

MONSOON · ACCESSORIZE

Equal Opportunities Policy

1. Introduction

1.1 Purpose

To provide a policy and associated procedures for employees explaining how we apply our Equal Opportunities Policy to all people activities to ensure that we not only comply with legislation but also are able to attract top quality talent to our organisation regardless of background and practices.

1.2 Scope

This policy applies to all employees, potential employees during the recruitment process, freelancers, suppliers and contractors, whether temporary or permanent. It applies to all processes relating to employment and training and to any processes relating to our customers.

2. Policy statement

Monsoon Accessorize is committed to providing equal opportunities and diversity in employment and to avoiding unlawful and unfair discrimination in employment or to customers.

The company values the differences that a diverse workforce brings to the organisation and this policy is intended to assist the company to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

All our employment policies and practices are designed and intended to be fair and equitable in order to build a culture that values openness, fairness and transparency. Everyone has equal access to promotion, learning and development opportunities. We aim to ensure that as a company we have access to the widest labour market and secure the best individuals for our needs, whatever their background. Wherever possible we aim to fill vacancies internally either by transfer or promotion. However, sometimes it is necessary to recruit externally to bring in specialist skills or experience. Vacancies will normally be advertised.

During employment, we will ensure that individuals do not receive less favourable treatment on the grounds of their sex, race, (which includes colour, ethnic or national origin), religion or belief, pregnancy, gender reassignment, sexual orientation, disability, marital status, trade union membership, age, political affiliation or on the basis of being an ex-offender with a spent sentence.

This policy also clarifies types of discriminatory practices which are not acceptable and distinguishes between 'direct' and 'indirect' discrimination.

Any complaint of such discrimination will be treated with the utmost seriousness and will be the subject of a full investigation.

This policy defines the company's and the employee's responsibilities.

3. Overview

The policy covers the following:

- Direct and indirect discrimination
- The impact of this legislation on the business
- The benefits of compliance
- The consequences of non-compliance

4. Related policies and documentation

- Grievance Policy
- Disciplinary Policy

5. Policy details

5.1 Provision of goods, facilities and services

It is unlawful to discriminate directly or indirectly in the provision of goods, facilities or services to customers on the grounds of sex, gender reassignment, pregnancy, colour, race, nationality or ethnic or national origins.

It is unlawful to discriminate, without justification, on grounds of disability or to fail to make reasonable adjustments including the removal, adaptation or alteration of physical features, unless the physical features make it impossible or unreasonably difficult for a disabled person to make use of services.

5.2 Direct discrimination

This is forbidden and relates to the making of decisions and/or less favorable treatment based solely upon an individual's sex, race, colour, ethnic or national origin, religion or belief, pregnancy, gender reassignment, sexual orientation, disability, marital status, trade union membership, age, political affiliation or on the basis of being an ex-offender with a spent sentence.

Any adverse treatment of pregnant employees or potential employees is regarded as sex discrimination.

5.3 Indirect discrimination

This is forbidden and relates to the imposition of a condition, provision, criterion or practice which has a disproportionate adverse impact on one particular group thereby putting members of that group at a disadvantage.

Examples of unacceptable, potentially discriminating behaviour:

- The display of flags or emblems which could be provocative
- Calendars of scantily clad ladies and gentlemen
- Insensitive jokes or pranks
- Victimisation due to gender or other reasons covered in the list above
- Rude/offensive e-mails or text messages
- Offensive magazines on open display
- Rude and offensive language
- Calling people by a nickname related to their race, disability, nationality etc
- Deliberate exclusion from meetings, conversation etc. on grounds outlined above

The list is not exhaustive and each individual incident will be considered on the facts and circumstances at the time.

5.4 Job design and recruitment

Job specifications will be limited to those requirements that are necessary for the effective performance of the job. As vacancies arise or departments are restructured the requirements of individual jobs will be reviewed and redesigned, where necessary, in order to ensure the broadest possible catchment of experienced recruits of suitable calibre.

Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability, personal or home commitments will not form the basis of employment decisions except where necessary.

The company will consider any possible indirect discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the company considers it has good reasons, unrelated to any prohibited ground of discrimination, for doing so.

The company will comply with its obligations in relation to statutory requests for contract variations. The company will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

5.5 Advertisements

Vacancies will normally be advertised within the company in order to provide an equal opportunity for all interested individuals to apply.

All external recruitment will be conducted according to the Recruitment and Selection Policy. Applications will be encouraged from all suitably qualified individuals.

An exception to the above applies when special arrangements are made for the redeployment of individuals who would otherwise be at risk from redundancy.

