SIPRAL

# Organizational Regulation
# 0-01-09
# Equal Opportunity Code

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| Valid from<br>23.06.2017 | Last Revison No. 3<br>01.04.2020 |

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# Amendments

| date of change | processed by | characteristics |
|---|---|---|
| 24.6.2018 | Čaučíková | Review; Sipral changed for Sipral companies |
| 13.8.2019 | Gieslová | Review |
| 1.4.2020 | Pánková | Extending the applicability to LBSH a.s. |
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# 1 General Provisions

### 1.1 Aim

The Equal Opportunity Code is a policy that defines the standards of behavior and conduct that should be respected through all activities which the company operates in.

### 1.2 Activity

The Equal Opportunity Code is intended as a message to all persons involved inside and outside the companies SIPRAL a.s., SIPRAL UK Ltd. and LBSH a.s. (hereinafter "Sipral companies").

It is strictly binding to all representatives of the companies (i.e. companies' employees, and business partners who act on behalf of the companies).

# 2 Policy Statement

Sipral companies are an equal opportunity employer and are fully committed to a policy of treating all of our employees and job applicants equally. Sipral companies will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, and selection for redundancy and dismissal.

Management will take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including color, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the "protected characteristics". Sipral companies will appoint, train, develop and promote on the basis of merit and ability alone.

Management will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment and bullying based upon age, disability, gender reassignment, race (including color, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the "anti-harassment protected characteristics".

All employees are responsible for conducting themselves in accordance with this policy. Sipral companies will not condone or tolerate any form of harassment, whether engaged in by our employees or by outside third parties who work on behalf of Sipral companies, such as contractors and suppliers. Employees and third parties who work on behalf of Sipral companies must ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under Sipral companies' disciplinary procedure if an above mentioned employee or person is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of this equal opportunities policy statement will be treated as gross misconduct and could result in summary dismissal. Sipral companies will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against our employees.
Any employee and third party working on behalf of Sipral companies should draw the attention of nearest line manager to suspected discriminatory acts or practices or suspected cases of bullying or

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harassment. An employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment must not be victimized. Such behavior will be treated as gross misconduct under Sipral companies' disciplinary procedure.

**2.1. Direct Discrimination**

Direct discrimination occurs when, because of one of the "protected characteristics", a job applicant or an employee is treated less favorably than other job applicants or employees are treated or would be treated. The treatment will still amount to direct discrimination even if it is based on the "protected characteristic" of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own "protected characteristic". In addition, it can include cases where it is perceived that a job applicant or an employee has a particular "protected characteristic" when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavorable reference for a reason related to one of the "protected characteristics".

Management will take all reasonable steps to eliminate direct discrimination in all aspects of employment.

**2.2. Indirect Discrimination**

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a "protected characteristic" of the job applicant's or employee's. A PCP is discriminatory in relation to a "protected characteristic" of the job applicant's or employee's if:

- It is applied, or would be applied, to persons with whom the job applicant or employee does not share the "protected characteristic",
- The PCP puts, or would put, persons with whom the job applicant or employee shares the "protected characteristic" at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it,
- It puts, or would put, the job applicant or employee at that disadvantage, and it cannot be shown by Sipral companies to be a proportionate means of achieving a legitimate aim.

Management will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

**2.3. Victimisation**

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination or they have given evidence in connection with discrimination proceedings brought by another employee.

However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith.

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Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavorable reference because the former employee has done one of the protected acts set out above.

Management will take all reasonable steps to eliminate victimisation in all aspects of employment.

**2.4. Recruitment, Advertising and Selection**

The recruitment process is conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. Sipral companies are committed to applying equal opportunities policy at all stages of recruitment and selection.

Advertisements aim to positively encourage applications from all suitably qualified people. When advertising job vacancies, in order to attract applications from all sections of the community, Sipral companies, as far as reasonably practicable:

- ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular "protected characteristic";
- avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of people with a particular "protected characteristic".

Where vacancies may be filled by promotion or transfer, they are published to all eligible employees in such a way that they do not restrict applications from employees with a particular "protected characteristic".

However, where, having regard to the nature and context of the work, having a particular "protected characteristic" is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, Sipral companies will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection process must be carried out consistently for all jobs at all levels. All applications are processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates is clearly informed of the selection criteria and of the need for their consistent application. Person specifications and job descriptions are limited to those requirements that are necessary for the effective performance of the job.

Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff is based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, Sipral companies have regard to their duty to make reasonable adjustments to work provisions, criteria or practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this must be discussed objectively, without detailed questions based on assumptions about any of the "protected characteristics".

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### 2.5. Training and Promotion

Sipral companies will train all line managers in this policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices or acts of harassment or bullying. Line managers will be responsible for ensure they actively promote equal opportunity within the departments for which they are responsible.

Sipral companies also provide training to all employees to understand their rights and responsibilities in relation to equal opportunities and dignity at work and what they can do to create a work environment that is free of discrimination, bullying and harassment.

Where a promotional system is in operation, it is no discriminatory and it is checked from time to time to assess how it is working in practice. When a group of workers who predominantly have a particular "protected characteristic" appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

### 2.6. Terms of employment, Benefits, Facilities and Services

All terms of employment, benefits, facilities and service are reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the "protected characteristics".

### 2.7. Equal Pay and Equality of Terms

Sipral companies are committed to equal pay and equality of terms in employment. We believe our male and female employees should receive equal pay for like work, work rated as equivalent or work of equal value. In order to achieve this, Sipral companies endeavor to maintain a pay system that is transparent, free from bias and based on objective criteria.

### 2.8. Monitoring Equal Opportunity and Dignity at Work

Sipral companies regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of our working practices. If changes are required, management will implement them. Sipral companies are also making reasonable adjustments to our standard working practices to overcome substantial disadvantages caused by disability.

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## 3 Sipral Companies Values

Here are basic values in the field of equal opportunities and dignity at work that Sipral companies stand for and need to communicate to all their employees and third parties that work on behalf of Sipral companies.

**„Each project is unique, each project is a challenge..."**

... to have open communication within working environment and with stakeholders.

... to provide equal opportunities for all future and present employees and business partners.

... to ensure equal terms for all employees and partners.

... to reject any form of psychological and physical coercion.

... to adhere to the highest standards of ethics and fairness of business.

... to comply with legal and other requirements to which Sipral has committed.

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