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**POLICY DOCUMENT**

**Equal Opportunities and Dignity at Work Policy**

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## Table of Contents

1.	BACKGROUND AND PURPOSE .....	2
2.	AUDIENCE.....	2
3.	POLICY STATEMENT .....	2
4.	KEY PRINCIPLES.....	3
5.	APPLYING THE PRINCIPLES .....	3
5.1.	DEFINITIONS.....	3
5.1.1.	Protected Characteristics .....	3
5.1.2.	Direct Discrimination .....	4
5.1.3.	Indirect Discrimination.....	4
5.1.4.	Association.....	4
5.1.5.	Perception.....	4
5.1.6.	Bullying .....	4
5.1.7.	Harassment .....	5
5.1.8.	Victimisation .....	6
5.1.9.	Reasonable Adjustments .....	7
6.	COMPANY RESPONSIBILITIES .....	7
7.	RELEVANT PERSONS' RESPONSIBILITIES.....	7
7.1.	AS AN INDIVIDUAL.....	7
7.2.	AS A MANAGER .....	8
8.	DEALING WITH ALLEGED DISCRIMINATION, HARASSMENT OR BULLYING.....	8
8.1.	INFORMAL STEPS .....	8
8.2.	FORMAL STEPS .....	9
8.2.1.	Formal Complaint .....	9
8.2.2.	Formal Investigations.....	9
8.3.	WHISTLEBLOWING.....	9
9.	ROLES AND RESPONSIBILITIES .....	9
10.	REVIEWS AND UPDATES.....	10
11.	REFERENCES TO ASSOCIATED DOCUMENTS .....	10

## 1. BACKGROUND AND PURPOSE

This Equal Opportunities and Dignity at Work Policy for Catena Media Plc. (the “**Company**”) and its subsidiaries (jointly referred to as the “**Catena Group**”) has been developed to ensure that the Catena Group is in compliance with applicable laws and regulations and that the Group’s values and desired ways of conducting business are communicated and followed throughout the entire organisation. The Group has developed a number of governing documents, the Code of Conduct Policy, the HR Policy, and this policy which outlines the Group’s principles on equal opportunities and the way equality best practices are implemented throughout the Group.

The Policy covers 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. It also applies to work-related functions held outside of normal working hours, either on or off the Groups premises, such as conferences and fairs, training and lectures or learning and development activities, staff parties, leaving celebrations, working lunches etc.

## 2. AUDIENCE

This Policy applies to all directors, employees (including interns, apprentices, trainees and third party hired), independent contractors, founders on earn-out and other similarly contracted workers (collectively known as “**Relevant Persons**”).

## 3. POLICY STATEMENT

The Catena Group believes in equal opportunities for employment, training, and career advancement. The fundamental principle is equal pay for equal work, regardless of gender identity or expression. We strive for an equal distribution of men and women throughout the organisation.

The Catena Group is an equal opportunity employer, committed to providing a safe and respectful work environment, where everyone is treated with respect and dignity. All relevant persons have a responsibility of safeguarding and upholding the guidelines articulated in this policy in any situation related to employment, including work-related events and conferences etcetera. The Catena Group will do so by ensuring that any decision is made on the basis of predefined criteria such as business requirements, personal aptitude, skills, experience, qualifications and personality as fitting the specific role, where applicable.

## 4. KEY PRINCIPLES

The Catena Group is committed to providing equal opportunities in employment and avoiding unlawful discrimination in employment and against customers. The Group is committed to creating a harmonious working environment, free from discrimination, harassment and bullying in which every Relevant Persons are treated with respect and dignity. We are committed to ensuring that individuals are not less favourably treated because of, but not limited to, their religious belief, political opinion, gender, marital status, sexual orientation, race, age, disability or due to pregnancy and maternity or paternity.

The Catena Group will not tolerate discrimination, bullying or harassment of any kind. All allegations of discrimination, bullying or harassment will be investigated and, if appropriate, disciplinary action will be taken. The Group will also not tolerate victimisation of a person for making allegations of discrimination, bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

In addition to this, the Catena Group is committed to ensuring respect, fairness and integrity for all Relevant Persons and customers. The damage, tension and conflict that harassment and bullying creates should not be underestimated. The result is not just poor morale, but higher staff turnover, reduced productivity, divided teams, poor service and poor product quality.

This policy is intended to inform Relevant Persons about the type of behaviour that is unacceptable and provide Relevant Persons with a means of redress as well as assisting the Catena Group to put this commitment into practice. Compliance with this policy should also ensure that Relevant Persons do not commit unlawful acts of discrimination, bullying, harassment and victimisation.

## 5. APPLYING THE PRINCIPLES

The Catena Group is committed to creating a work environment free of harassment and bullying where everyone is treated fairly and with dignity and respect.

