



Equal Opportunities and Harassment Policy

Last updated: 16 March 2015

Introduction

ICG plc (the "**Company**") is committed to creating an environment where all its employees are treated with dignity and respect at work and which is free from discrimination, victimisation, harassment and bullying. Such conduct is harmful to the Company's employees and its business and the Company will seek to address any form of discrimination, victimisation, harassment or bullying where it occurs in the workplace.

All employees and other third parties working for or with the Company, without exception, have a duty to comply with this policy to ensure that their colleagues are treated with dignity and respect and wherever possible to prevent discrimination, victimisation, harassment or bullying. A copy of this policy will be posted on the HR pages of the Portal.

Aim

The aim of this policy is:

- to ensure that all job applicants are treated fairly and judged on criteria relevant to a vacant position;
- to ensure that all employees are treated in a fair and equitable manner which allows each individual to reach their full potential;
- to ensure that decisions on recruitment, selection, training, promotion, career management, transfer, terms and conditions of employment and every other aspect of employment are based solely on objective and job related criteria;
- to provide the Company with a workforce of the highest ability which reflects the population as a whole;
- to avoid any type of unlawful discrimination; and
- to ensure all managers actively promote equal opportunities within the Company.

The Company strongly disapproves of and will not tolerate unlawful discrimination, victimisation, harassment, bullying or any other inappropriate behaviour towards its employees by managers, other employees or any third party such as clients, suppliers, visitors, consultants or contractors. The terms 'discrimination', victimisation 'harassment' and 'bullying' are explained below. All employees and third parties working for or with the Company are required to make sure they treat everyone fairly and without bias and should conduct themselves at all times with due regard to this policy.



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Scope

The areas where this policy applies, when employees are dealing with individuals and groups on the Company's behalf, include (but are not limited to):

- recruitment and selection processes;
- terms and conditions of service (including remuneration and access to benefits, services or facilities);
- training and promotion;
- dealing with colleagues, the general public, suppliers and clients;
- selection of employees for dismissal, including redundancy; and
- any other employment matter.

In relation to recruitment, the Company has a Recruitment process and guidelines which are posted on the portal. Following this approach will ensure that ICG's recruitment activity is conducted lawfully and is fair to all candidates. The Company is committed to increasing its commercial success by attracting and recruiting people who are best suited to meet the skills and competencies required for the role. For further details, please refer to the Recruitment Process and Guidelines on the Portal.

Discrimination

Discrimination occurs where a person treats another person less favourably than they treat or would treat others because of or in relation to one of the following:

- age;
 - disability;
 - gender reassignment;
 - marriage and civil partnership;
 - pregnancy and maternity;
 - race;
 - caste;
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- religion or belief;
- sex; and
- sexual orientation.

Together, these are known as "protected characteristics".

Victimisation

Broadly, victimisation occurs where a person is treated less favourably because they have done a "protected act". Examples of protected acts are making a complaint or giving evidence in relation to a complaint of discrimination. If a false allegation is made in bad faith, it will not be a protected act.

The Company undertakes to ensure that any employee who makes a complaint or who provides evidence about a complaint (in either case, in good faith) will not be subjected to detrimental treatment as a result.

Harassment

Harassment can take many forms but can broadly be described as unwanted behaviour, considered unacceptable by normal standards, which violates a person's dignity or creates a hostile, degrading, humiliating, intimidating or offensive environment. A single incident, if sufficiently serious, can amount to harassment.

The following list gives examples of conduct which may constitute harassment and are unacceptable. This list is neither definitive nor exhaustive:

- insensitive or unwelcome jokes, insults, remarks or pranks;
- offensive or demeaning remarks or conduct such as comments about appearance or dress;
- unacceptable nicknames and name calling;
- derogatory comments, abuse or gestures, leering, wolf-whistling;
- unwelcome sexual advances or unwanted physical contact; and
- displaying or sending offensive material, graffiti, email messages, graphics or objects directly to or about another person.

If the harassment is related to a protected characteristic, it will also constitute discrimination.



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Bullying or Intimidation

Bullying can take many forms and occur in many situations. Workplace bullying can range from extreme forms such as violence and public intimidation to less obvious behaviour. The following list gives examples of bullying. It is neither definitive nor exhaustive:

- unwarranted interference with the personal property of an individual;
- derogatory remarks, constant put downs or sneering;
- loss of temper, often over trivial matters;
- public or private criticism or humiliation;
- unreasonable delegation of duties and responsibilities;
- setting unrealistic deadlines or setting someone up to fail;
- deliberately ignoring or excluding an individual;
- spreading rumours; and
- misuse of power or position to intimidate or humiliate someone.

Legitimate, reasonable and constructive criticism of an individual's performance or behaviour, or reasonable instructions given to employees in the course of their employment will not amount to bullying.

Again, if the bullying or intimidation is related to a protected characteristic, it will also constitute discrimination.

Employees' Rights

Any employee who feels they have been subjected to discrimination, victimisation, harassment or bullying has the right to take appropriate action to ensure that the matter is addressed and resolved as quickly as possible. If the employee believes that the matter cannot be resolved informally by speaking with their Line Manager (or if the complaint involves the Line Manager), employees should contact the HR Department and/or raise a grievance following the Company Grievance Procedure.

The Company undertakes to treat all matters seriously, promptly (where practicable), fairly, sensitively and confidentially and to ensure dignity and respect are maintained. However, the Company may be obliged to disclose information obtained confidentially in the event that a matter is referred to a court or employment tribunal.



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Any employee making a complaint will receive support and advice from their Line Manager or the HR Department, and will be encouraged to maintain confidentiality.

Employees' Obligations

All employees have an obligation to prevent discrimination, victimisation, harassment or bullying from occurring by Company employees or third parties, both inside and, in certain circumstances, outside the workplace (e.g. at a client event). If employees observe discrimination, victimisation, harassment or bullying taking place, they are expected to bring it to the attention of their Line Manager or to the HR Department immediately.

Potential Sanctions

Conduct which constitutes discrimination, victimisation, harassment or bullying will constitute a disciplinary offence. Employees should be aware that, in more serious cases, such conduct may also constitute a criminal offence and, by law, employees may be personally liable for their actions and may also be liable to pay compensation.

Any employee accused of breaching the Company's Equal Opportunities Policy has the right to be given a clear account of any allegation so that they may state their case and the right to have a colleague accompany them to any subsequent meeting, investigation or hearing.

In appropriate circumstances, the Company's Disciplinary Policy will be followed. Suspension (with pay) may need to be considered in circumstances that appear to involve serious allegations or if there is good reason to separate the parties while the case is being investigated. Serious breaches of this policy may be deemed to constitute gross misconduct and as such may result in summary dismissal.