

Anti-discrimination and Harassment Policy

Issue No: 2.0

Created Date: 15/05/2023
Contact Officer: Matt Dawber (QHSE Manager)
Latest Revision: 15/05/2024 (2.0)
Review Date: 15/05/2025



Document Title	Document Type	Issue	Page
Anti-discrimination and Harassment Policy	Policy	2.0	2/3

1.0 Introduction

1.1 Purpose

Cliffe Packaging Ltd has a priority to create and maintain a working environment in which people are treated with decency and respect and, in line with our Code of Conduct, no employee should ever feel marginalised, oppressed, insulted, humiliated or sexually harassed. For that reason, Cliffe Packaging takes a zero-tolerance approach to discrimination or harassment of any form.

This policy outlines how Cliffe Packaging ensures its workplace remains free from discriminatory or harassing behaviour. Cliffe Packaging seeks to prevent, correct and discipline behaviour which contravenes this policy.

1.2 Scope

The scope of this policy includes all directors, managers and employees of Cliffe Packaging Ltd.

2.0 Objectives

The objectives of this policy are:

- To comply with relevant laws and regulations on discrimination and harassment.
- To ensure 100% of employees receive regular anti-discrimination and harassment training in 2024.
- Operate a zero-tolerance approach to behaviour which is threatening, abusive, oppressive, exploitative or sexual in nature, including language, gestures and physical acts.
- Provide equal treatment for all employees, whether temporary, part-time or full-time.
- Have zero reported cases of discriminatory or harassing behaviour in 2024.
- Deal appropriately with all reports of discriminatory or harassing behaviour.
- Ensure our supply chain remains free from discriminatory or coercive behaviour.
- Provide channels of reporting for cases of discrimination or harassment.

3.0 Controls and Measures

Cliffe Packaging endeavours to meet its anti-discrimination and harassment objectives with the following controls and measures:

- Implementation and communication of a Code of Conduct, which covers discriminatory and harassing behaviours, which employees must agree to follow as a term of their employment.
- The periodic attendance of an externally provided Discrimination and Harassment Awareness training course, which is provided by our third-party employment law specialists.
- Work closely with our third-party employment law specialists to ensure updates to legislation are communicated.
- Implementing a whistleblowing procedure and reporting methods to enable employees and stakeholders to report incidents of discrimination and harassment.
- Hire in line with our Recruitment Policy which is based on merit and free of discrimination.
- Implementation of a Supplier Code of Conduct and a Supplier Approval Process to ensure our supply partners operate the necessary policies and measures to ensure they align with this policy.
- Treat every incident or report with equal seriousness, carrying out an investigation as soon as possible.



Document Title	Document Type	Issue	Page
Anti-discrimination and Harassment Policy	Policy	2.0	3/3

4.0 Review and Approval

The HR Committee (including Company Secretary) has been appointed to oversee the implementation of this policy.

This policy is reviewed at least once annually by the board of directors with guidance from the QHSE Manager, is communicated internally and is made available publicly to all interested parties upon request.

Signed:

Date: 15/05/2024

Mr Philip Dawber

Managing Director