

BBA Aviation

**EQUAL OPPORTUNITIES AND
ANTI-HARASSMENT GUIDELINES**

April 2008

Introduction

The purpose of these Equal Opportunities and Anti-Harassment guidelines from the BBA Aviation group of companies ("Group") is twofold: firstly, to alert the management of Group companies to the importance of ensuring that policies have been/are adopted on these matters and, secondly, to serve as a checklist, for each Human Resources/Personnel Department, of the principal features which should be considered for incorporation into its policies.

It is in the best interests of BBA Aviation as a whole that all Group companies treat their employees, job applicants, temporary or agency staff and contract labour fairly. It is the responsibility of every company within the Group, through its Human Resources/Personnel Department, to ensure that appropriate Equal Opportunities and Anti-Harassment policies are adopted, and to encourage all its employees, agents, suppliers, agency staff and contactors to comply with them.

All managers and supervisors should ensure fair treatment by understanding and complying with the Equal Opportunities and Anti-Harassment policies of their particular Group company. To assist in this, the Human Resources/Personnel Department of each Group company is responsible for the provision of advice and training to managers and supervisors on the implementation of these policies. Whilst managers and supervisors have a particular responsibility for implementation and promotion of the policies, all employees are required to comply with them. Consideration should therefore be given to the provision of equal opportunities awareness training for all staff. Where it is the case, employees should be reminded that under the relevant legislation they may be personally liable for any acts of discrimination or harassment which they commit.

The guidelines set out below are in no way to be regarded as a substitute for the adoption by each Group company of its own Equal Opportunities and Anti-Harassment policies. The Human Resources Department of each Group company should ensure that its Equal Opportunities and Anti-Harassment policies comply with local domestic laws. In addition, Group company policies should not contradict these guidelines, except to the extent specifically required by applicable local law. If clarification is required, Group HR and the BBA Aviation Legal Department should be consulted.

Equal Opportunities Guidelines

- BBA Aviation requires all Group companies to have a policy in place which aims to ensure that no employee, job applicant, temporary or agency staff, contract labour or other worker unlawfully receives less favourable treatment or consideration on the grounds of race, colour, religion/belief, age, nationality, ethnic or national origin, gender, marital or civil status, gender reassignment, sexual orientation or disability. All employees, including those of part time or fixed term status, should be treated fairly and with respect.
- Such a policy should apply to:
 - advertisement of jobs;
 - recruitment;
 - appointments;
 - access to training and development;
 - promotion;
 - conditions of work;
 - pay and all other aspects of employment.
- Managers and supervisors involved in recruitment, development, training and promotion of employees, or setting terms and conditions of engagement must request clarification from their Human Resources Department if they have any doubts about the application of these policies to those activities.
- Individuals who believe that they may have been discriminated against should be encouraged to use the grievance procedure of the relevant Group company to make their complaint. It is important that individuals feel able to raise such grievances and are not subject to any form of retaliation for raising such a grievance, giving evidence in connection with that grievance, or supporting those who bring grievances, unless they do so maliciously or in bad faith.
- All grievance procedures must include a commitment by the company's management to investigate grievances in a fair, objective and expedient manner. In certain jurisdictions (e.g. US and the UK), failure to conduct such investigations may implicate the company and/or its management.
- The Group company in question should take disciplinary action against any employee who is found to have committed any acts of unlawful discrimination.

Serious breaches of the policy of any Group company should be treated as gross misconduct which could result in instant dismissal. Sanctions should also be put in place, where possible, in respect of any other worker who commits an act of unlawful discrimination.

Compliance with Appropriate Equal Opportunities Laws

- Each company within the Group must comply fully with the relevant law applicable to it in relation to equal opportunity employment.
- Please consult Group HR and the BBA Aviation Legal Department if you require advice on the requirements of such law.

Anti-Harassment and Bullying Guidelines

- BBA Aviation also requires all Group companies to have in place an Anti-Harassment and Bullying policy as it is the aim of BBA Aviation that harassment and bullying at any of the Group companies be prevented.
- Harassment is any unwanted conduct which causes discomfort or upset to an individual and which has an adverse effect on working and/or personal relationships. It creates an intimidating, hostile or humiliating work environment for the individual.
- Bullying can be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.
- Employees must recognise that some people may be offended by conduct which they and others consider acceptable. All employees should be required to behave in a way that does not cause offence to others.
- The Group company concerned should ensure that their policy applies not only to interaction whilst working at the Company's premises and those of any customer, client or contact, but extends to all other activities in the course of employment including time spent traveling, away from home whilst on business, on training courses, conferences and social events with colleagues.

- Employees should be reminded that harassment or bullying may be an isolated incident or be a persistent course of conduct. It may occur in written communications, email, text or by phone, as well as face to face. It may be by an individual against an individual or involve groups of people.
- By way of example only, the following may amount to harassment or bullying:-
 - Unwanted physical contact whether or not of a sexual nature.
 - Unwanted suggestions, comments or gestures whether or not of a sexual nature.
 - Insults, inappropriate statements, comments or "jokes"
 - Threats or insults.
 - Isolation and exclusion at work.
 - Display of offensive material or publication of offensive graffiti.
 - Unfair work allocation or responsibilities.
 - Copying memos that are critical about someone to others who do not need to know.
 - Overbearing supervision or other misuse of power or position.
- Any employees found to have participated in, encouraged or condoned harassment or bullying, or who have engaged in retaliatory conduct, should be subject to disciplinary action in accordance with the disciplinary procedure of the individual Group company. Any other worker who has behaved in this way should be subjected to a sanction so far as possible.
- The Group company concerned should consider each case on an individual basis. However, harassment or bullying should normally amount to gross misconduct justifying summary dismissal.
- Furthermore, harassment or bullying may be unlawful discrimination and in certain cases, may also be a criminal matter.
- It is important that each Group company provides a fair and effective way of dealing with any complaints of harassment or bullying. In this regard, the Human Resources/Personnel Department of each Group company must ensure that a harassment and bullying complaints procedure is incorporated into its Anti-Harassment and Bullying policy. Such a procedure should outline the steps an employee should take if he or she feels they have been or are being harassed or

bullied and how each complaint will be dealt with. In addition the procedure must include the company's commitment to a fair, objective and expedient investigation of each complaint.

Monitoring

- The Managing Director of each Group company is responsible for ensuring that managers, supervisors and all employees are provided with information relating to the above policies and for ensuring that employment matters are monitored to ensure that the company complies with its policies. It is advisable that regular reviews into all aspects of such guidelines are undertaken to identify any trends or patterns emerging and, if so, to analyse whether or not these are justified
- Group HR and the BBA Legal Department should be consulted with any questions resulting from these guidelines.
- The Managing Director of each Group company should also ensure that the effectiveness of its equal opportunities and anti-harassment and bullying guidelines is monitored and that any appropriate adjustments are made as soon as possible.

Compliance

Compliance with these Guidelines will be treated in the same manner as other BBA Aviation-wide policies. All Managing Directors will be required to sign a disclosure statement twice each year (mid-year and year-end) acknowledging their receipt of a copy of these Guidelines; their dissemination of the Guidelines to their direct reports; and their disclosure of any known violations of the Guidelines, to the extent not previously reported as required under the Guidelines.

These Guidelines and compliance with them will be the subject of review as part of the BBA Aviation Internal Audit Programme.