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EQUAL OPPORTUNITIES POLICY

A. Statement of policy and purpose of policy

1. CliniSciences Group recognizes that we live in a society where discrimination still operates to the disadvantage of many groups in society.
2. CliniSciences Group believes that all persons should have equal rights to recognition of their human dignity, and to have equal opportunities to be educated, to work, receive services and to participate in society.
3. CliniSciences Group is committed to the promotion of equal opportunities within all subsidiaries, and affiliated organizations, through the way we manage the organization and provide services to the community. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness and equality in the workplace.
4. The objective of this policy is that no person should suffer or experience less favorable treatment, discrimination or lack of opportunities on the grounds of gender, race, color, nationality, ethnic origin, religious or philosophical beliefs, health status, HIV status, age, marital status, parental status, sexual orientation, political beliefs or trade union membership, class, responsibility for dependents, physical attributes, ex-offender status as defined by the Rehabilitation of Offenders Act 1974, lack of formal qualifications where such qualifications are not formally required, or any other grounds which cannot be shown to be justifiable within the context of this policy (referred to as **Protected Characteristics**).
5. This policy will influence and affect every aspect of activities carried out at CliniSciences Group i.e. promotional work, educational services, casework and other functions linked to CliniSciences Group, as determined by the management committee.
6. In the provision of services and the employment of staff, CliniSciences Group is committed to promoting equal opportunities for everyone. Throughout its activities, CliniSciences Group will treat all people equally whether they are:

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- Seeking or using our services
- Applying for a job or already employed by us
- Trainee workers and students on work experience or placements
- Volunteer workers

B. How the policy will be implemented and who is responsible?

1. Achieving an equal opportunities workplace is a collective task shared between the Employer and all staff. This policy and the rules contained in it therefore apply to all staff of the Employer irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed-term staff and any volunteers or interns (referred to as **Staff**).

2. All staff has personal responsibility to ensure compliance with this policy, to treat colleagues with dignity at all times and not to discriminate against or harass other members of Staff, visitors, clients, customers, suppliers and former staff members. In addition, Staff who take part in management, recruitment, selection, promotion, training and other aspects of career development (referred to as **Managers**) have special responsibility for leading by example and ensuring compliance.

3. Management has specific responsibility for the effective implementation of this policy. Each head of department also has responsibilities and we expect all our employees to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy, we shall:

- Communicate the policy to employees, job applicants, volunteers and relevant others
- Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff
- Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in nondiscriminatory selection techniques
- Incorporate equal opportunity notices into general communications practices
- Ensure that adequate resources are made available to fulfill the objectives of the policy

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4. Managers must take all necessary steps to:

- promote the objective of equal opportunities and the values set out in this policy;
- ensure that their own behavior and that of the staff they manage fully comply with this policy;
- ensure that any complaints of discrimination, victimization or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded.

C. Conduct and general standards of behavior

All staff and volunteers are expected to conduct themselves in a professional and considerate manner at all times. CliniSciences Group will not tolerate behavior such as:

- making threats
- physical violence
- shouting
- swearing at others
- persistent rudeness
- isolating, ignoring or refusing to work with certain people
- telling offensive jokes or name calling
- displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format
- any other forms of harassment or victimization.

The items on the above list of unacceptable behaviors are considered to be disciplinary offences within CliniSciences Group and can lead to disciplinary action being taken. CliniSciences Group does, however, encourage staff to resolve misunderstandings and problems informally wherever possible, depending on the circumstances. However, whether dealt with informally or formally, it is important for staff who may have caused offence to understand that it is no defense to say that they did not intend to do so, or to blame individuals for being over sensitive. It is the impact of the behavior, rather than the intent, that counts, and that should shape the

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solution found both to the immediate problem and to preventing further similar problems in the future.

D. Complaints of discrimination

Discrimination occurs in different ways, some more obvious than others. Discrimination on the grounds of any of the Protected Characteristics is prohibited by law, even if unintentional, unless a particular exception applies.

Direct discrimination

Direct Discrimination is less favorable treatment because of one of the Protected Characteristics. Examples would include refusing a woman a job as a chauffeur because you believe that women are not good drivers or restricting recruitment to persons under 40 because you want to have a young and dynamic workforce.

Indirect discrimination

Indirect discrimination arises when an employer applies an apparently neutral provision, criterion or practice which in fact puts individuals with a particular Protected Characteristic at a disadvantage, statistically and this is unjustified. To show discrimination the individual complaining also has to be personally disadvantaged. An example would be a requirement for job candidates to have ten years' experience in a particular role, since this will be harder for young people to satisfy. This kind of discrimination is unlawful unless it is a proportionate means of achieving a legitimate aim.

