

EQUAL OPPORTUNITIES & DIVERSITY POLICY

Statement of Intent

GreenTec Recruitment does not and shall not discriminate on the basis of race, colour, religion, gender, age, ethnic or national origin (ancestry), disability, marital status or sexual orientation in any of its activities or operations. These activities include, but are not limited to, candidate selection, selection of volunteers and vendors, provision of services. We are committed to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, and clients.

In accordance with the Maritime Labour Convention 2006 we commit to:

- not placing Seafarers under the age of 16
- not requesting Seafarers to pay fees or other charges for their potential recruitment or placement.
- not holding a list of Seafarers that would prohibit them from finding employment.

1. GENERAL

1.1 GreenTec Recruitment embraces diversity and will seek to promote the benefits of diversity in all of our business activities. We will seek to develop a business culture that reflects that belief. We will seek to widen the media in which we recruit to ensure as diverse an employee and candidate base as possible. We will strive to make sure that our clients meet their own diversity targets.

GreenTec Recruitment is committed to diversity and will promote diversity for all employees, workers and applicants and shall adhere to such a policy at all times. We will review on an on-going basis all aspects of recruitment to avoid unlawful or undesirable discrimination.

1.2 GreenTec Recruitment shall not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. GreenTec Recruitment will ensure that each candidate is assessed only in accordance with the candidate's merits, qualifications and abilities to perform the relevant duties required by the particular vacancy. GreenTec Recruitment will not accept instructions from clients that indicate an intention to discriminate unlawfully.

2. DISCRIMINATION

Unlawful discrimination occurs in the following circumstances:

2.1. Direct discrimination

Direct discrimination occurs where one individual treats or would treat another individual less favorably on grounds of race, colour, religion, gender, age, ethnic or national origin (ancestry), disability, marital status or sexual orientation ("the protected categories").

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds that they are members of a protected category. -

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or deliberately omitting to provide any of its services;
- in the way it provides any of its services.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon a job registration from an employer which states that certain persons are unacceptable because they are members of a protected category, unless one of the exceptions applies, for instance, the job demands a genuine occupational requirement or, in the case of age, the discrimination can be lawfully justified.

2.2. Indirect Discrimination

Indirect discrimination occurs where an agency or employer applies a provision, criterion or practice generally, but which is such that a proportion of persons in a protected category who can comply with it are considerably smaller than the proportion of persons who are not in that protected category.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to a genuine occupational requirement or the instruction is lawfully discriminatory due to a statutory exception or objective justification, GreenTec Recruitment will not deal further with the vacancy unless the client provides written confirmation of such genuine occupational requirement, exception or justification.

2.3 DISABLED PERSONS

2.3.1 Direct Discrimination

Direct discrimination against a person occurs where, if for a reason which relates to the disabled person's disability, an individual:

- treats him less favourably than he treats, or would treat others to whom that reason does not or would not apply, and,
- the employer cannot show that the treatment in question is justified.

Or

- If on the ground of a disabled person's disability, he treats the disabled person less favorably than he treats or would treat a person not having that particular disability, whose relevant circumstances, including his abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

2.3.2 Duty to make reasonable adjustments and to provide auxiliary aids and services.

This is a similar protection to indirect discrimination in the other protected categories.

Where a provision, criterion or practice applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled, it will be the duty of an employer to take such steps as are reasonable, in all the circumstances of the case, to remove the provision, criterion, practice or physical feature.

GreenTec Recruitment will not discriminate against a disabled person on the grounds of disability -

- in the arrangements i.e. application form, interview, or arrangements for selection for determining to whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- by subjecting him or her to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

GreenTec Recruitment will accordingly make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Wherever possible GreenTec Recruitment will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

3. AGE DISCRIMINATION

GreenTec Recruitment will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to persuade clients to recruit on the basis of competence and skills and not age.

GreenTec Recruitment is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age.

No age requirements will be stated in any job advertisements on behalf of the company.

GreenTec Recruitment will request age as part of its recruitment process but such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process.

4. PART-TIME WORKERS

This Diversity Policy also covers the treatment of those employees and workers who work on a part-time basis GreenTec Recruitment recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. GreenTec Recruitment also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

5. HARASSMENT POLICY

5.1 GreenTec Recruitment is committed to providing a work environment free from unlawful harassment on grounds of race, colour, religion, gender, age, ethnic or national origin (ancestry), disability, marital status or sexual orientation or any other basis protected by legislation is unlawful and will not be tolerated by The Environmental Recruitment Solutions Group Limited.

5.2 This policy prohibits unlawful harassment by any employee or worker of The Environmental Recruitment Solutions Group Limited.

5.3 Examples of prohibited harassment are: -

5.3.1 Verbal or written conduct containing derogatory jokes or comments,

5.3.2 Slurs or unwanted sexual advances

5.3.3 Visual conduct such as derogatory or sexually orientated posters,

5.3.4 Photographs, cartoons, drawings or gestures which some may find offensive,

5.3.5 Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected category basis. Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favors.

5.3.7 Retaliation for having reported or threatened to report harassment.

5.4 If you believe that you have been unlawfully harassed, you should make an immediate report to Jim Ryan or Lucien Sullivan followed by a written complaint as soon as possible after the incident. Your complaint should include:

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- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

5.5 GreenTec Recruitment will undertake a thorough investigation of the allegations. If it is concluded that unlawful harassment has occurred, remedial action will be taken.

5.6 Any employee(s) who GreenTec Recruitment finds to be responsible for unlawful harassment will be subject to the disciplinary procedure and any sanction may include termination. A person who discriminates or harasses may be personally liable for payment of compensation to the person offended, in addition to any compensation payable by GreenTec Recruitment. There is no statutory cap on the amount of compensation which may be awarded in discrimination cases. Under the Criminal Justice Act 1994, harassment became a criminal offence, punishable by a fine of up to £5,000 and/or a prison term of up to 6 months. Under the Protection from Harassment Act 1997, the penalties for aggravated harassment are an unlimited fine and/or 5 years imprisonment.

6. COMPLAINTS AND MONITORING PROCEDURES

6.1 GreenTec Recruitment has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from Jim Ryan or Lucien Sullivan and will be made available immediately upon request.

6.2 Any discrimination complaint will be investigated fully.