



EQUAL OPPORTUNITIES

POLICY STATEMENT

Eurosafe (the "Company") is an equal opportunities employer. This means that it is the Company's policy that there should be no discrimination, harassment or less favourable treatment or victimisation of any employee, job applicant, customer, provider of services or member of the public either directly or indirectly on the grounds of:

- A. race, nationality or ethnic origin;
- B. gender, gender reassignment, marital or family status;
- C. disability;
- D. trade union membership or activity;
- E. sexual orientation;
- F. religion or religious beliefs; or
- G. age.

In issuing this policy, the Company has three main objectives:

- A. to encourage its employees to take an active role in combating all forms of unlawful harassment and discrimination.
- B. to deter employees from participating in harassment or discriminatory behaviour; and
- C. to demonstrate to all employees that they can rely upon the Company's support in cases of unlawful harassment or discrimination at work.

The Company is fully committed to providing a good and harmonious working environment that offers equal treatment and equal opportunities for all its employees and where all its employees are treated with appropriate respect and dignity.

The Company recognises that the provision of equal opportunities in the workplace is not only good management practice but that it also makes sound business sense. The Company's equal opportunities policy is designed to help all employees develop their full potential and to ensure so far as practicable that the talents and resources of the workforce are fully utilised to maximise the efficiency of the organisation.

Whilst the Company recognises that the overall responsibility for the effective operation of this policy lies with the Board of Directors, all employees, whatever their position within the Company, have a personal responsibility for the practical application of the Company's equal opportunity policy, which extends to the treatment of Employees and Customers. In this respect, employees should ensure that:

- A. they co-operate with any measures introduced to develop equal opportunities;
- B. they refrain from taking discriminatory actions or decisions, which are contrary to either the letter or spirit of this policy;
- C. they do not harass, abuse or intimidate other employees, job applicants, customers, providers of services or members of the public in a manner contrary to either the letter or the spirit of this policy;

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- D. they do not instruct, induce, or attempt to induce or pressurise other employees to act in breach of this policy.

Breaches of the Company's equal opportunities policy and procedures will usually result in the Company's disciplinary procedure being invoked against the individuals responsible. In serious cases, the perpetrator may face dismissal.

RECRUITMENT

No job advertisements shall be publicised (internally or externally) in a way, which discourages viable applications from any sector of the population.

All applications will be considered on merit. Each individual will be assessed so far as practicable against a set of objectives, non-discriminatory criteria, which will be directly related to the demands of the particular vacancy.

All advertisements, application forms and other recruitment material should clearly state that the Company is an equal opportunities employer.

All interviews shall be conducted in accordance with the terms and spirit of this policy. The questions asked of candidates will only relate to the selection criteria in order to elicit information, which will give a fair assessment of that particular applicant's ability to perform the tasks required by the vacancy.

No one sector of the population will be disadvantaged or discriminated against in relation to the terms of employment offered or applied to them. When aware of the need to do so, the Company will endeavour to make reasonable adjustments to its arrangements for interviews and to conditions of employment for disabled applicants where necessary to ensure that existing arrangements or conditions of employment do not place such applicants at an unjustified and significant disadvantage relative to other applicants.

PROMOTION

Internal vacancies shall, be filled by promotion rather than external recruitment where practicable. However, internal candidates will not have preference over more suitably qualified external candidates.

The promotion criteria for all applicants shall be on the applicant's skill, aptitude, availability, experience, and general overall suitability for the vacancy.

Assessment of the qualities identified in clause 02.00 shall be objective and without bias by reference to selection criteria related to the demands of the vacancy.

The Company shall promote solely based on merit and ability.

02.04. TRAINING

Employees involved in recruitment and the management or supervision of others shall receive initial and on-going training to help them understand and comply with the law and Company policies.

No employee will be denied access to training on discriminatory grounds.

Specific and or additional training may be available for disabled employees as is reasonably necessary.

The Company shall provide training and development based on merit and ability of its employees.

Special responsibility for the practical application of the Company's equal opportunity policy falls upon managers and supervisors involved in the training of employees.

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MONITORING

The Company will monitor the effectiveness of its equal opportunities procedures to ensure as far as practicable that they are achieving the stated aims. To this end, all job applicants will be asked to provide information that denotes their sex, ethnic origin, marital status and any disability. The Company undertakes that this information will only be used for the purposes of monitoring the effectiveness of its equal opportunities policy. Should any failings in the application of this policy or any continuing inequalities become apparent, any appropriate positive action will be taken to redress the situation.

Records will be maintained to assist in the monitoring process.

