

Subject : Equality, Inclusion, and Diversity Policy			Doc. # : HR-P-003
Originator : Louise Workman, HR Manager	Orig. Date : 30/11/2025	Rev. Date : 30/11/2026	Version#: 5

EQUALITY, INCLUSION, AND DIVERSITY POLICY

1. Purpose

The success of our business depends on our people. We value the different perspectives, backgrounds, skills and experiences that individuals bring and recognise that an inclusive workplace supports innovation, problem solving, collaboration and employee engagement.

This policy sets out the Company's commitment to equality of opportunity, inclusion and diversity throughout the employment relationship and in our interactions with job applicants, workers and other people connected with the business.

2. Scope

This policy applies to all employees, directors, agency workers, contractors, consultants, temporary workers, job applicants, apprentices, visitors and any other person working for or on behalf of Pickstock Telford Ltd. It applies at all Company sites and to work-related activities, including training, travel, social events, online communications and interactions with customers, suppliers and other third parties.

3. Our Commitment

Pickstock Telford Ltd will seek to ensure that:

- All employees and potential employees are treated fairly, consistently and with respect at every stage of employment.
- Employment decisions are based on objective, job-related criteria, merit, skills, qualifications, conduct, performance and legitimate business requirements.
- No person is subjected to unlawful discrimination, harassment, sexual harassment, bullying, victimisation or retaliation.
- Employees have an equal opportunity to contribute, develop and achieve their potential.
- Training, development and promotion opportunities are accessible and allocated fairly.
- Requests for flexible working are considered fairly in accordance with the Flexible Working Policy and applicable law.
- Meetings and employee voice arrangements are organised so that participants have a fair opportunity to contribute and be heard.
- Employee Forums are open to employees through self-nomination or peer nomination, subject to the applicable forum arrangements.

4. Equality Act 2010 And Protected Characteristics

The Company will not unlawfully discriminate against anyone because of any of the protected characteristics recognised by the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race, including colour, nationality and ethnic or national origins
- Religion or belief

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- Sex
- Sexual orientation

Protection also applies where an individual is perceived to have a protected characteristic or is associated with someone who has a protected characteristic, where the law provides such protection.

5. Forms Of Unacceptable Conduct

5.1. Direct And Indirect Discrimination

Direct discrimination may occur where a person is treated less favourably because of a protected characteristic. Indirect discrimination may occur where a provision, criterion or practice applies to everyone but places people who share a protected characteristic at a particular disadvantage and cannot be objectively justified.

5.2. Harassment And Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is unwanted conduct of a sexual nature with that purpose or effect. The Company will take reasonable steps to prevent sexual harassment in the course of employment, including harassment by colleagues and third parties.

5.3. Victimisation And Retaliation

Victimisation or retaliation against a person because they have raised, supported or provided information in connection with an equality concern, complaint or legal right will not be tolerated.

5.4. Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or causes harm. Bullying may be verbal, physical, written, visual or online and may be a single serious incident or repeated behaviour.

6. Equality Throughout Employment

The principles in this policy apply to all stages of employment, including:

- Job design, advertising, recruitment and selection
- Terms and conditions, pay and benefits
- Induction, training and development
- Appraisal, performance management and promotion
- Flexible working and family-related leave
- Attendance, capability, disciplinary and grievance processes
- Redeployment, redundancy, termination and references

Recruitment, selection and promotion decisions will be based on fair and objective assessment against the requirements of the role. Any person involved in a decision must declare an actual or potential conflict of interest.

7. Disability, Health and Reasonable Adjustments

The Company is committed to removing or reducing substantial disadvantages experienced by disabled job applicants and employees. Reasonable adjustments will be considered in relation to recruitment, work arrangements, duties,

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communication, training, facilities and employment processes. Employees and applicants are encouraged to tell Human Resources or an appropriate manager if they require an adjustment. Requests will be considered individually, sensitively and in consultation with the person concerned.

We recognise that some disabilities and health conditions may be non-visible and that neurodivergent people may benefit from adjustments. No person will be required to disclose more information than is reasonably necessary to consider support, safety or an adjustment.

8. Inclusive Workplace Commitments

8.1. Sex, Gender and Family Responsibilities

- Challenge stereotypes and barriers that may affect opportunity or progression.
- Support employees in balancing work and personal responsibilities through relevant policies.
- Support employees during pregnancy and following maternity, paternity, adoption, shared parental or other family-related leave.
- Use objective and transparent criteria when reviewing pay, progression and access to opportunity.

8.2. Gender Reassignment And Trans Inclusion

People who propose to undergo, are undergoing or have undergone gender reassignment will be treated with dignity and respect. The Company will address discrimination, harassment, inappropriate disclosure of personal information and deliberate disrespectful behaviour. Individual support needs will be discussed sensitively and confidentially.

8.3. Race, Nationality And Culture

The Company values racial, national, ethnic and cultural diversity and will challenge prejudice, stereotyping and exclusion. Employment decisions will not be influenced by assumptions about a person's race, nationality, ethnic origin, language, accent or cultural background.

