

Equal Opportunities Policy Statement

J. Breheny Contractors Ltd is an equal opportunities employer. It is this organisation's policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, age or perceived age, race, colour, nationality, national origins, ethnic origin or disability.

To ensure that direct or indirect discrimination is not occurring, recruitment and other employment decisions will be regularly monitored in conjunction with ethnic records of job applicants and existing employees.

Selection criteria and procedures will be kept under review to ensure that individuals are selected, promoted and in all other ways treated on the basis of their relevant merits and abilities. All employees will be given equality of opportunity within the company's service and will be encouraged to progress within the organisation.

Through this policy and procedure and the training and development of managers and staff, the organisation will do all it can to promote good practice in this area in order to eliminate discrimination or harassment so far as is reasonably possible.

It is the duty of all employees to accept their personal responsibility in the implementation of the Policy. At the same time, the Company acknowledges that specific responsibilities fall upon management, supervision and individuals professionally involved in recruitment and employee administration. Any employee who believes that he or she has been unfairly treated in any sense associated with this policy is entitled to raise the matter through the appropriate grievance procedure.

The Company is committed to a programme of action to make this policy fully effective.

Authorised by the Board of J. Breheny Contractors Limited

This Policy is to be reviewed no later than 31st December 2010.

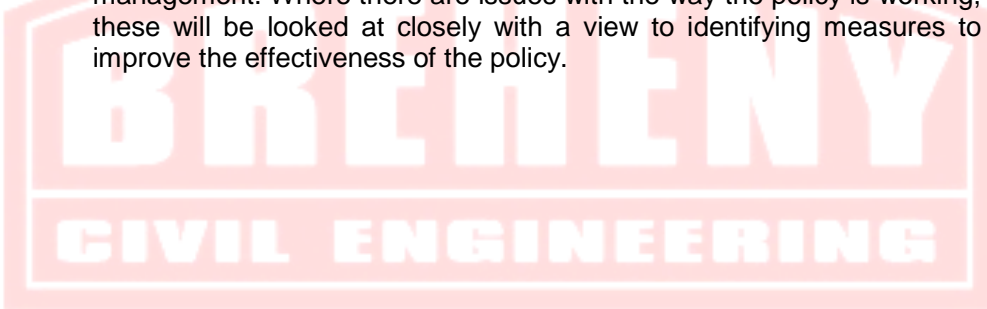


JNE Breheny
Chairman and Chief Executive
December 2009

Equal Opportunities Policy Procedure

1. J Breheny Contractors Ltd is an equal opportunity employer. Equal opportunity is about good employment practices and efficient use of our most valuable asset, our employees. Every manager and employee has personal responsibility for the implementation of the policy. Any instance of doubt about the application of the policy, or other questions, should be addressed to [job title], as should any requests for special training.
 2. The organisation will not discriminate on grounds of sex, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, race, ethnic origin, colour, nationality, national origins, disability or age.
 3. The policy applies to the process of recruitment and selection, promotion, training, conditions of work, pay and benefits and to every other aspect of employment, including general treatment at work and the processes involved in the termination of employment.
 4. Where increased pay and/or enhanced benefits are offered to employees on the basis of length of service, these are intended to reward loyalty, maintain motivation and reflect higher levels of relevant experience.
 5. The policy applies to job applicants (both internal and external) and all employees whether full time, part time, temporary, seasonal or contract.
 6. Employees should note that the imposition of any provision, criterion or practice which has a disproportionate adverse impact on someone on grounds of his or her sex, race, marital status, civil partnership status, religion or belief, sexual orientation or age will be unlawful unless it can be objectively justified. In the event of any query or doubt, the Group Managing Director should be consulted.
 7. When establishing criteria for recruitment and promotion into vacant posts, the employer will consider carefully whether any minimum or maximum number of years of relevant experience is necessary for effective performance of the job. Such restrictions will not be imposed unless there is a proper job-based reason why they are necessary.
 8. The employer operates a retirement age of 65 for all employees. Employees have the right, however, to submit written requests to continue working beyond this age (see the company's retirement policy).
 9. Optional: The employer will, whenever it is operationally possible to do so, agree to any request from an employee who is within two years of retirement (ie at any time after his or her 63rd birthday) to reduce his or her hours of work with a view to a phased retirement. The precise reduction to the number of days or hours worked will be discussed individually in each case.
 10. Employees who are disabled or become disabled in the course of their employment should inform the organisation about their disability. Management will then arrange to discuss with the employee what reasonable adjustments to his or her job or working conditions or environment might assist him or her in the performance of his or her duties. The employee will also be encouraged to suggest any adjustments that he or she believes would be helpful. Careful consideration will be given to any proposals and, where reasonable and reasonably practicable such adjustments will be made. There may, however, be circumstances where it will not be reasonable or reasonably practicable for the organisation to accommodate proposals put forward by the employee.
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11. Any member of staff may use the Grievance Procedure to complain about discriminatory conduct. If the matter relates to sexual or racial harassment or harassment on the basis of disability, sexual orientation, religion or belief or age, then the complaint may be raised directly with the Chairman, Group Managing Director or Deputy Group Managing Director. The organisation is concerned to ensure that staff feel comfortable about raising such complaints. No individual will be penalised for raising such a complaint unless the substance of the complaint is untrue or the complaint is made in bad faith, for example out of malice.
12. Where an employee is falsely accused of discriminatory conduct, then he or she may implement the organisation's grievance procedure. In this instance, the person who made the false accusation may be subjected to disciplinary action. In serious cases, such behaviour may be deemed to constitute gross misconduct and may result in summary dismissal.
13. All employees and job applicants will be asked to complete a form denoting their sex, race, ethnic origin, age and any disabilities that they have. The organisation guarantees that the information provided on this form will be used solely for the purpose of monitoring the effectiveness of its equal opportunities policy.
14. This policy will be monitored on a regular basis by the senior management. Where there are issues with the way the policy is working, these will be looked at closely with a view to identifying measures to improve the effectiveness of the policy.