HARASSMENT

Harassment for the purposes of this policy is unwanted conduct whether verbal or not, which is of a sexual or racial nature or which refers to or is based upon a person's disability, or other conduct based on someone's race, gender, disability, sexuality, age, or religion or belief, which affects the dignity of males and females at work.

Harassment or any other form of deliberate discrimination will not be tolerated under any circumstances and a member of staff who harasses or discriminates against another employee, client or customer of the Company will be subject to the Company's disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

Harassment generally may include any unwanted verbal or physical abuse and or advances and or behaviour, which an employee may find offensive and which causes them to feel threatened, humiliated, patronised, distressed or harassed. It will not necessarily be a defence that such incidents consist of words or behaviour which might be "common place", or which were intended as a joke or were not intended to be offensive. However, nothing in this policy takes away a manager's right to manage, including the imposition of reasonable pressure to perform to an acceptable level and where appropriate, of disciplinary sanctions. Where the manager's conduct is a reasonable response to a perceived problem this will not constitute bullying or harassment notwithstanding that this response may cause an employee to feel under threat or otherwise distressed.

Harassment may be open or covert, direct, or indirect, an isolated incident or a series of repeated actions. It may also include, in certain circumstances, off-duty conduct.

It is the duty and responsibility of the Company and every employee to take reasonable steps to stop all types of harassment and discrimination in the workplace. It is only through the efforts of individual employees that harassment and discrimination can be eradicated. We must all recognise that every employee in the Company has the right not to be subjected to any form of unlawful harassment or discrimination.

RACIAL HARRASMENT

Racial harassment is racial discrimination and is contrary to the Company's equal opportunities policy. It is also unlawful. This type of harassment will not be tolerated under any circumstances and the Company will take prompt action upon becoming aware that such incidents have taken place.

Examples of racial harassment may include:

- A. abusive language and racist jokes;
- B. racial name-calling;
- C. the display or circulation of racially offensive written or visual material including graffiti;

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- D. physical threats, assault and insulting behaviour or gestures on racial grounds;
- E. open hostility towards workers of a particular racial group, including organised hostility in the workplace;
- F. unfair allocation of work and responsibilities on racial grounds;
- G. exclusion from normal workplace conversation or social events, i.e. being "frozen out" on racial grounds.

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

SEXUAL HARRASMENT

Sexual harassment is similarly to sex discrimination, unlawful and contrary to the Company's equal opportunities policy. Sexual harassment excludes occasional compliments of a socially acceptable nature. It refers to behaviour towards others that is not welcome and that has sexual connotations.

Examples of sexual harassment may include:

- A. gender-specific jokes and or pranks;
- B. lewd comments about appearance;
- C. unnecessary body contact, flirting, advances and propositions;
- D. displays of sexually offensive material, for example pin ups and calendars;
- E. requests for sexual favours;
- F. gossip or speculation about an employee's private life and or sexual activities;
- G. threatened or actual sexual violence;
- H. threat of dismissal, loss of promotion etc for refusal of sexual favours;
- I. sexually degrading words to describe an individual;
- J. exclusion from normal workplace conversation and social events on gender grounds;
- K. unfair allocation of work and responsibilities on gender grounds.

Whilst the above list gives examples of sexual harassment, harassment takes many forms from relatively mild sexual banter to actual physical violence and the above examples are not intended to be exhaustive.

HARRASMENT ON GROUNDS OF SEXUAL ORIENTATION

Harassment of an individual because of his or her sexual orientation is unlawful. It is also contrary to the Company's equal opportunities policy, which seeks to ensure that people receive treatment that is fair, equitable and consistent with their skills and abilities regardless of their sexual orientation.

Examples of sexual orientation harassment may include:

- A. intentional or unintentional bullying which may involve nicknames, teasing, or behaviour, which is not with malicious intent, but which is upsetting;
- B. insensitive and offensive jokes;
- C. threatened or actual violence;

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- D. deliberate exclusion from conversations; or
- E. threat of dismissal, loss of promotion etc. on the grounds of religious belief.

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

02.10. HARRASMENT ON THE GROUNDS OF DISABILITY

Harassment of an individual because he or she has a disability or has had a disability in the past is unlawful. It is also contrary to the Company's equal opportunities policy, which seeks to ensure that people with disabilities receive treatment that is fair, equitable and consistent with their skills and abilities.

In accordance with statutory requirements, the Company recognises that a person with a disability is someone who has or has had a physical or mental impairment that has a substantial and long-term adverse effect on his or her normal day-to-day activities. Therefore, depending on individual circumstances a person who has been seriously injured, has or has had a progressive illness, significant learning difficulties or poor hearing, vision or mobility may be a person with a disability.