8.4. Religion Or Belief

Employees will be treated fairly regardless of religion, religious belief, philosophical belief or absence of belief. The Company will consider reasonable requests relating to religious observance, dress, facilities or working arrangements, while taking account of legal duties, food safety, health and safety and operational requirements.

8.5. Age

Employment decisions will not be based on assumptions about age. Training, development and progression will be available on fair and objective criteria, subject to any lawful age-related requirement.

8.6. Sexual Orientation, Marriage And Civil Partnership

Employees will be treated fairly regardless of sexual orientation, relationship status, marriage or civil partnership. Benefits, policies and workplace opportunities will be applied consistently in accordance with legal requirements.

8.7. Neurodiversity

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The Company recognises and values neurodiversity. Where appropriate, we will discuss and consider reasonable support or adjustments for neurodivergent applicants and employees, taking account of individual needs and the requirements of the role.

9. Responsibilities

9.1. Managing Director And Senior Leadership

- Provide visible leadership and support for the policy.
- Ensure appropriate resources, governance and oversight.
- Review relevant information and support corrective action where concerns or patterns are identified.

9.2. Managers And Supervisors

- Lead by example and promote respectful, inclusive behaviour.
- Apply employment policies and decisions fairly and consistently.
- Respond promptly to concerns and seek advice from Human Resources where appropriate.
- Consider reasonable adjustments and avoid assumptions about individual capability or circumstances.
- Ensure employees understand the standards expected of them.

9.3. Human Resources

- Provide advice, training and support on this policy.
- Support fair handling of concerns, complaints and employment processes.
- Monitor appropriate equality information and recommend improvements.
- Maintain records securely and in accordance with data protection requirements.

9.4. All Employees And Workers

- Treat colleagues and others with dignity and respect.
- Do not engage in discrimination, harassment, sexual harassment, bullying, victimisation or retaliation.
- Complete required training and follow this policy.
- Raise concerns promptly and co-operate honestly with any review or investigation.
- Challenge inappropriate behaviour where it is safe and appropriate to do so.

10. Raising A Concern Or Complaint

Anyone who believes they have experienced or witnessed conduct contrary to this policy should raise the matter as soon as reasonably practicable through one of the following routes:

- Their line manager or another appropriate manager
- Human Resources
- The Grievance Procedure
- The Whistleblowing Procedure, where applicable
- An employee representative or Employee Forum route, where appropriate

Concerns will be taken seriously and handled as promptly, fairly and confidentially as reasonably possible. Confidentiality cannot be guaranteed absolutely because information may need to be shared to investigate the matter, protect individuals or comply with legal obligations. Information will be shared only where there is a legitimate need.

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No person will be disadvantaged for raising a genuine concern in good faith, supporting a complaint or participating in an investigation. Deliberately false allegations made in bad faith may be addressed under the Disciplinary Procedure.

11. Breaches Of This Policy

A breach of this policy may be addressed under the appropriate Company procedure. Employees may be subject to disciplinary action up to and including dismissal. Serious discrimination, harassment, sexual harassment, bullying, victimisation or retaliation may constitute gross misconduct. Appropriate action may also be taken in relation to agency workers, contractors, suppliers, visitors or other third parties.

12. Training, Communication and Awareness

The Company will communicate this policy and provide proportionate training and guidance to employees and managers. Additional training may be provided to those involved in recruitment, people management, investigations or decision-making. Employees are expected to apply the policy in day-to-day conduct and decision-making.

13. Monitoring, Data Protection and Positive Action

The Company may monitor appropriate equality, inclusion and diversity information to assess the effect of its practices and identify potential barriers or areas for improvement. Monitoring may include recruitment outcomes, workforce representation, pay, promotion, training, turnover and employee relations trends, where lawful and proportionate.

Equality information will be collected, stored, accessed, reported and retained in accordance with data protection law and Company privacy arrangements. Reporting will normally use aggregated or anonymised information where appropriate.

Where permitted by law, the Company may consider proportionate positive action to address disadvantage, different needs or disproportionately low participation. Positive action does not permit unlawful positive discrimination.

14. Equal Pay and Equality of Terms

The Company supports the principle of equal pay for equal work, work rated as equivalent and work of equal value, in accordance with applicable law. Pay and reward arrangements will be based on objective criteria and reviewed where appropriate to identify and address unjustified inequality.

15. Third Parties and Supply Chain

The standards in this policy apply to work-related dealings with customers, suppliers, labour providers, contractors and other third parties. Employees should report inappropriate third-party conduct. The Company will consider proportionate steps to prevent recurrence and may address serious or repeated breaches through the relevant commercial or contractual arrangements.

16. Related Policies and Procedures

- Recruitment and Selection Policy
- Dignity at Work / Anti-Harassment and Bullying provisions
- Grievance Procedure
- Disciplinary Procedure
- Flexible Working Policy
- Family Leave Policies
- Whistleblowing Policy
- Data Protection Policy and Privacy Notices

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- Human Rights Policy Statement
- Reasonable Adjustments or Disability Support guidance, where applicable

17. Status And Review

This policy does not form part of any employee's contract of employment and may be amended by the Company. It will be reviewed periodically and sooner where there is a significant legal, regulatory, operational or organisational change, or where monitoring identifies a need for revision.