



**EQUAL OPPORTUNITIES  
AND ANTI-HARASSMENT  
GUIDELINES**

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## **Introduction**

The purpose of these Equal Opportunities and Anti-Harassment guidelines from BBA Aviation is twofold: firstly, to alert the management of BBA 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 incorporated into its policies.

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

Furthermore, all managers and supervisors should ensure equal treatment by understanding and complying with the Equal Opportunities and Anti-Harassment policies of their particular BBA company. To assist in this, the Human Resources/Personnel Department of each BBA 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 the implementation of this policy, all employees are required to ensure that the policy is maintained and implemented. 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 BBA company of its own Equal Opportunities and Anti-Harassment policies. The Human Resources Department of each BBA company should ensure that its Equal Opportunities and Anti-Harassment policies do not contradict these guidelines, except to the extent specifically required by applicable local law. If clarification is required, BBA Legal should be consulted.

## **Equal Opportunities Guidelines**

- BBA Aviation requires all BBA companies to have a policy in place to ensure that no employee job applicant, temporary or agency staff or contract labour receives less favourable treatment or consideration on the grounds of race, colour, religion/belief, age, nationality, ethnic origin, sex, marital status/belief, parental responsibilities, part time or fixed term status, sexual orientation or disability.

- 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 the recruitment, development, training and promotion of employees must request clarification from their Human Resources Department if they have any doubts about the application of their policy.
- Employees who believe that they may have been discriminated against may use the grievance procedure of their BBA company to make their complaint. It is important that employees feel able to raise such grievances and will not be subject to any form of retaliation for raising such a grievance unless it is made 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), failure to conduct such investigations may implicate the company and/or its management.
- The BBA 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 BBA company are to be treated as gross misconduct which could result in instant dismissal.

**Compliance with Appropriate  
Equal Opportunities Laws**

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

## Anti-Harassment Guidelines

- BBA Aviation also requires all BBA companies to have in place an Anti-Harassment policy as it is the aim of BBA Aviation that harassment at any of the BBA companies be prevented.
- Harassment (including bullying) is any unwanted conduct in relation to race, colour, nationality, ethnic origin, sex, religion/belief, age, marital status, gender re-assignment or transexualism, parental responsibilities, part time or fixed term status, sexual orientation or disability which an individual may consider objectionable.
- Employees must recognise that some employees may be offended by conduct which they and other employees consider acceptable. All employees are required to behave in a way that does not cause offence to others.
- The BBA 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 time spent traveling, away from home whilst on business, on training courses, conferences and social events with colleagues.
- Harassment may be an isolated incident or be a persistent course of conduct.
- By way of example only, the following may amount to harassment:-
  - 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.
- Any employees found to have participated in, encouraged or condoned harassment, or who have engaged in retaliatory conduct, will be subject to disciplinary action in accordance with the disciplinary procedure of the individual BBA company.

- The BBA company concerned will consider each case on an individual basis. However, harassment will normally amount to gross misconduct justifying summary dismissal.
- Furthermore, harassment will usually be unlawful discrimination and in certain cases, may also be a criminal matter.
- It is important that each BBA company provides a fair and effective way of dealing with any complaints of harassment. In this regard, the Human Resources/Personnel Department of each BBA company must ensure that a harassment complaints procedure is incorporated into its Anti-Harassment policy. Such a procedure will outline the steps an employee should take if he or she feels they have been or are being harassed 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 BBA company is responsible for providing managers, supervisors and all employees in general with information relating to the above policies and monitoring employment matters to ensure that each company in BBA complies with these policies.
- BBA Legal should be consulted with any questions resulting from these guidelines.
- The Managing Director of each BBA company should also monitor the effectiveness of the equal opportunities and anti-harassment guidelines. 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.