

The Company recognises the benefits of a diverse workforce and is committed to providing a working environment that is free from discrimination. The Company will seek to promote the principles of equality and diversity in all its dealings with employees, workers, job applicants, clients, customers, suppliers, contractors, recruitment agencies and the public. Everyone who acts on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise.

Entitlements and responsibilities

Unlawful discrimination of any kind in the working environment will not be tolerated and the Company will take all necessary action to prevent its occurrence. Direct Discrimination occurs when a person is treated less favourably than another person in the same circumstances. Indirect Discrimination occurs when a provision, criterion or practice is applied, which disadvantages people of a particular group and which is not justified as a proportionate means of achieving a legitimate end.

Specifically, the Company aims to ensure that no employee, worker or job applicant is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. This commitment applies to all aspects of employment, including:

- recruitment and selection, including advertisements, job descriptions, interview and selection procedures
- training
- promotion and career-development opportunities
- terms and conditions of employment, and access to employment-related benefits and facilities
- grievance handling and the application of disciplinary procedures
- selection for redundancy

Equal opportunities practice is developing constantly as social attitudes and legislation change. The Company will review all policies and implement necessary changes where these could improve equality of opportunity.

The Company is concerned that all its employees are free to perform their work without harassment/sexual harassment from other staff members or from any other source. For further details please refer to the Personal Harassment Policy.

Working Hours

The Company will comply with the applicable laws and industry standards on working hours.

Equal pay

Men and women doing equal work and work rated as of equal value are entitled to equal pay.

Freedom of Association

The Company accepts the rights of all employees to belong, or not to belong, to a recognized Trade Union of the employee's choice.

Harsh or Inhumane Treatment

The Company prohibits verbal, physical, mental or emotional abuse, harassment, physical, mental or emotional coercion or the threat or perceived threat of any of the above.

Career development

While positive measures may be taken to encourage under-represented groups to apply for employment opportunities, recruitment or promotion to all jobs will be based solely on merit.

Everyone will have equal access to training and other career-development opportunities appropriate to their experience and abilities.

However, the Company will take appropriate positive action measures (as permitted by equal opportunities legislation) to provide specialist training and support for groups that are under-represented in the workforce and encourage them to take up training and career-development opportunities.

Genuine Occupational Qualifications

The imposition of a condition or requirement which has an adverse impact on someone, which because of an individual's sex, race or marital status makes them more likely to be affected by it, may not always be unlawful if it can be justified on grounds of genuine business need. Such examples are limited to Genuine Occupational Qualifications, which can be justified on the grounds of physiological, authenticity, decency/privacy, personal service or statutory authority reasons. Before any such imposition of conditions or requirements are introduced the Human Resource Department must be consulted.

The Employment Equality (Sexual Orientation) Regulations

The Sexual Orientation Regulations apply to discrimination on the grounds of orientation towards persons of the same sex, the opposite sex and the same and opposite sex. They also cover discrimination on the grounds of perceived as well as actual sexual orientation and being discriminated against on grounds of the sexual orientation of those with whom you associate. As a consequence, the Company categorically states that insults/discrimination based upon perceived or actual sexual orientation will not be tolerated and anyone caught harassing another member of staff in this way will be subject to disciplinary action.

The Employment Equality (Religion or Belief) Regulations

The Religion or Belief Regulations apply to discrimination on grounds of religion, religious belief or similar philosophical belief. Similar to the Sexual Orientation Regulations, they also cover discrimination on the grounds of perceived as well as actual religion or belief and being discriminated against on grounds of the religion or belief of those with whom you associate. As a consequence, the Company categorically states that insults/discrimination based upon perceived or actual religion, religious belief or similar philosophical belief will not be tolerated and anyone caught harassing another member of staff in this way will be subject to disciplinary action.

The Age Discrimination Regulations

The Age Discrimination regulations apply to discrimination on the grounds of age. Managers who discriminate on this basis are likely to exclude a group of people whose talents and skills may be necessary to the future success of our organisation. The forthcoming legislation however, will preclude discrimination on the grounds of age and as a consequence the Company is adopting a zero-tolerance approach to age discrimination in advance of the implementation of the legislation. In line with the above forms of discrimination, insults/discrimination based upon age will not be tolerated and anyone caught harassing another member of staff in this way will be subject to disciplinary action.

