

V12	01/21	DW
Review Date		01/22



## Equal Opportunities & Dignity at Work Policy

---

### Statement of intent

The Company's Equal Opportunities and Dignity at Work Policy is designed for the elimination of discrimination, victimisation, harassment and bullying, and for the promotion of equality of opportunity in employment, recruitment, promotion and training.

The Company regards this policy as a commitment to make full use of the talents and resources of all its employees, and potential employees, and to provide a healthy environment, which will encourage good and productive working relationships.

### Policy objectives

The policy statement aims to ensure:

- That no employee or job applicant receives less favorable treatment than another on grounds of his/her sex, marital status, family commitments, disability, race, ethnic origin, religion, age, or sexual orientation.
- That no employee or job applicant is placed at a disadvantage by requirements or conditions which have a disproportionately adverse affect based on his/her sex, marital status, family commitments, disability, race, ethnic origin, religion, age, or sexual orientation, and which cannot be shown to be justifiable on any other grounds.

The company recognises the right of every employee to work in an atmosphere free of harassment and bullying and to be able to complain about it should it occur. The Company agrees to take appropriate steps to promote such a workplace

Employees who consider that they are a victim of discrimination, victimisation, harassment or bullying, should raise the issue through the grievance procedure.

There may be circumstances where it is inappropriate to raise the issue with the immediate line manager (e.g. it may be their manager's behaviour that is the cause for complaint). In such cases the matter should be raised with a more senior manager, a manager from a different area, or direct to the personnel department.

### Inappropriate or discriminatory behaviour

Discrimination, victimisation, harassment or bullying can take many forms but in general it is inappropriate, uninvited, unwanted, and sometimes unlawful, behaviour by one person, or more, against others which can cause offence, embarrassment and which can create fear, stress and tension in the workplace. In certain circumstances it can manifest itself in denial of opportunity or limit access or equality to certain rights or benefits of employment (e.g., to employment, promotion, training, pay rises, etc.). The opinions of the recipient of the inappropriate behaviour are placed above the views or intentions of the perpetrator in determining whether discrimination, victimisation, harassment or bullying has taken place,

The following are examples of inappropriate behaviour covered by this policy but should not be regarded as an exhaustive list.

- Physical or verbal conduct of a sexual nature,
- Inappropriate jokes, comments or written material, of a sexist, racist, ageist, etc. nature,
- Exclusion from the work group or the withholding of information that should be made available,
- Conduct which is abusive, insulting, intimidating, malicious or offensive,
- Unjustified criticism on a regular basis,
- Punishment imposed with unreasonable justification,
- Changes in work duties or responsibilities, to the employee's detriment, without justification,
- Denial of, or limiting access to, employment, promotion, training or development opportunities,
- Displays of offensive material.

#### Swish Building Products

V12	01/21	DW
Review Date		01/22



### **Duty of all employees**

Although the primary responsibility for enforcement rests with management, all individual employees have personal responsibility for ensuring compliance with this policy and any relevant legislation. Individual employees will be held personally liable for acts of discrimination, harassment, bullying, etc. that they commit, encourage, contribute to, or condone.

### **Complaints Procedure**

1. Wherever possible, an employee who believes that he or she has been the subject of discrimination or harassment should, in the first instance, ask the person responsible to stop their unacceptable behaviour. Person to person approach at an early stage will often be sufficient to stop the behaviour which is causing the offence without involving third parties. It may be appropriate to ask a trusted colleague to intervene and speak to the perpetrator.
2. If it continues, the employee should take their complaint through the **formal** stage of the grievance procedure, i.e. in writing to a more senior manager or to the Personnel Department.
3. All complaints will be handled in a timely and confidential manner. Employees shall be guaranteed a fair and impartial hearing and the matter will be fully investigated.
4. If the investigation reveals that the complaint is valid, prompt attention and disciplinary action designed to stop the harassment immediately and prevent its recurrence will be taken. In such circumstances, if relocation proves necessary, every effort will be made to relocate the harasser and not the victim.
5. Employees shall be protected from intimidation, victimisation or discrimination for filing a complaint or assisting in an investigation. Retaliation against an employee for complaining about harassment is a disciplinary offence.

*NB. While the objectives of this policy are clearly stated and are to be followed, for reasons of equity and justice, it must also be advised that any employee who raises a complaint, which upon investigation is proven to be deliberately vindictive then that employee will themselves become the subject of disciplinary proceedings.*

**Shaun Hanrahan**  
**Managing Director**