



## 2.19 EQUAL OPPORTUNITIES POLICY

This Equal Opportunities Policy Statement and the **Harassment Policy (see section 2.20)** are designed to assist in the Company's ongoing commitment to providing equal opportunities in the workplace, eliminating unlawful discrimination and eradication of harassment in the workplace. It is the responsibility of every employee to ensure their own conduct conforms to the expected standards and reflects these policy statements.

The aim of the policies is to encourage harmony and respect amongst individuals so as to promote good working practices, with a view to maximising the performance of the Company, and of its employees. In addition, GAP are also committed against unlawful discrimination of our customers and members of the general public.

If Equal Opportunities are not applied, then valuable talent and potential are wasted. Moreover, when unfair discrimination, harassment, bullying, or victimisation takes place, they bring about a climate of fear, insecurity, and poor work performance. As well as being illegal, it affects profitability and morale. It is therefore vital that every employee understands their responsibilities. It further seeks to give all employees equal opportunity and encouragement to progress within the organisation.

If an existing employee becomes disabled, the Company will make every effort to retain them within the workforce wherever reasonable and practicable. Wherever reasonably practicable to do so, the Company will install in existing premises facilities for people with disabilities. Whenever the Company invests capital in new or refurbished premises, every practicable effort will be made to provide for the needs of staff and customers with disabilities.

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

The Company will take very seriously any and all complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, members of the public and any others in the course of the Company's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and appropriate action will be taken. Complaints made could amount to gross misconduct and lead to dismissal without notice.

Furthermore, sexual harassment may amount to both an employment misconduct matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 (which is not limited to circumstances where harassment relates to a protected characteristic) is also a criminal offence.

### 2.19.1 THE EQUAL OPPORTUNITIES POLICY STATEMENT

The Company seeks to employ a workforce which reflects the diverse community at large because the

Company values the individual contribution of people irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race



(including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation.

The Company is committed to observe as far as possible the Equality and Human Rights Commission's Codes of Practice for Employment, Equal Pay and Services, Public Functions and Associations. Our dedicated central Recruitment Team and robust recruitment processes ensure that equal opportunity is afforded to all applicants both internal and external.

All employees will be treated with dignity and respect. The Company will use its best endeavours to provide a working environment free from unlawful discrimination, harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation.

This commitment includes training managers and all other employees about their rights and responsibilities under these policies. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and preventing bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they as individuals, as well as the Company, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and members of the public.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

The Managing Directors and Senior Management Team are responsible for ensuring that our Equal Opportunities and Harassment Policies are upheld. These policies are reviewed annually to ensure fairness and are also updated when necessary to take account of any legislative changes.

The Company recognises its legal obligations, including those under the Human Rights Act 1998 and the Equality Act 2010 including any subsequent amendments.

A handwritten signature in black ink, appearing to read 'Iain Anderson'.

**Iain Anderson**  
**Chairman**

**June 2026**



## **2.20 HARASSMENT POLICY**

The Company is committed to providing equality of opportunity to all its employees and will ensure that every employee is treated with dignity and respect during the course of your employment.

The policy of the Company is to provide a workplace that is free from harassment, bullying or abuse.

Harassment has serious consequences for both employees and the Company alike. It can cause stress and anxiety, poor work performance, increased absenteeism, reduced productivity and higher labour turnover, all of which has a direct impact on the Company's effectiveness.

The main aim of this policy is the prevention and cessation of harassment in the workplace, and to ensure the Company creates and maintains a safe and respectful environment for all employees across the business.

The Company aims to ensure that:

- harassment is known to be unacceptable
- individuals are confident to bring complaints without fear of ridicule or reprisal
- incidents are quickly and positively dealt with as close to the point of origin as possible

### **2.20.1 Definition of Harassment**

There is not, and probably cannot be, a single simple definition. This is because harassment takes many forms, occurs on a variety of grounds and may be directed at an individual or group of individuals. It is not the intention of the perpetrator but the deed itself and the impact on the recipient which determines what constitutes harassment.

### **2.20.2 Grounds of Harassment**

People can be subject to harassment on a wide variety of grounds. The undernoted are examples however, the list is not exhaustive. Anyone who is perceived as different or who is in a minority, or who lacks organisational power runs the risk of being harassed.