Child Labour

Premier does not employ child labour and, where such information can be relied upon, will avoid the use of suppliers of goods and services from organizations that do employ child labour. Minimum employment age laws are complied with in all respects.

Forced Labour

Premier does not use forced labour and, where such information can be relied upon, will avoid the use of suppliers of goods and services from organizations that do employ forced labour. No personnel are required to lodge "deposits" or identity papers, passports, etc as a condition of employment by Premier.

Managing Diversity

The Company is committed to valuing and promoting diversity in all areas of employment and to providing an inclusive working environment where everyone feels valued and respected, irrespective of their race, gender, marital/civil partnership status, age, disability, religion or belief, colour, national origin or sexual orientation. We recognise that people from different backgrounds with different experiences and abilities can bring fresh ideas and innovations to improve our working practices and business. Encouraging staff diversity also makes it more interesting for employees. This benefits employee productivity and retention, leading to lower recruitment and training costs.

Managing diversity is a more effective way of dealing with equal opportunities issues. It emphasises the business and personal benefits that accrue from valuing the differences between people, rather than just complying with the law.

This policy is designed to prevent discrimination and to attract the best employees. To ensure that diversity is embedded in our company culture, reflected in our staff and to better serve our customers/clients, the company will endeavour to:

- attract applications from all sections of society irrespective of race, gender, marital/civil partnership status, age
- disability, religion or belief, colour, national origin or sexual orientation and ensure fair treatment throughout the recruitment process in accordance with the company's Recruitment Policy
- improve performance in the job, develop skills and prepare all individuals for other roles and responsibilities through effective appraisal and training procedures in accordance with the company's Appraisal Policy
- ensure that employment decisions are based on business needs and the individual's ability to do a job
- enhance decision-making and innovation by encouraging interaction and involvement
- increase our ability to relate to existing and potential customers/clients wherever they exist
- identify the various behaviours and barriers that discrimination can take, and understand the negative effect these can have on the company and its employees and customers/clients
- train managers and employees in key decision-making areas on the potentially discriminatory effects of imposing practices, conditions, and criteria on minority groups, and the importance of being able to justify decisions
- monitor the application of this policy, and work towards eliminating any discriminatory practices which may be limiting the company's ability to achieve its objectives

Complaints of discrimination

The Company will treat seriously all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties and will take action where appropriate.

If you believe that you have been discriminated against, you are encouraged to raise the matter as soon as possible with your manager or other senior manager using the Company's Grievance Procedure (outlined elsewhere in the Employee Handbook).

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you make an allegation of discrimination, the Company is committed to ensuring that you are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures.

Victimisation occurs when a person is treated less favourably because of something that they have done under or in connection with the Regulations i.e. made a formal complaint of discrimination. Such action is unlawful, in the same way that direct and indirect discrimination is and the Company is concerned that all its employees are free to perform their work without fear of such victimisation either from other staff members or from any other source.

Investigating accusations of unlawful discrimination

If you are accused of unlawful discrimination, the Company will investigate the matter fully.

During the course of the investigation, you will be given the opportunity to respond to the allegation and provide an explanation of your actions.

If the investigation concludes that the claim is false or malicious, the complainant may be subject to disciplinary action.

If the investigation concludes that your actions amount to unlawful discrimination, you will be subject to disciplinary action, up to and including dismissal without notice for gross misconduct.

Monitoring

The Company may carry out monitoring for the purposes of measuring the effectiveness of its equal opportunities and diversity policy. The company will maintain records of the age, race, gender, marital/civil partnership status, and disability of job applicants and existing employees. Any patterns of under representation (for example, where one gender or race appears to have a consistently reduced chance of promotion) will be fully investigated and any discriminatory practices identified and eliminated.

Roberto Fiorentino
Managing Director
January 2022