

# Equity, Diversity and Inclusion Policy

## 1. Purpose

At Gleeson, we recognise that each one of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. We value our people for all their differences.

We are committed to equity, diversity, and inclusion in the workplace by creating a working environment that is free from bullying, harassment, victimisation and unlawful discrimination, whilst promoting dignity and respect for all. We believe that fostering such a culture helps us to benefit from a wide range of different perspectives, experience, and skills to enable us to perform to the very best of our ability. Our aim is for our workforce to be representative of the communities that we serve, and to enable our employees to be their authentic selves. We believe that driving an inclusive culture enables everyone to thrive and feel valued.

This policy will:

- Outline our commitments to equity, diversity and inclusion and set out how we put these into practice.
- Explain the behaviours we expect of our people in support of this commitment.
- Outline important definitions to explain important aspects of equity, diversity and inclusion.
- Explain the steps you should take to resolve concerns.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

## 2. Scope

This policy applies to anyone working for us. This includes employees, workers, contractors and volunteers.

## 3. Our Commitment to you

We believe that a culture of equity, diversity and inclusion benefits both Gleeson and our employees. We will ensure that we provide fair and equitable processes with regard to all aspects of the employee lifecycle. We will strive to provide an inclusive and engaging workplace where our employees feel respected, valued and heard. We will also take a zero-tolerance approach to discrimination, bullying and harassment in the workplace and ensure that all employees and management are appropriately trained.

It is our policy to provide equitable opportunities to all employees and job applicants in all areas of the employment relationship, from vacancy advertising, recruitment and selection, training, conditions of service, including termination of employment.

No employee or job applicant will be treated less favourably because of any of the following reasons, known as “Protected Characteristics”:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

In addition, no employee or job applicant will be treated less favourably due to membership/non-membership of a Trade Union, if they are employed on a fixed term or part-time contract, based on their gender identity, national origin, socio-economic background or caring responsibilities.

#### **4. What we expect from you**

We expect you, and every one of our workers, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is formed by our day-to-day interactions, so creating a positive working environment is a responsibility that we all share. It is our expectation that all differences are respected and valued.

We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

If any of our people are found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation or bullying, we will take appropriate action under the Company Disciplinary procedure, or in the case of contractors, we will make a formal complaint to their Management team.

We expect you to report any worker's behaviour which is in breach of this policy, whether it is directed at you or another employee, worker, contractor, volunteer, customer or other third party.

## 5. Definitions:

### Equity

Gleeson strives to achieve equity for all employees. This means that we recognise that we do not all start from the same point and must therefore acknowledge and make adjustments to address any imbalances.

**Example:** Providing someone who may be visually impaired with screen reading software, braille keyboards or voice to text tools to enable them to carry out their role effectively.

### Discrimination

The Equality Act 2010 prohibits discrimination against the “Protected Characteristics” outlined above. The different types of discrimination are explained below.

**Unlawful direct discrimination:** Treating someone less favourably because of a Protected Characteristic compared with someone who does not have that characteristic.

**Example:** refusing to recruit a woman because she is pregnant or excluding one staff member from a team training event on account of their disability or race.

**Indirect discrimination:** Where a policy, procedure, or way of working that applies to everyone puts people with a particular Protected Characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it.

**Example:** a manager continually holding team meetings on a Monday, which is a day that a part-time member of the team does not work.

**Associative discrimination:** Treating someone less favourably because they are associated with someone who has a Protected Characteristic.

**Example:** not promoting a staff member because they care for a parent who had a stroke. This is discrimination against the staff member because of their association with a disabled person.

**Perceptive discrimination:** Treating someone less favourably because you perceive them to have a Protected Characteristic even if they do not.

**Example:** If colleague A harasses colleague B because they think colleague B has AIDS, even though they do not, in fact, have the illness. Colleague A has made an assumption and discriminated against colleague B based on a perception.

**Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified.

**Example:** disciplining a member of staff for repeated spelling mistakes that are in fact caused by dyslexia which amounts to discrimination arising from disability. This type of discrimination is unlawful where Gleeson and/or the Line Manager knows or could reasonably be expected to know that the person has a disability.

**Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful.

**Examples of reasonable adjustments might include:**

- Allocating some of the disabled person's duties to a colleague.
- Changing their working hours or place of work.
- Adjusting procedures for assessing job candidates; and
- Modifying disciplinary and grievance procedures.

## Harassment and Sexual harassment

Harassment is unwanted conduct related to a Protected Characteristic that has the purpose or effect of:

- Violating someone else's dignity; or
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment for someone else.

You should refer to our anti-harassment and bullying policy for further information on our procedure for reporting harassment.

## Victimisation

Victimisation is the act of treating another person less favourably either because that person has made a complaint of discrimination or harassment, or it is believed they are going to make a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint.

