

HERITAGE ENVELOPES EQUALITY POLICY

The purpose of this policy is to set out our objectives in trying to eliminate any discrimination that exists within the Company. Our aim is to provide equal treatment for all existing employees, potential employees, suppliers and customer to ensure no-one is treated any less favourably on the grounds on gender, disability, racial or national origin, marital status, sexual orientation, religion, colour, creed, age (up to 65), part time workers or trade union membership.

Our aim is to provide a work environment that is free from any intimidation, hostility, humiliation and any other form of harassment. This policy confirms our commitment to providing a fair and just society for all employees and visitors alike. All staff of Heritage Envelopes, regardless of their status, are required to observe the provisions of the Policy.

The provisions of this policy relate to:

- All temporary and permanent employees
- Job applicants for any position
- Visitors to the company (Suppliers and Customers)
- Recruitment and promotions
- Training and Development
- Redundancy and Redeployment
- Disciplinary/Capability
- Grievance/Disputes.

Heritage Envelopes are committed to equality of opportunity and treatment in all its employment practices, policies and procedures.

To this end, within the framework of the law and best practice, we are committed, wherever practicable, to recruiting and maintaining a work force which broadly reflects the local catchment area within which we operate. In order to attract application from the wider community, we will advertise all vacancies in the local press and the local jobcentres. We are committed to creating a work environment which is free from all forms of harassment and unlawful and unfair discrimination. The following sections of the policy provide more detail on each of the areas.

Marital Status

No person will be discriminated against due to their marital status. We believe in giving any person an opportunity, providing they have the ability, experience and if necessary the qualifications for the position.

Sexual Orientation

The Company recognises that a person's sexual orientation does not determine their job performance. Therefore, a person's sexual orientation, if known, will not be a consideration during recruitment, or the course of employment. Neither will it be a principle reason for dismissal.

Religion

The Company will ensure that no person will be treated less favourably on the grounds of religious belief or political opinion. In addition, whenever reasonable practicable, the Company will be flexible on all of its sites of operation, to accommodate requests for time off from staff which related to their religious observance.

Disability

Disability is defined as: 'a physical or mental impairment which has long term effects i.e. it has lasted for at least 12 months, or it can be expected to last at least 12 months'. We believe in extending common courtesies to disabled colleagues rather than through compassion and don't make assumptions about their capabilities.

Sex Discrimination

No person will be treated less favourably on the grounds of their sex/gender, during their application for employment with the Company or, during the course of their employment. Nor will their sex determine their dismissal from the Company's employment. No staff will be treated less favourably because they have brought proceedings, or given evidence or information, under the Sex Discrimination Act.

Race

No person will be treated less favourably on the grounds of their race, nationality, creed, ethnic origin or colour, during their application for employment with the Company or during the course of their employment. Neither will it determine their dismissal from the Company's employment. Heritage Envelopes welcome applications from all minority groups and all ethnic backgrounds. All applications will be treated on an equal basis and the position will be offered to the best person for the job regardless of ethnic origin or colour.

Staff will not be treated less favourably because they have brought proceedings or given evidence or information under the Race Relations Act. All staff will conduct themselves in a manner and use language which is not racially offensive to any person. The Company will take very seriously any racially offensive behaviour and will treat it as a disciplinary matter which may result in dismissal of the offender.

Age

Age will only be a consideration where the investment that is to be placed in a person e.g. training, is in excess of the contribution that the employee will be able to make prior to retirement. The Company believes that a person's age does not determine their job performance or their ability to learn and therefore will not apply any age constraints on employees' opportunities. We believe they can offer maturity and knowledge and can adapt to change.

Trade Union Status

No person will be treated less favourably on the grounds of their trade union status, during an application for employment with the Company, during the course of their employment or in determining their dismissal from the Company's employment.

Bullying at Work

The Company regards bullying as harassment and therefore it is covered under the provisions of this Policy.

Equal Pay

The Company will ensure that where men and women are doing 'like work' and the jobs are rated as equivalent, that equal remuneration and benefits are available.

A job evaluation system is used to evaluate all posts within the organisation. This system is free from both direct and indirect discrimination. Heritage Envelopes Pension Scheme provides equal benefits for men and women, in respect of service. Equal access into the Scheme has been available to all staff. The Company will always ensure that its pension scheme meets with legislative requirements.

Ex-Offenders

When a person is imprisoned for a criminal offence, the length of the prison sentence determines when that person has to declare their conviction. Where a person has a criminal record which is 'spent', this information will not be utilised by the Company and it will be viewed that the person has not committed, been charged with, prosecuted for, convicted of or sentenced for the offence. As any criminal sentences of two and a half years or more, are never spent under the terms of the Rehabilitation of Offenders Act, this information will be taken into account by the Company.

Sexual Harassment

All staff will conduct themselves in a manner and use language which is not sexually offensive to any person.

RESPONSIBILITIES

The Operations Director is responsible for the overall responsibility for implementing the policy and ensuring that all staff involved in employment procedures receive training in the application of this policy to ensure they are aware of its contents and provisions.

Monitoring

To ensure direct or indirect discrimination/victimisation/harassment is not occurring we will maintain and regularly review the employment records of all employees in order to monitor the progress of this policy. Monitoring will involve the collection and classification of information regarding the gender, ethnic/national origin and any disability of all current employees, applicants and the success rate of applicants.

The results will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.

All employees must:

- co-operate with any measures introduced to ensure equality of opportunity
- report any suspected discriminatory acts or practices.

REDRESS

Any member of staff who feels they have been discriminated against under the terms of this policy has the right and is encouraged to pursue their grievance through the Grievance Procedure.

If staff prefer they can raise their grievance, in the first instance, with Personnel Department, in the strictest confidence.

In addition, staff may seek confidential advice from the Personnel Department or any member of the Workers Committee.

Any breach of this Equality Opportunity Policy will be classed as gross misconduct which will be dealt with via the Disciplinary Procedure and may result in their summary dismissal from the company.

Signed

A handwritten signature in black ink, appearing to read 'D. Sears', written in a cursive style.

DAVID SEARS

Position Managing Director

Date 18th July 2002