All advertisements, whether internal or external, must be approved by the HR department after discussion with the manager recruiting for the vacancy.

5.6 Recruitment, transfers and promotions

When used, the external Application Form has been designed in order to obtain all the necessary information to provide the basis for an equitable and instructive interview and for the screening and selection of applicants.

Personal details which are not necessary for a recruitment decision to be made, such as marital status, next of kin, gender, race, age are not requested. Additional details of this nature will be required for recording and monitoring purposes, and as such will be kept by the HR department on a separate, confidential form.

Prior to the selection process beginning, managers will examine all selection criteria to ensure that they are related to the job requirement and are not unlawfully discriminatory.

If an applicant is uncertain about the purpose of any question they might believe to be intrusive, they should ask for clarification before feeling any need to respond. The company shall not insist on professional qualifications other than those necessary for the job. In assessing qualifications, overseas diplomas or degrees will be reviewed in line with UK equivalents. Wherever possible, experience may count as an equivalent to professional qualifications.

The company cannot lawfully discriminate in the selection of employees for recruitment or promotion, but the company may use appropriate lawful methods, including lawful positive action, to address the under representation of any group which the company identifies as being under represented in particular types of job.

All appointments will be made solely on merit, in accordance with this policy.

5.7 Learning & development

The company's learning & development programmes will be designed to support the aims of this policy. Stereotyping, prejudice or any other form of discrimination will be eliminated from internal courses and the selection of external courses.

The criteria for selecting employees for training opportunities must be non-discriminatory. These will be based on the individual's merits and abilities, business needs and the availability of work-related courses. Whenever practical, training will be arranged so that all categories of employees are able to attend.

5.8 Redundancy and redeployment

The selection for redundancy and/or redeployment must be conducted in a manner that avoids any direct or indirect discrimination.

Specific statutory protection applies to individuals who are either pregnant, on maternity

leave or nursing mothers.

5.9 Customers, suppliers and other people not employed by the company

The company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the company.

Employees should report any bullying or harassment by customers, suppliers, visitors or others to their manager who will take appropriate action.

5.10 Equal opportunities monitoring

The company will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and also the number of people with disabilities within these groups. It will consider and take any appropriate action to address any problems which may be identified as a result of the monitoring process.

5.11 Training & awareness of this policy

The company will provide training in equal opportunities and diversity to managers and others likely to be involved in recruitment or other decision making where equal opportunities and diversity issues are likely to arise.

The company will provide information to all existing and new employees and others engaged to work for the company to help them understand their rights and responsibilities under the Equal Opportunities Policy and Harassment & Bullying Policy, including what they can do to help create a working environment conducive to equal opportunities and free of harassment and bullying.

This information is provided in the Employee Handbook and through access to this and related policies and procedures.

5.12 Outside the work place

This policy is not restricted simply to the 'normal place of work'. It applies equally to company organised functions, company functions/meetings, business trips, visits to suppliers, or any situation where you are representing the company etc. All employees should ensure therefore that their behaviour complies with the sentiments of this policy in all work-related activities.

5.13 Consequences of breaching this policy

The company takes an extremely serious view of any behavior deemed to breach this policy. It is regarded as gross misconduct and, subject to a thorough investigation and the implementation of the company's Disciplinary Policy, could lead to dismissal without notice.

5.13.1 Procedure to be followed

- There is no specific procedure to be followed in respect of this policy. However should any employee feel discriminated against in any way, they should exercise their right to invoke the company's grievance procedure
- The only exception to this is in the event of any form of harassment or bullying and a separate procedure is outlined in the Harassment & Bullying Policy
- The company will take any complaint seriously and will seek to resolve any grievance which it upholds.

Individuals will not be penalised for raising a grievance, even if their grievance is not upheld, unless their complaint is untrue and/or made in bad faith.

5.14 Monitoring and review

This policy will be monitored periodically by the company to judge its effectiveness and will be updated in accordance with changes in the law.

In particular, the company will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups. It will review its activity in accordance with the results shown by the monitoring. If changes are required, the company will implement them.

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be managed in accordance with current data protection legislation.

6. Responsibility

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions. They must understand that this policy is also incorporated into their terms and conditions of employment.

Individual managers are responsible for ensuring that this policy is applied within their own area. Any queries on the application or interpretation of this policy must be discussed with the HR department prior to any action being taken.

The HR department has the responsibility for ensuring the maintenance, regular review and updating of this policy. Revisions, amendments or alterations to the policy can only be implemented following consideration and approval by the HR Director.