

Vaughandale Construction Ltd is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy, and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. The Company is committed to actively opposing all forms of discrimination.

The Company also aims to provide a service that does not discriminate against its clients and customers in how they can access the services and goods supplied by the Company. The Company believes that all employees and clients are entitled to be treated with respect and dignity.

All personal data used in connection with this Policy shall be collected, held, and processed in accordance with the Company's Data Protection Policy.

1. Definitions

1.1 Discrimination

In this policy 'discrimination' means discrimination where a person is treated less favourably on ground of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation.

1.2 Types of Discrimination

Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Indirect Discrimination

This is the application of a policy, criterion, or practice which the employer applies to all employees, but which is such that:

- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents.
- The employer cannot justify the need for the application of the policy on a neutral basis; and
- The person to whom the employer is applying it suffers detriment from the application of the policy.

Example: A requirement that all employees must be 6ft tall if that requirement is not justified by the position would indirectly discriminate against employees with an oriental ethnic origin, as they are less likely to be able to fulfil this requirement.

Harassment

This occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation

This occurs when a person is treated less favourably because they have brought or intend to bring proceedings, or they have given or intend to give evidence.

2. General Statement of Policy

The Company is an equal opportunity employer and is fully committed to a policy of treating all its employees and job applicants equally.

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. The Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.

All employees, Contractors, Sub-Contractors, or other 3rd parties engaged to work with the Company to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination or harassment. Action will be taken under the Company's disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation. Serious breaches of these equal opportunities and dignity at work statement will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination.

Employees should draw the attention of their line manager to suspected discriminatory acts or practices or suspected cases of harassment. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or harassment or who has provided information about such discrimination or harassment. Such behaviour will be treated as potential gross misconduct in accordance with the Company's disciplinary procedure.

3. Recruitment, Advertising and Selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of experience, abilities and qualifications. The Company is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable ensure advertisements are not confined to those publications, which would exclude or disproportionately reduce the numbers of applicants of a particular gender, sexual orientation, religion or racial group.

- 1) Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, sexual orientation, religion or racial group or which would exclude disabled job applicants.
- 2) Avoid prescribing any requirements as to marital status.
- 3) Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees of any particular gender, sexual orientation, religion or racial group or from employees with a disability.
- 4) Ensure that the setting of age limits as a criterion of any specific job is justifiable.

The selection process will be carried out consistently for all jobs at all levels. All applications will be processed in the same way. The staff responsible for short-listing, interviewing, and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application. Wherever possible, all applicants will be interviewed by at least two interviewers and all questions asked of the applicants will relate to the requirements of the job. The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work arrangements or to work premises to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled

4. Training & Promotion

The Company will train all Managers/Foreman in the Company's policy on equal opportunities and in helping them identify discriminatory acts or practices or acts of harassment or bullying. Line managers will be responsible for ensure they actively promote equal opportunity within the departments for which they are responsible.

The Company will raise awareness to all employees to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment free of bullying and harassment.

Where a promotional system is in operation, it will not be discriminatory, and it will be checked from time to time to assess how it is working in practice. When a group of workers predominantly of one race, religion, sex or sexual orientation or a worker with a disability appears to be excluded from access to promotion and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

5. Terms of Employment, Benefits, Facilities & Services

All terms of employment, benefits, facilities, and service will be reviewed from time to time, to ensure that there is no unlawful discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

6. Equal Pay

The Company is committed to equal pay in employment. It believes that their employees should receive equal pay for like work, work rated as equivalent or work of equal value. To achieve this,

the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

7. Harassment

It is against the Company's policy for any employee to sexually harass another employee or to harass them on the grounds of actual or perceived sexual orientation. It is also against the Company's policy for any employee to harass another employee on the grounds of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief or sex. Harassment occurs where a person engages in unwanted conduct, which has the purpose or effect of violating the other's dignity at work or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal or physical conduct of a sexual nature, subjection to obscene or other suggestive comments, and sexual jokes or pictures. Racial harassment includes, but is not limited to, engaging in unwelcome verbal or physical conduct of a racial nature, subjection to racist comments, and racist jokes or pictures. Harassment may comprise intentional bullying, which is obvious or violent, but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the complainant to decide for them what they regard as offensive.