Harassment

Harassment is:

- unwanted conduct which is related to a Protected Characteristic and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them: or
- unwanted conduct which is of a sexual nature and which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them (Sexual Harassment); or

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- less favorable treatment because of the rejection of or the submission to sexual harassment.

CliniSciences Group will treat seriously all complaints of unlawful discrimination (direct or indirect) on any forbidden grounds made by employees, trustees, clients or other third parties and will take action where appropriate.

All complaints will be investigated in accordance with the organization’s disciplinary procedure, as appropriate and the complainant will be informed of the outcome in line with these procedures.

We will also monitor the number and outcomes of complaints of discrimination made by staff, volunteers, clients and other third parties.

E. Legal Obligations

1. Equal Opportunities and Discrimination (Equality Act 2010)

The new Equality Act came into force in October 2010 and replaces all previous equality legislation in England, Scotland and Wales – namely the Race Relations Act 1976, the Disability Discrimination Act 1995, the Sex Discrimination Act, the Equal Pay Act, the Employment Equality (Age) Regulations 2006, The Civil Partnership Act 2004, the Employment Equality Regulations 2003 (religions and belief and sexual orientation).

2. The Equality Act 2010 protected characteristics like: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief sex and sexual orientation.

In valuing diversity CliniSciences Group is committed to go beyond the legal minimum regarding equality.

The Equality Act 2010 harmonizes and strengthens and replaces most previous equality legislation. The following legislation is still relevant:

- The Human Rights Act 1998.
- The Work and Families Act 2006.
- Employment Equal Treatment Framework Directive 2000 (as amended).

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F. Recruitment and selection

1. The recruitment and selection process are crucially important to any equal opportunities policy. We will endeavor through appropriate training to ensure that employees or partner companies, making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.
2. Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.
3. Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.
4. We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.
5. All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do their job.
6. Short-listing and interviewing will be carried out by more than one person where possible.
7. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.
8. Selection decisions will not be influenced by any perceived prejudices of other staff.

G. Monitoring

We will monitor the employment records of all company employees to see if the results of the recruited staff reflect the diversity of the society.

H. What to do if you encounter discrimination

1. Every member of Staff has a responsibility to combat discrimination if they encounter it. Staff who observe or are aware of acts that they believe amount to discrimination directed at others are encouraged to report these using employee_care@clinisciences.com.
2. The above email is intended for this purpose and can only be viewed by the CEO of CliniSciences Group.

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In case of any concern regarding the recipient of the mail, please direct your request or complaint privately directly to the Chief Scientific Officer (CSO) of the Group.

3. Any report raised about discrimination will be kept confidential so far as this is practicable. We may ask you if you wish your complaint(s) to be put to the alleged discriminator if disciplinary action appears to be appropriate. It sometimes may be necessary to disclose the complaint or take action even if this is not in line with your wishes, but we will seek to protect you from victimization and, if you wish, we will seek to protect your identity. You should be aware that disciplinary action may be impossible without your co-operation or if you refuse to allow relevant information to be disclosed.

4. Staff who raise a complaint about or report discrimination in good faith will be protected from retaliation or victimization. As long as you act in good faith, the fact that you have raised a complaint or report will not affect your position within the Employer, even if the complaint is not upheld. Making a false allegation deliberately and in bad faith is a misconduct offence and will be dealt with in accordance with our disciplinary policy. Any member of Staff who attempts acts of retaliation or victimization may be subject to disciplinary action up to and including summary dismissal for gross misconduct.

5. If you make a complaint, it may be necessary to ask you to stay at home on paid leave while investigations are being conducted and the matter is being dealt with through the appropriate procedure. This may particularly be necessary in cases of alleged harassment.

I. Non-compliance with equal opportunities rules

1. Any breach of equal opportunities rules or failure to comply with this policy will be taken very seriously and is likely to result in disciplinary action against the offender, up to and including immediate dismissal.

2. Staff should also note that:

- in some cases, they may be personally liable for their acts of discrimination and that legal action may be taken against them directly by the victim of any discrimination;
and

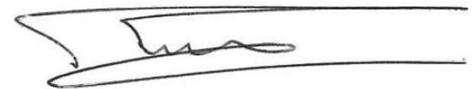
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- it may be a criminal offence intentionally to harass another employee.

J. Review of this policy

Results of any monitoring procedure 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.

CliniSciences Group will revise and review this policy biannually.



Tushendan RASIAH
CEO of CliniSciences Group