 6. If an existing employee becomes disabled, we will make every effort to retain him or her within the workforce whenever reasonable and practicable.
- 7. Whenever reasonably practicable to do so we will install in existing premises facilities for people with disabilities. Whenever Denmaur Independent Papers invests capital in new or refurbished premises every practicable effort will be made to provide for the needs of staff and customers with disabilities.
- 8. Denmaur Independent Papers undertakes to distribute and publicise this policy statement to all employees and elsewhere as from time to time appropriate.
- Any employee who believes that they may have been subjected to treatment which breaches this policy may raise the matter through the grievance procedure of Denmaur Independent Papers.

Policy statement on harassment at work

- Denmaur Independent Papers believes that the dignity of every person must be respected. Harassment of colleagues or visitors is unacceptable and will be regarded as gross misconduct. The highest standards of conduct are required of everyone regardless of seniority.
- 2. Denmaur Independent Papers recognises that harassment may take many forms. It may be directed towards persons of either sex. It may relate to a person's ethnic origin, religion or belief, age, sex, pregnancy or maternity leave, sexual orientation, physical or mental attributes or some other personal characteristic.
- 3. Harassment may involve action or inaction, behaviour, exclusion, comment or physical contact that the recipient finds objectionable or offensive. It may result in the recipient feeling threatened, humiliated, intimidated, patronised, demoralised or less confident in their ability. Condoning such conduct may be harassment in itself. The test of harassment is, at least in part, subjective.

- 4. Examples of unacceptable conduct include:
 - verbal abuse, or insulting behaviour
 - sexist or racist jokes, jokes about an individual's sexual orientation or jokes about an individual's physical or mental attributes
 - the display or circulation of sexually suggestive or racially abusive material
 - bullying, coercive or threatening behaviour
 - the ridicule or exclusion of an individual for cultural or religious differences, on the grounds of sex or sexual orientation or on the grounds of disability
 - unsolicited or unwelcome conduct of a sexual nature including touching, staring or commenting
 - comments of a sexual nature about a person's appearance or dress
 - any conduct, whether or not of a sexual nature, which has the purpose or effect
 of intimidating, degrading, humiliating or offending someone simply because
 he/she is of a particular sex
 - treating someone unfavourably because they have rejected or submitted to unwelcome conduct of a sexual nature or to harassment on the grounds of their sex.
- Harassment, particularly on the grounds of sex, sexual orientation, race, disability, religion or belief or age, will be regarded as gross misconduct for disciplinary purposes. Accordingly, employees guilty of harassment run a serious risk of summary dismissal.
- 6. Equally, an allegation of harassment must not be made lightly. If it is found that an allegation of harassment has been made without foundation and maliciously then this will also be regarded as gross misconduct for disciplinary purposes.
- 7. All complaints of harassment should be made to your manager through the grievance procedure unless the complaint is regarding this person when you should complain to that person's superior.

Andy Buxton

Group Managing Director

July 2024