Recruitment

The aim of the Company is to recruit employees on a fair and non-discriminatory basis. Vacancy advertisements should be placed in positions of greatest access to a wide community. These include local and regional newspapers and local job centres. Recruitment only by “word of mouth” is illegal and must not be practised.

Wording of advertisements should not place unfair restrictions or requirements on particular racial group or groups and qualifications necessary for the effective performance of the job. The phrase “An Equal Opportunity Employer” must be included on all adverts.

Selection

The aim of the Company is to select employees on a fair and non-discriminatory basis. Applicants will be measured solely against the requirements of the job. The Company will monitor applications to ensure compliance with the requirements of this policy

Promotion

The aim of the Company is to promote employees on a fair and non-discriminatory basis. The criteria for promotion are to be based solely upon a person’s record of achievement and ability to carry out their new duties. Records of the ethnic origin of promoted employees will be kept (for monitoring purposes only).

The Company will periodically review the promotion procedure in conjunction with the above records.

Training

The aim of the Company is to ensure that all its employees have equal access to training and development opportunities. The training and development register will include a record of the ethnic origin of all employees in order to monitor compliance with the above aim.

Those persons responsible for recruitment, selection and promotion will receive ongoing training in equal opportunities.

Dismissal (Including Redundancy) and Other Detriment

The aim of the Company is to ensure that it does not unlawfully or unfairly discriminate on racial grounds in dismissal, redundancy or other detriment to an employee. The procedures and criteria used in these matters will not directly or indirectly discriminate against a particular racial group or groups.

The Company will keep a record of the ethnic origin of all employees dismissed or selected for redundancy in terms of their ethnic origin and grade.

Positive Action

Wherever possible the Company will take positive action to encourage the selection, training and promotion of racial group or groups that are found to be under-represented at a particular grade or occupation.

Monitoring

To ensure the effectiveness of this policy the Company monitors the makeup of its existing workforce by keeping a record of their ethnic origin and grade. The recruitment and selection process is monitored by keeping a record of the application rate, those short-listed for interview and job starters in relation to their ethnic origin and grade. Records regarding promotion, training, dismissal (including redundancy) and other detriment will also be monitored to ensure compliance with this policy.

This information is carefully and regularly analysed in order to identify areas which may need particular attention and where necessary changes to this policy will need to be made.

Grievance, Disciplinary and Disputes Procedures

Grievances and complaints regarding discrimination will always be investigated by the Company at no personal or professional cost to the employee concerned.

Employees found to have committed a racially discriminatory act, e.g. racial harassment, verbal or racial abuse, physical violence, will have disciplinary procedures brought against them. These are serious employment issues and are in breach of the Race Relations Act 1976.

Management of Policy

The director responsible for the implementation of this Policy is Mr. J N E Breheny. All complaints and queries will be dealt with by him, in the strictest confidence.