**Example:** if a disabled employee raises a grievance that their Line Manager is not complying with the duty to make reasonable adjustments and is then systematically excluded from all meetings because of this grievance, such behaviour could amount to victimisation.

## Bullying

There is no legal definition of bullying, however, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work. It may include intentional bullying, but it can also be unintentional or subtle. It may involve nicknames, teasing or name-calling, detrimental texts or images of colleagues posted on external websites ("cyber bullying"). It need not be targeted at an individual but could consist of a general culture which, for instance appears to tolerate the telling of homophobic jokes. Unwanted behaviour is subjective and therefore although one individual may not be offended by certain conduct, others may view this conduct differently.

It does not matter whether the effect was intended by the person responsible for the conduct. Employees can complain of behaviour that they find offensive even if it is not directed at them and the complainant does not need to possess any of the Protected Characteristics. Further, it is not relevant whether any actions perceived as bullying, harassment, discrimination, or victimisation took place within the workplace or during working time. This also extends to out of work, including social gatherings, and online activity.

### **Third Party Harassment**

Gleeson will not tolerate third party harassment i.e., from customers or clients, towards its employees. Where an employee feels that they are subject to unwanted or unwelcome behaviour from a third party, they should raise this informally in the first instance, with their Line Manager, or formally in a grievance if you do not feel the company has addressed or actioned your concerns appropriately. Please refer to the Anti-harassment and Bullying policy on the steps to take to raise a complaint against third party discrimination or harassment.

Please also see the Fairness & Respect Policy for further information on acceptable behaviour in the workplace and expectations around appropriate behaviour.

## **6. Reasonable Adjustments**

The Equality Act makes it unlawful to fail to make reasonable adjustments, as a result of disability, to overcome barriers in employment or to using services. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features if the physical feature makes it impossible or unreasonably difficult for disabled people to make use of the services. In addition, Gleeson and our employees have an obligation to think ahead and address any barrier that may impede people from accessing a service, for example ensuring documents are available in alternative formats.

## **7. Recruitment and Selection**

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination.

In line with the policy, the following statements will be adhered to in practice:

- Adopt a consistent, non-discriminatory approach to the advertising of vacancies.
- All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to undertake the role. They will not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- Interview questions will be related to the requirements of the role and will not be of a discriminatory nature.

- Selection decisions for employment or promotion are not influenced by any perceived prejudices of other employees.
- As required by law, we will ensure that all employees are entitled to work in the UK. Assumptions about immigration should not be made based on appearance or apparent nationality.

## 8. Resolving Concerns

### Informal Action

If you believe that you or another employee, worker, contractor or volunteer is being subjected to treatment or behaviour which is in breach of this policy, or if you observe behaviour which is in breach of this policy, you should seek to address this at the earliest possible stage. Where you feel able to, you should make clear to the person causing the offence that such behaviour is unacceptable. In many instances, this can be sufficient to bring an end to that behaviour.

### Seeking Informal Assistance

If you do not feel able to resolve the matter personally at an early stage, you should seek advice and support from your line manager, HR representative or Senior Manager.

The colleagues giving advice will outline potential ways of dealing with the matter, which may include:

- Dealing with the situation through discussion or formal mediation
- Raising the matter with their People Leader, a more senior manager, or a member of the HR Team.
- Accessing employee support

Whilst any of the colleagues outlined can provide impartial advice, you will be expected to make the decision about which route to follow and take responsibility for progressing with your desired actions.

## 9. Raising a Formal Complaint

If the problem has not been resolved by informal means, or you feel it cannot be resolved through informal means, then you may submit a formal grievance in line with the [Gleeson Grievance policy](#).

If the grievance relates to the conduct of a client or contact, then this will be taken forward by Gleeson and will be overseen by a named member of the Management team to ensure that an appropriate outcome is reached.

### Malicious Complaints

Gleeson will do its utmost to ensure that any employee who brings a complaint in good faith will not suffer victimisation as a direct result of lodging the complaint. Victimisation and retaliation as a result of action being taken under this Policy is unacceptable and may lead to disciplinary action. If, however, the investigation shows that the complaint was brought maliciously, formal disciplinary action may be taken against you.



## 10. Training

Equity, diversity, and inclusion training is mandatory for all employees as part of your onboarding programme, and all employees must ensure that this is completed and refreshed on at least an annual basis. If you are involved with making decisions about another employee's employment, you must attend further appropriate equity, diversity, and inclusion training as directed.

We expect all our people to proactively support our equity, diversity, and inclusion initiatives by attending events and workshops organised by the company to educate themselves on the challenges faces by others and how to help alleviate these in the workplace.

## 11. Monitoring and review

We analyse diversity and inclusion data, in compliance with our data protection obligations, on an ongoing basis to assess the impact of this policy and our equity, diversity and inclusion strategy.

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