



Procedure: Equality and Diversity

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Equal Opportunities and Diversity Statement

Sparrows Offshore Group Limited ('the Group') is a global organisation, employing thousands of employees across the globe. Our diverse workforce has allowed us to drive growth and success across our global operations. We are committed to promoting equality and diversity and promoting a culture that actively values differences and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.

We are dedicated to encouraging a supportive and inclusive culture across our workforce and eliminating any form of discrimination from our workplaces. We seek to develop working environments, across our globe that treats all employees as individuals, fairly and in a consistent way.

I encourage you to promote a culture of respect and dignity, and challenge discrimination, should it ever arise.

As a group, we will continue to encourage, support and demonstrate equality as part of our everyday activities, roles and interactions.

Stewart Mitchell
CEO

1 Purpose

This policy sets out Sparrows Group approach to equality and diversity and the commitment to preventing prejudice and inequality by:

- Promoting equality in the workplace as good management practice throughout employment including recruitment and selection, learning and development, work life balance and equal pay;
- Creating a positive supportive working environment for all employees in which their differences and contributions are recognised and valued;
- Creating an environment that promotes dignity and respect;
- Encouraging anyone who feels they have been subjected to any form of discrimination to raise their concerns so corrective action can be taken;
- Regularly reviewing all our employment practices so that fairness is maintained always.

2 Scope

Throughout this policy, the terms “the Company,” “the Group,” “we” and “us” are used, which refer to Sparrows Offshore Group Limited and all subsidiaries and affiliated companies.

This policy applies to all employees, regardless of business structure or geographic location, and all employees of Sparrows Group are to comply with principles in this policy.

Subcontractors and third parties/temporary workers are also expected to adhere to the standards of behaviour outlined in this policy.

3 Definition

Sparrows Group will not tolerate any form of unlawful or unfair discrimination, and will work within the spirit and the best practise of the UK Equality Act (2010). The UK Equality Act (2010) prohibits discrimination on the basis that an employee holds one or more of the defined ‘protected characteristics’:

- Age
- Disability
- Sex
- Sexual Orientation
- Gender Reassignment
- Race
- Religious Belief
- Marriage or Civil Partnership
- Pregnancy and Maternity

For the purposes of this policy and its implementation across all subsidiaries and affiliated companies, across the globe, the Group will adopt the best practice of UK Equality Act (2010) and apply this to all our global workplaces to encourage equality and diversity, and prevent discrimination of any form.

4 Discrimination

For the purposes of this policy, we refer to discrimination as being any employee or group of employees who are being directly or indirectly discriminated against for any reason, due to 'protected characteristics'

The main types of discrimination are known as:

Direct Discrimination - refers to situations where someone is treated less favorably because they possess one or more of the 'protected characteristics' or they are close to someone with a 'protected characteristics'. This can include a friend, relative or colleague.

Indirect Discrimination – can refer to a policy, procedure or practice that applies to everyone but can disadvantage certain people on the basis they have one or more of the 'protected characteristics'.

Discrimination by Association – refers to situations when someone is treated less favourably because someone in their life (for example, family or friends) have protected characteristics.

Harassment - is unwanted conduct which is related to one or more of the 'protected characteristics'. This often has the purpose to intimidate, humiliate or degrade another person.

Victimization - Victimization broadly refers to bad treatment directed towards someone who has made or is believed to have made or supported a complaint.

5 Responsibilities

Employees have a responsibility to act and behave in a way that is in accordance with this policy. This includes but is not limited to:

- treating others with dignity and respect;
- taking account of their own behaviour and being aware of the effects it has on others;
- recognising and respecting the needs and backgrounds of colleagues and customers;
- ensuring that they do not discriminate, intimidate or harass others;
- report any suspected discrimination, victimisation and harassment to Line Managers.

Line Managers responsible for the implementation and management of this policy which includes:

- ensuring that all subordinates are aware of the policy and the expected standards of behavior.
- ensuring that all subordinates act in accordance with this policy and addressing any issues immediately;
- act as a role model for the expected standards of behavior;
- ensure that offensive or potentially offensive material is not displayed in the workplace, and that inappropriate language is avoided
- effectively treat all subordinates in a fair and consistent manner;
- report any breaches to this policy to the HR department immediately.

The Human Resources team will ensure:

- the appropriate training and advise is provided to managers on the application of this policy;
- promote equality and diversity in the creation of other employment policies and procedures;
- support investigations relating to potential breaches of this policy;
- advise and guide managers on the fair application of this policy and any other associated policies;
- monitor and review this policy every year.

6 Application and Monitoring

6.1 Recruitment and Selection

The Group are committed to equal opportunities, and job applicants from all backgrounds are welcomed from all who believe they fit the essential requirements of the job. The selection of candidates will be based on aptitude and ability for the role, and the Group ensure that those involved in the recruitment process have appropriate training in the company's recruitment procedure to ensure equal and fair treatment throughout. The Recruitment Policy HR10P1 is designed to promote equal opportunity during the recruitment process and protect job applicants and current employees against discrimination.

6.2 Promotion

We are committed to developing our people, and allowing them to thrive and reach their full potential. All promotion decisions are made on the basis of ability and merit, which are assessed against objective and measurable job-related criteria and the needs of the business unit. In accordance with our Recruitment Policy HR10P1, we are committed to identifying talent within own business, and as such we operate a fair and structured succession planning programmes across the globe, as part of the holistic approach to workforce planning, and as such there may be occasions where job adverts are lawfully not advertised.

6.3 Learning and Development

All employees are encouraged to invest in their development and consider opportunities to develop their competencies and skills, considering a broad range of learning and development options in the Company. In accordance with the company's Managing Performance process HR13, Line Managers are also responsible for the development of their employee, which includes setting goals and creating a development plan to address any skill or knowledge gaps. Line Managers will fairly and consistently apply this best practise to all employees providing them with an opportunity to develop, regardless of any 'protected characteristic'.

6.4 Work Life Balance

The Group are aware of the importance of work life balance for employees and the benefits of actively promoting it within our business. We have a framework of policies and local legislation in place across the globe which are available to all employees. The company are committed to employees who have commitments outside of work and will not discriminate those that choose to benefit from these policies.

6.5 Equal Pay

All terms and conditions and policies relating to pay and benefits are done in a non-discriminatory manner, and are applied fairly and consistently, regardless of any 'protected characteristics' or gender. This is managed and monitored by having a single set of terms and conditions per region for each job role. This ensures that terms and conditions are applied fairly to any new and existing employees regardless of their gender or age. In the United Kingdom, the Company have a legal obligation to report on gender pay, to eliminate any gender pay gaps, and as such, monitors the application of pay and benefits fairly across our regions.

7 Breaches

Proven acts of discrimination will be treated in accordance with the Company's Disciplinary Policy, or in accordance with country specific legislation.

8 Additional Information

No policy can cover all eventualities. Any questions in relation to this policy or the application of the policy should be directed to your HR Representative.