Grounds may include:

- race, ethnic origin, skin colour or nationality
- sex or sexual orientation
- marital status
- gender re-assignment
- religious or political convictions
- willingness to challenge harassment, leading to victimisation/bullying/abuse
- disabilities, sensory impairments or learning difficulties
- status as ex-offenders
- age (or youth)
- trade union membership or activity, or because of non-membership of a trade union

### **2.20.3 Forms of Harassment**

Harassment may take many forms including violence, bullying, and intimidation which can range from extreme and obvious behaviour to behaviour which may be regarded as innocuous and subtle like ignoring or undermining someone at work but nevertheless will have the same detrimental effects on the recipient. Harassment is deemed to be unwanted behaviour, which is unwelcome and unpleasant to the recipient.

Forms of harassment may include:

- Physical contact ranging from touching to serious assault.
- Verbal and written harassment through jokes, offensive language, gossip and slander, sectarian songs, letters
- Cyberbullying - harassment occurring through electronic communications such as social media, messaging services etc.
- Visual display of posters, graffiti, obscene gestures, flags, bunting and emblems etc.
- Isolation or non-cooperation at work, exclusion from social activities etc.
- Coercion ranging from pressure for sexual favours to pressure to participate in political/religious groups.
- Intrusion on a person's private space by pestering, spying or stalking them whether on or off the business premises

Employees can be harassed by colleagues or subordinates as well as by managers and supervisors. Customers, suppliers and contractors may be involved either as perpetrators or recipients.

### **2.20.4 Sexual Harassment**

The Company is obligated to take reasonable steps to prevent sexual harassment in the workplace. This includes fostering a safe and respectful environment for all employees.

By implementing clear policies and providing training, organisations can ensure compliance with legal requirements and promote a culture of respect.

Sexual Harassment has serious consequences for both employees and the Company alike. It can cause stress and anxiety, poor work performance, increased absenteeism, reduced productivity and higher employment turnover, all of which has a direct impact on the Company's effectiveness.

### **2.20.5 Definition of Sexual Harassment**

Sexual Harassment in the workplace refers to any unwanted behaviour or conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Under the Equality Act 2010, this includes inappropriate comments, gestures, physical contact, or requests for sexual favours. It can also involve treating someone unfavourably because they rejected or accepted such behaviour.

### **2.20.6 Forms of Sexual Harassment**

Sexual harassment can take many forms, including verbal comments, physical actions, or non-verbal cues that create an uncomfortable or hostile environment. Recognising these behaviours is the first step in addressing and preventing harassment in the workplace. By understanding the signs, individuals can contribute to a safer and more respectful environment for everyone.

Forms of sexual harassment may include:

- Verbal Harassment; for example, making sexual jokes or remarks, commenting on someone's appearance in a sexual manner, unwanted sexual advances or propositions, spreading sexual rumours or using derogatory or explicit language.
- Non-Verbal Harassment; for example, making lewd or suggestive gestures, staring or leering inappropriately, sending suggestive or explicit images or displaying sexually explicit materials in shared spaces.
- Physical Harassment; for example, unwanted touching, hugging or kissing, groping or brushing against someone intentionally, blocking someone's path or cornering them or sexual assault or attempted assault.
- Visual Harassment; for example, sharing sexually explicit or offensive images or videos, displaying inappropriate posters or screensavers, sending explicit or suggestive messages via email or text or exposing oneself or engaging in indecent exposure.

Employees can be sexually harassed by colleagues or subordinates as well as by managers and supervisors. Customers, suppliers and contractors may be involved either as perpetrators or recipients.

### **2.20.7 Legal Position**

Harassment of any form has been found to amount to discrimination under the Equality Act 2010. It may also lead to claims of victimisation under the Act.

In addition to discrimination claims harassment may lead to criminal claims for assault or civil claims from individuals for negligence or breach of contract. For example, harassment may lead to an individual resigning and claiming constructive dismissal.

### **2.20.8 Procedure for Dealing with Harassment**

It is preferable for all that complaints of harassment are dealt with informally wherever possible and appropriate. This is likely to produce solutions, which are speedy, effective and minimise embarrassment and the risk of breaching confidentiality.

Informal solutions however should not be used to discourage employees from recourse to formal procedures where they prefer that option.