### 5.1. DEFINITIONS

#### 5.1.1. Protected Characteristics

The protected characteristics for the jurisdictions in which we operate include but are not limited to;

- Age
- Disability<sup>i</sup>
- Gender reassignment
- Marriage and civil partnership
- Pregnancy
- Racial or ethnic origin

- Religion or belief
- Sex
- Sexual orientation

### **5.1.2. Direct Discrimination**

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

### **5.1.3. Indirect Discrimination**

Indirect discrimination is where a condition, rule, policy or practice that is applied to everyone that particularly disadvantages individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

### **5.1.4. Association**

It is unlawful to discriminate against or harass an individual for association with another individual who has a protected characteristic (other than marriage and civil partnership). For example denying a Relevant Person a promotion because she is taking care of a disabled relative and the manager thinks she will not have any time for new duties would be associative discrimination. Harassing a Relevant Person because his brother is gay would be unlawful as associative harassment.

### **5.1.5. Perception**

It is unlawful to discriminate against or harass any individual based on a perception (either rightly or wrongly) that he or she has a particular protected characteristic (other than marriage and civil partnership, pregnancy and maternity). For example, if a Relevant Person is discriminated against, bullied or harassed because their colleagues believe they are homosexual they may have a claim for perceptive discrimination or harassment even if they are not homosexual.

### **5.1.6. Bullying**

Bullying is a sustained form of psychological abuse that aims to make victims feel demeaned and inadequate. It is defined as "offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, which has the purpose, or effect of, intimidating, belittling or humiliating the recipient, leading to loss of self-esteem for the victim and ultimately the self-questioning of their worth, both in the workplace and society as a whole".

Workplace bullying can range from extreme forms such as violence and intimidation to less obvious actions like deliberately ignoring someone at work.

These can be split into two categories:

- Obvious bullying, examples include:
- Shouting or swearing at people in public and private
- Ignoring or deliberately excluding people
- Persecution through threats and instilling fear
- Spreading malicious rumours
- Constantly undervaluing effort
- Dispensing disciplinary action which is totally unjustified
- Spontaneous rages, often over trivial matters

Less obvious bullying examples include:

- Withholding information or supplying incorrect information
- Deliberately sabotaging or impeding work performance
- Constantly changing targets
- Setting individuals up to fail by imposing impossible deadlines
- Removing areas of responsibility and imposing menial tasks
- Blocking applications for holiday, promotion or training.

This list is not exhaustive. The actions listed must be viewed in terms of the distress they cause the individual. It is the perceptions of the recipient that determines whether any action or statement can be viewed as bullying.

### **5.1.7. Harassment**

Harassment is unwanted conduct related to:

- relevant protected characteristics, (other than marriage and civil partnership, pregnancy and maternity),
- nationality or national origin, employment status (e.g. part time or full time, agency worker, fixed term worker, contractor etc.)
- political beliefs
- physical characteristics
- deeply held personal beliefs / criminal record / health / willingness to challenge harassment - being ridiculed or victimised for raising a complaint

that either intentionally or unintentionally violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive environment for that person.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Each person has the right to decide what behaviour is either acceptable or unacceptable and he or she feels damaged by it, then that individual has every right to say so, and his or her right to do so will be respected. Where it cannot be established that there was an intention to offend, conduct will be regarded as violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, if taking all the circumstances into account, particularly including the recipient's views, it would be reasonable to come to that conclusion.

Harassment is normally characterised by more than one incident of unacceptable behaviour, particularly if it recurs once it has been made clear that it is regarded by the victim as offensive. However, just one incident may constitute harassment if it is sufficiently serious.

As harassment takes many forms, Relevant Persons may not always realise that their behaviour constitutes harassment, but they must recognise that what is acceptable to one Relevant Person may not be acceptable to another - determining what is acceptable is an individual right that we must all respect.

Examples of harassment include (but are not restricted to):

- Verbal harassment - examples include crude language, open hostility, offensive jokes, suggestive remarks, innuendoes, rude or vulgar comments, malicious gossip and offensive songs or making insulting gender-based remarks.
- Non-verbal harassment - examples include wolf-whistles, obscene gestures, sexually suggestive posters/calendars, pornographic material (both paper-based and generated on a computer, including offensive screensavers), graffiti, offensive letters, offensive e-mails, text messages on mobile phones and offensive objects.
- Physical harassment - examples include unnecessary touching, patting, pinching, or brushing against another Relevant Persons body, intimidating behaviour, assault and physical coercion.
- Coercion - examples include pressure for sexual favours (e.g. to get a job or promotion) and pressure to participate in political, religious or trade union groups, etc.
- Intrusion - examples include stalking, pestering, spying etc.

### **5.1.8. Victimisation**

Victimisation is subjecting a person to detriment because he/she has, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing him/her or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because he/she has made a complaint or giving him/her a heavier or more difficult workload.

Provided that a Relevant Persons acts in good faith, i.e. they genuinely believe that what they are saying is true, they have a right not to be victimised for making a complaint or doing anything in relation to a complaint of bullying or harassment and the Catena Group will take appropriate

action to deal with any alleged victimisation, which may include disciplinary action against anyone found to have been guilty of victimisation .

