



DIVERSITY AND EQUAL OPPORTUNITIES POLICY

AUTHORISATION		
	Name / Function	Date
Prepared:	Jane Barker/Alasdair Robinson	22nd November 2018
Approved:	Board	4th December 2018



**Gulf Keystone Petroleum Limited (“GKP” or “the Company”)
Diversity and Equal Opportunities Policy (“the Policy”)**

Policy statement

The Company does not discriminate against workers or consultants on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age. The Company will also seek to accommodate the religious observations and beliefs of all workers and consultants. The principle of non-discrimination and equality of opportunity applies equally to the treatment of former workers, visitors, clients, customers and suppliers by members of the Company’s current workforce.

This policy deals with the specific categories of workers and consultants and areas of work which the Company has identified as potentially giving rise to equal opportunities issues and provides more specific guidance on the parameters of the Company’s policy and approach to equal opportunities.

All workers and consultants have a duty to act in accordance with this policy, and therefore to treat colleagues with dignity at all times, and not to discriminate against or harass other members of the workforce, whether junior or senior to them. In some situations, the Company may be at risk of being held responsible for the acts of individual members of the workforce and will not therefore tolerate any discriminatory practices or behaviour.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

The Company will at all times seek to comply with the principles on diversity enshrined in the UK Corporate Governance Code (July 2018).

Who is covered by the policy?

This policy covers all individuals working for GKP irrespective of their status, level or grade. It therefore includes all employees (full time, part-time and fixed-term) and consultants (collectively referred to as “the workforce” or “workers” in this policy).

Personnel responsible for implementation of the policy

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the Company’s aims and objectives with regard to equal opportunities.

All workers are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives. If they have any questions about the content or application of this policy, workers should contact the Human Resources (HR) Director.



Scope and purpose of the policy

This policy applies to the advertising of jobs and recruitment and selection, to training and development, opportunities for promotion, to conditions of service, benefits and facilities and pay, to health and safety and to conduct at work, to grievance and discipline procedures and to termination of employment, including redundancy.

The Company will take appropriate steps to accommodate the requirements of workers' religions, cultures, and domestic responsibilities.

Recruitment and selection

The Company aims to ensure that no job applicant receives less favourable treatment on any of the grounds detailed in the Policy Statement. The Company's recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are essential for the effective performance of the job and therefore justified on non-discriminatory grounds.

The Company takes steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, groups underrepresented in the organisation.

Specifically, the Company will consider the application of the Policy when involved in the selection of a Director to the Board of GKP.

In certain countries, GKP may have to comply with legislation or cultural practices which may contradict the Company's commitment to diversity or equal opportunities. The Company will work to mitigate any impact in such circumstances by considering alternatives such as recruitment in another position or location.

Staff training, promotion and conditions of service

Training needs will be identified through regular performance appraisals of the workforce. All workers will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

The composition and movement of workers at different levels will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or underrepresented groups.

The Company's conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.



Termination of employment

The Company will monitor redundancy criteria and procedures to ensure that they are fair and objective and are not directly or indirectly discriminatory.

The Company will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

Disability discrimination

If a worker is disabled or becomes disabled in the course of their employment with the Company, they are encouraged to tell the Company about their condition. This is to enable the Company to support them as much as possible. Workers may also wish to advise the HR Director of any reasonable adjustments to their working conditions or the duties of their job which they consider to be necessary, or which would assist them in the performance of their duties. The HR Director may wish to consult with the worker and with their medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of the worker's job. Nevertheless, there may be circumstances where it will not be reasonable for the Company to accommodate suggested adjustments and the Company will ensure that they provide the worker with information as to the basis of the Company's decision not to make any adjustments.

The Company will monitor the physical features of their premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other workers. Where possible and proportionate, the Company will take steps to improve access for disabled workers and service users.

Breaches of the policy

If a worker believes that they may have been discriminated or if a worker believes that they may have been subject to harassment, they may wish to raise the matter with the Company's HR Director.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with as a disciplinary offence.

Any member of the workforce who is found to have committed acts of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Company always takes a strict approach to serious breaches of this policy.