Bullying

There is no legal definition of bullying and in reality, it can be similar to harassment in the effect that it may have on an individual, however, the focus of the behaviour need not be a protected characteristic.

It is likely to have a negative impact on the victim's confidence, self-esteem and overall wellbeing. Bullying is not necessarily overt and can be done using a number of different methods. It may take place with colleagues in public or in private, at work or socially.

Examples of bullying can include:

- shouting or swearing at someone
- persistent, excessive, unfair, or unjustified criticism
- public humiliation and/or insults
- persistent devaluing of a person's effort
- constant ignoring of opinions
- withholding necessary information without good reason to cause difficulty or embarrassment to an individual
- unjustified, excessive monitoring and/or supervision
- setting someone up to fail – for example, setting a target/objective that cannot be achieved
- constant changing of targets for no justifiable reason
- unreasonably blocking requests for leave
- aggressive communications
- intimidating or threatening behaviour.

8. Reporting Complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially, and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from members of a particular sex, sexual orientation, religion, or racial group or from employees who are disabled or pregnant.

With cases of harassment, while the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that their behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical.

If you wish to make a complaint of discrimination or harassment, you should follow the following steps:

- 1) First, report the incident of discrimination or harassment to your Line Manager/Foreman. If you do not wish to speak to your Line Manager/Foreman, you can instead speak to another Manager or a Director.
- 2) Such reports should be made promptly so that investigation may proceed, and any action taken expeditiously.
- 3) All allegations of harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the nature and details of the incident or complaint and the basis for it. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.
- 4) The Company will also invite you to attend at least one meeting at a reasonable time and place at which your complaint can be discussed. You should take all reasonable steps to attend that meeting and you have the right to be accompanied by either a trade union official or a fellow employee of your choice.
- 5) Once the investigation has been completed and after the meeting with you has taken place, you will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. You will also be notified in writing of your right to appeal against the Company's decision if you are not satisfied with it. The Company is committed to taking appropriate action with respect to all complaints of discrimination or harassment that are upheld.
- 6) If you wish to appeal against the Company's decision, you must do so in writing within five working days of the Company's decision. On receipt of an appeal, a more senior manager (who may not be the person to whom you addressed your appeal) shall make arrangements to hear your appeal at an appeal meeting. At that meeting you may again, if you wish, be accompanied by either a trade union official or a fellow employee of your choice. You should take all reasonable steps to attend the appeal meeting. Following the meeting, you will be informed in writing of the Company's final decision on your appeal.
- 7) You will not be penalised for raising a complaint of discrimination or harassment even if it is not upheld unless the complaint was both untrue and made in bad faith.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, Line Managers/Foremen who had knowledge that such discrimination or harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.

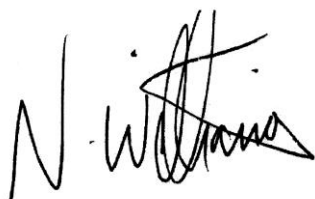
9. Monitoring Equal Opportunity & Dignity at Work

The Company will regularly monitor the effects of selection decisions and personnel and pay practices and procedures in order to assess whether equal opportunity and dignity at work are being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices.

10. Sub-Contractors

Sub-contractors are under a contractual obligation to honour the Vaughndale construction equal opportunities policy. It is the policy of Vaughndale construction that placement providers who discriminate in terms of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation towards trainees or towards their own employees will have their contract terminated immediately.

For Vaughndale Construction Ltd

A handwritten signature in black ink, appearing to read 'Noel Williams', with a stylized, overlapping flourish at the end.

Noel Williams
Managing Director

Date	Review
January 2023	January 2024