Making a complaint that a Relevant Person knows to be untrue, or giving evidence that a Relevant Person knows to be untrue, may lead to disciplinary action being taken.

### **5.1.9. Reasonable Adjustments**

The duty to make reasonable adjustments aims to make sure that disabled people, as far as is reasonable, have the same access to everything that is involved in getting and doing a job or accessing services as a non-disabled person.

It includes the removal, adaptation or alteration of physical features and/or providing extra support for a disabled worker, job candidate or customer. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

## **6. COMPANY RESPONSIBILITIES**

The Catena Group takes acts of discrimination, bullying and harassment very seriously. The Catena Group will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. 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 and personal or home commitments will not form the basis of employment decisions except where necessary.

The Catena Group will make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

## **7. RELEVANT PERSONS' RESPONSIBILITIES**

### **7.1. AS AN INDIVIDUAL**

Every Relevant Person has a personal responsibility for the implementation of the policy and every Relevant Person is required to assist the Catena Group to meet its commitment to create and maintain a working environment that respects the dignity of all workers and provide equal opportunities in employment and avoid unlawful discrimination.

All Relevant Persons should be aware of the serious and genuine problems which discrimination, harassment and bullying can cause and should ensure that colleagues are treated with dignity and respect. Relevant Persons' behaviour should be beyond question and must not be



considered in any way discriminatory, or construed as bullying or harassment. Relevant Persons should discourage such behaviour by making it clear that they find it unacceptable and support colleagues if they are experiencing discrimination, bullying or harassment and are considering making a complaint. Relevant Persons should alert a Manager and/or Human Resources to any incidents to enable the Catena Group to deal with such matters.

## 7.2. AS A MANAGER

Managers have a responsibility to ensure that discrimination, harassment or bullying does not occur in work areas for which they are responsible.

Managers also have a responsibility to inform their employees of the Catena Group's policy and take steps to positively promote it. They will be responsive and supportive to any member of staff who makes a complaint, provide full and clear advice on the procedure to be adopted, maintain confidentiality in all cases and ensure that there is no further problem or any victimisation after a complaint has been resolved.

## 8. DEALING WITH ALLEGED DISCRIMINATION, HARASSMENT OR BULLYING

Any Relevant Persons who suspect or are a victim of a potential breach of this Policy can report such matters in any of the ways detailed below.

All reports will be investigated as appropriate and operated with due regard for privacy of the individual and in line with the principles outlined in the Company's Data Protection Policy and kept confidential, unless such communications must be made available to a law or enforcement agency or other public authority based on a legal obligation or to establish or defend the Company's or an individual's rights.

No Relevant Persons acting in good faith will be subject to disciplinary measures for providing information regarding suspected violations of law or company policy.

### 8.1. INFORMAL STEPS

If any of the Relevant Persons are being harassed or bullied, they should consider whether to raise the problem informally with the person responsible. They should explain clearly to the person concerned that their behaviour is not welcome or makes them feel uncomfortable. If this is too difficult or embarrassing or if for any other reason the Relevant Person does not feel comfortable providing such information to the person responsible, they should speak to their line manager **OR** the Human Resources Department, who can provide confidential advice and assistance in resolving the issue formally or informally.

If a Relevant Person is not certain whether an incident or series of incidents amounts to bullying or harassment, they should initially contact their line manager **OR** the Human Resources Department informally for confidential advice.

If informal steps are not appropriate, or have been unsuccessful, a Relevant Person should follow the formal procedure set out below.

## 8.2. FORMAL STEPS

### 8.2.1. Formal Complaint

If a Relevant Person wishes to make a formal complaint about bullying or **harassment**, they should submit it in writing to the Chief Human Resources Officer, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned.

The written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the **harassment** or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to the Relevant Person. However, the Catena Group have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, the Group consider it appropriate to do so.

### 8.2.2. Formal Investigations

The Group will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

## 8.3. WHISTLEBLOWING

Relevant Persons also have the possibility of submitting a complaint through the Company's Whistleblowing tool. The Whistleblowing tool can be accessed on the company intranet site [here](#).

## 9. ROLES AND RESPONSIBILTIES

All Relevant Persons are individually responsible for ensuring their adherence to this Policy.

The Chief Human Resources Officer is responsible for reviewing and updating this Policy.

The CEO is the overall owner of this Policy.

## 10. REVIEWS AND UPDATES

The Equal Opportunities and Dignity at Work Policy shall be reviewed, updated and adopted when deemed necessary or appropriate, however, no less than annually.

The The Equal Opportunities and Dignity at Work Policy shall be reviewed and updated by the Chief Human Resources Officer and adopted by the Board of Directors.

## 11. REFERENCES TO ASSOCIATED DOCUMENTS

- [Code of Conduct Policy](#)
- [Human Resource Policy](#)

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<sup>i</sup> A physical or mental impairment that has a 'substantial' and 'long-term' negative effect on an employee's ability to do normal daily activities.