Harassment on grounds of disability may include the following:

- A. abusive or insensitive disability specific language;
- B. inappropriate jokes or pranks on disability grounds;
- C. non-verbal offensive gestures;
- D. inappropriate assumptions about the capabilities of a disabled person;
- E. unfair allocation of work and responsibilities on disability grounds;
- F. exclusion from normal workplace conversation or social events on disability grounds;
- G. physical mistreatment (e.g. jostling or assault) on disability grounds.

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

As part of the Company's equal opportunities policy we will aim, if a disabled person joins the Company or if an existing employee becomes disabled, to make such reasonable adjustments as are required by law, whether in his or her existing job or in a suitable available alternative.

The Company will seek to ensure that the needs of people with disabilities are considered generally in both the context of the Company's working practices and in the nature of its premises and continuing services. Nothing in this policy or the general law prevents the Company from dismissing a disabled person on capability or other grounds or from subjecting him or her to other less favourable treatment if that action is justified by the nature or extent of that person's disability and or the Company's reasonable inability to make adjustments which would have the effect of diminishing or removing the effect of the disability on the person's ability to work.

HARRASMENT ON GROUNDS OF RELIGIOUS BELIEF

Harassment of an individual because of his or her religion or religious belief or because of the religion or religious belief of those individuals with whom he or she associates is unlawful. It is also contrary to the Company's equal opportunities policy, which seeks to ensure that people receive treatment that is fair, equitable and consistent with their skills and abilities regardless of their religion or religious beliefs.

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Examples of religious belief harassment may include:

- A. intentional or unintentional bullying which may involve nicknames, teasing, or behaviour, which is not with malicious intent, but which is upsetting;
- B. insensitive and offensive jokes;
- C. threatened or actual violence;
- D. deliberate exclusion from conversations; or
- E. threat of dismissal, loss of promotion etc. on the grounds of religious belief.

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

HARRASMENT ON GROUNDS OF AGE

Harassment of an individual because he or she is of a certain age is unlawful. It is also contrary to the Company's equal opportunities policy, which seeks to ensure that people of all ages receive treatment that is fair, equitable and consistent with their skills and abilities.

Harassment on grounds of a person's age may include the following:

- A. abusive or insensitive age specific language;
- B. inappropriate jokes or pranks on grounds of age;
- C. non-verbal offensive gestures;
- D. inappropriate assumptions about the capabilities of a person of a certain age;
- E. unfair allocation of work and responsibilities on grounds of age;
- F. exclusion from normal workplace conversation or social events on grounds of age;
- G. physical mistreatment (e.g. jostling or assault) on grounds of age.

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

VICTIMISATION

Victimisation occurs when a member of staff treats an existing or former member of staff less favourably because:

- A. that other person has in good faith brought proceedings alleging that he or she has been unlawfully discriminated against; or
- B. has indicated that they intend to make such a claim or claims; or
- C. they have assisted a colleague to make such a claim whether or not that claim is accepted as having any merit.

Victimisation will not be tolerated under any circumstances and any member of staff who victimises another employee will be subject to the Company's disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct resulting in summary dismissal.

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COMPLAINTS AND DISCIPLINARY ACTION

Where an employee believes that he or she is being harassed, victimised or discriminated against contrary to the law or to the equal opportunities policy he or she can invoke the complaints procedure, whether formal or informal, against the alleged harasser or discriminator.

Every complaint will be investigated and dealt with sympathetically and without bias and as quickly, as is practicable. The Company recognises that some complainants may prefer not to have their names used going forward. The Company will seek to accommodate such requests as far as practicable, but staff will appreciate that if the Company is unable to mention names this may limit its ability to investigate the complaint with the alleged perpetrator. This in turn may limit the extent to which the Company can pursue the complaint and or take action against the perpetrator.

Employees who feel they have been subject to harassment should not hesitate in using this procedure without fear of victimisation. Every effort will be made to ensure that individuals who make a complaint in good faith will not suffer any further detriment or be victimised because of making such a complaint. However, a complaint, which is made maliciously or otherwise in bad faith, may render the complainant liable to disciplinary action. Any complaint of victimisation will be dealt with seriously, promptly and (so far as practicable) confidentially.

Retaliation against an employee who brings a complaint of harassment is a disciplinary offence, which may constitute gross misconduct.

INFORMAL PROCEDURE

Prior to adopting the formal procedure set out below an informal approach may be taken. While recognising that it may not always be appropriate, the Company recommends in most cases that an informal approach to stopping the harassment should be the first step.