### **2.20.9 Informal Procedure**

- 1. Action by Employee** - If you feel comfortable, then you may wish to speak to the harasser and explain that their conduct is unwelcome, offensive or interfering with work. You should be polite but firm and explain what conduct was unacceptable and unwanted. If you find this too difficult or embarrassing, you could ask a colleague to speak to the harasser on your behalf.

However, should the employee find either of these options unacceptable then you may proceed directly to the next stage, and raise the issue with a manager.

- 2. Action by Manager** – in some circumstances where appropriate on receipt of a complaint the manager depending on the wishes of the employee, may advise the harasser informally of their behaviour. The Manager will advise the complainant of the action that has been taken.

Where the procedure fails to resolve the matter, the individual has the right to move to formal procedures.

### **2.20.10 Formal Procedure**

Formal procedures will be necessary where the informal route proves ineffective, for more serious and/or repeated instances of harassment or where an individual prefers to use the formal procedure. The complainant should be advised of a right to representation.

The general principle should be that the decision to progress a complaint rests with the individual.

There may, however, be situations where that principle has to be balanced against the Manager's responsibility to ensure the general welfare of employees – particularly where serious complaints are made which the complainant is unwilling to pursue. This would always be done after consultation with the individual with every effort being made to protect the interest of the individual.

Counselling may help encourage the complainant to pursue the matter, though no undue pressure will be exerted.

### **2.20.11 Complaint, Investigatory and Disciplinary Stages**

Complaints should be reported as soon as possible to the employee's Manager or where this is not appropriate because the Manager is implicated, another Manager or more senior member of management.

The complaint can be made verbally initially but will have to be recorded in writing.

When dealing with and/or investigating a complaint the principles contained within the Disciplinary Procedure should be adhered to. Where there is a need to apply precautionary suspension or temporary redeployment pending an investigation into allegations of harassment, the alleged harasser will in normal circumstances be the individual who is suspended or moved.

The sensitive nature of harassment requires additional procedural steps to be taken which involve: -

- the right of both the complainant and the alleged harasser to be represented
- commitment to timescales for resolution of problems of which the complainant will be advised
- case investigators who are not connected with the allegations
- commitment to confidentiality for everyone involved, including witnesses
- ensuring care is taken that the complainant does not unnecessarily have to state repeatedly in evidence circumstances leading to the complaint
- a record of complaints and investigations being kept at all times
- where requested, and if possible, a member of the same gender should be involved in the investigation

If after reasonable investigation an investigatory officer believes that there are grounds for the complaint(s) to be considered at a disciplinary hearing, then such a hearing should take place in accordance with the Company's disciplinary procedure. There may be some circumstances where some other course of action is appropriate.

If in addition to the disciplinary action a transfer is seen as part of the solution to the problem, then the harasser will be the employee to be moved.

The harassed person will not be moved as an expedient, however, in circumstances where no action is taken consideration may still be given where practicable to the voluntary transfer of one of the employees concerned rather than requiring them to continue to work together against the wishes of either party.

### **2.20.12 Responsibility of the Company**

Responsibility for the application of this policy lies with the Managing Directors and the Senior Management Team. We will:

- Provide all employees, line managers and supervisors with a copy of this policy
- Provide appropriate training to line managers and supervisors
- Ensure that all complaints of harassment and bullying are dealt with promptly, seriously and confidentially in accordance with our internal procedures.
- Be alert to unacceptable behaviour and will take appropriate action to stop it
- Monitor all incidents of harassment and bullying and review the effectiveness of this policy periodically

### **2.20.13 Responsibilities of Employees**

Although the primary responsibility for providing a workplace free from harassment lies with the employer, individual employees have a responsibility to assist in the prevention of harassment and help protect themselves and the Company from allegations of harassment by:

- drawing to the attention of management suspected acts of harassment or practices which do not adhere to this policy
- refraining from harassment, victimisation, bullying or intimidation of employees or any other person on any grounds
- not being involved in deliberate behaviour, verbal statements, physical actions that are unwelcome and/or undermine fellow employees or any other persons
- not victimising individuals who have made allegations or complaints of harassment or who have provided information about harassment

The Company 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 disciplinary action.

The Company undertakes to distribute and publicise this policy statement to all employees and elsewhere as from time to time as appropriate. If you believe you may have been subjected to treatment which breaches this policy you may raise the matter through the grievance procedure of the Company.



**Iain Anderson**  
**Chairman**

June 2026