



## Equal Opportunities, Diversity and Prevention of Workplace Bullying/Harassment (including Sexual Harassment) Policy Statement

The CA Group Of Companies is an equal opportunities employer and our policy - to which all CA Group Operating Companies are fully committed - is to treat all job applicants and Employees (whether part time, full time or temporary) equally, in the same manner, fairly and with dignity and respect irrespective of gender, gender reassignment, age, nationality, ethnicity, disability, belief, marital status, pregnancy/maternity and sexual orientation.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. We recognise that encouraging all employees to develop their full potential in order that the talents and resources of the workforce are fully utilised to maximise the efficiency of the organisation makes sound business sense.

We recognise that: -

- Equal opportunity can only result from good employment practices.
- Our Employees are our most valuable asset and must be protected and their value effectively put to best use.
- Company Officers and all Employees share responsibility for the implementation of this policy.
- The Company will not discriminate on the grounds of gender, gender reassignment, marital status, nationality, ethnicity, skin colour, religious/other belief, disability, age or any other grounds prohibited by legislation. This commitment also applies to areas not covered by legislation.
- This policy applies to the recruitment process and appointment to jobs. It also applies to other aspects of employment such as conditions of work, pay and training.
- This policy applies equally to our dealings with customers, clients and other third parties.
- Any Employee may use the company grievance procedures to complain about discrimination, harassment or bullying and will not be penalised for such complaints providing they are made sincerely and in good faith. In the case of serious harassment, then an Employee may raise the matter directly with James Amos, Managing Director, or with Kim Flood, Company Secretary. For the avoidance of doubt **the term 'Harassment' where used in this Policy Statement includes, without limitation, sexual harassment.**
- Any documentation or records relating to the implementation of the policy which this Statement supports will be used for that purpose only.
- CA Group requires all Employees to behave responsibly and comply with this policy by not indulging in or tolerating unacceptable behaviour, maintaining privacy during investigations and immediately reporting incidents of discrimination, harassment or bullying of any sort to HR, or a Manager or an Officer of the Company.
- Managers and Supervisors must take reasonable steps to ensure that Employees are not exposed to discrimination, harassment or bullying. Managers and Officers are required to lead by example: personally demonstrating appropriate behaviour, promoting workplace harassment and bullying prevention policies and guidelines, treating any and all complaints seriously and confidentially and ensuring that where a person lodges, or is witness to a complaint they are not victimised.

In order to achieve the intent and objectives of this policy, the Company will: -

- Monitor the inclusivity, equality and safety of the workforce regularly; considering whether the policy is achieving its objectives and determining whether action is necessary. If any inequality comes to light, the Company will ensure that positive steps are taken to remedy the situation.
- Ensure that any employee who appears or is reported to have treated another employee or a third party in a manner which is unlawful and/or not in accordance with this policy will undergo investigation and where appropriate, disciplinary action according to the Company's disciplinary procedure. Any such behaviour is likely to be considered serious misconduct at the very least; and may constitute gross misconduct resulting in summary dismissal.
- Ensure compliance with the Equality Act 2010, as amended: including without limitation by The Worker Protection (Amendment of Equality Act 2010) Act 2023.

CA Group has a confidential complaint handling system which includes procedures for reporting, investigating, resolving and appealing discrimination harassment and bullying complaints.

- Any report of discrimination harassment or bullying will be treated with the utmost seriousness and investigated promptly, fairly and impartially. A person making a complaint and/or who is a witness to workplace harassment or bullying will not be victimised.



Consequences Of Breach Of Policy: -

- Disciplinary action will be taken against any person who discriminates against, harasses or bullies a worker or who victimises a person who has made or is a witness to a complaint.
- Where an allegation of discrimination, harassment or bullying is upheld following a Disciplinary Hearing and any Appeal, this will constitute serious or gross misconduct and may result in dismissal with or without notice or pay in lieu of notice.
- Where any complaint of alleged discrimination, harassment or bullying is found to have been made maliciously, frivolously or vexatiously, a disciplinary procedure will be commenced which - following an investigation and hearing (and any Appeal) - will result in a disciplinary sanction up to and including dismissal with or without notice or pay in lieu of notice.

THIS STATEMENT AND THE POLICY WHICH IT SUPPORTS WILL BE REVIEWED ON AN ANNUAL BASIS

**James Amos**  
Managing Director  
The CA Group Of Companies

21<sup>st</sup> May 2025

Note. Without limitation the following form the legal basis for the Policy which this Statement refers:

Equal Pay Act 1970 (Equal Value Amendment 1984)  
Rehabilitation of Offenders Act 1974  
Sex Discrimination Act 1975 (Gender Reassignment Regulations 1999)  
Race Relations Act 1976  
Disability Discrimination Act 1995  
The Protection from Harassment Act 1997  
Race Relations (Amendment) Act 2000  
Race Relations Act 1976 (Amendment) Regulations 2003  
Employment Equality (Sexual Orientation) Regulations 2003  
Employment Equality (Religion or Belief) Regulations 2003  
Disability Discrimination Act 2005  
Employment Equality (Age) Regulations 2006  
Equality Act 2010  
Worker Protection (Amendment of Equality Act 2010) Act 2023