If an individual feels that he or she is or has been subjected to harassment and or discrimination or victimisation and considers that the informal procedure is appropriate he or she should, if possible, advise the harasser that the behaviour specified is unwelcome, must be stopped and is interpreted by the complainant as harassment and or discrimination and or victimisation as defined by the Company's policy statement. If an Employee is unable to do this verbally then a written request may be effective.

If the behaviour does not cease or the employee finds approaching the harasser difficult, further informal assistance is available. Employees, who wish to discuss such a complaint in confidence, should contact their manager. Alternatively, a complainant may move to the formal procedure.

FORMAL PROCEDURE

Where the informal method fails, serious harassment or discrimination occurs, or if the individual prefers, employees are advised to bring a formal complaint against the alleged harasser or discriminator and to seek assistance as above in doing so. The complaint should be made in writing and, where possible, state the following:

- A. the name of the alleged harasser / discriminator;
- B. the details of the harassment / discrimination / victimisation alleged;
- C. the date and time when the harassment / discrimination or victimisation occurred;
- D. the names of any witnesses to the harassment / discrimination or victimisation; and
- E. details of any action, which may already have been taken by the complainant to stop the harassment / discrimination or victimisation.

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The complaint should be sent or given to your manager or if your complaint is against the manager then to a Director. Where a complaint of harassment, discrimination or victimisation is received, consideration will be given to whether it would be helpful and or practicable to separate the alleged harasser or discriminator from the complainant. This may involve the temporary transfer of the alleged harasser or discriminator or the complainant to another department or suspension with pay until the complaint has been resolved. This does not amount to a pre-determination of the matter.

The employees' manager or a Director will carry out a thorough investigation as quickly as possible, maintaining as much confidentiality as possible at all times. The complainant should be aware, however, that if the complaint is to be properly investigated, other employees might have to be asked for witness statements.

All employees involved in the investigation, including the complainant are expected to respect the need for confidentiality. Failure to do so will be considered a disciplinary offence.

Copies of witness statements taken may be made available to the alleged harasser and the complainant. Witnesses will be encouraged to appear at any hearing if requested by either party. It is acknowledged that some witnesses may be reluctant to do so. In these circumstances, the manager will, if necessary, adjourn the hearing and ask supplementary questions of witnesses in private.

At any stage of the investigation, including any disciplinary hearing held as a result of the investigation, both the complainant employee and the person accused of harassment may be accompanied by a fellow worker or trade union official of their choice.

If the offence is proved the severity of the penalty imposed on the harasser will be consistent with those detailed in the disciplinary procedure. Serious harassment or acts of deliberate discrimination or victimisation may result in summary dismissal. Where a lesser penalty is appropriate, for example a Written warning, this may be coupled with action to ensure, as far as practicable, that the complainant is able to continue working without embarrassment or anxiety. After discussion with the complainant, the manager may transfer one party to a different work area or arrange for an amendment of working practices to minimise contact between the two employees. The result of the hearing will be confirmed in writing to both the complainant and the person accused of harassment.

If the complainant is not satisfied about the way the employees' complaint has been handled, they may appeal to a Director. The appeal should be made in writing within 5 working days of the date the employee receives the outcome of the first hearing. A written decision of the second hearing will be sent to the employee and will be final.

If an employee brings a complaint of harassment, discrimination, or victimisation in good faith the employee will not suffer victimisation for having brought the complaint.

DISCIPLINE

Any acts of discrimination or acts, which contravene this policy, may result in the disciplinary procedure being invoked against the individuals responsible or involved. In severe cases, summary dismissal may be justified.

All members of staff are encouraged to use the procedure outlined in this policy if they believe that they are being harassed, discriminated, or victimised. However, if an allegation is made, which the Company (after investigation) believes has been made dishonestly or maliciously, the Company may invoke the disciplinary procedure against the complainant. Such behaviour may constitute gross misconduct and result in summary dismissal.

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PRINCIPLES

At every stage in the procedure the employee will be advised of the nature of the complaint against them, and they will be given the opportunity to state their case before any decision is made. If the complaint is upheld, the employee will be informed of the disciplinary action to be taken in writing and this will be recorded on their personnel file.

Confidentiality will be maintained in the proceedings and the employee will not be discriminated against on any grounds.

At all stages, the employee will have the right to be accompanied at the disciplinary hearing by a work colleague or a trade union official of their choice.

The employee will have the right to appeal against any disciplinary action taken.

Signed:

Gavin Ellis

CEO

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