



Equality diversity and inclusion policy

Newell's Projects Ltd is committed to providing fair opportunities and a respectful working environment across our offices, construction sites and project activities. We will prevent unlawful discrimination, harassment and victimisation, remove avoidable barriers and support people to contribute and progress based on their skills and ability.

This policy sets the standards we will apply in employment, project delivery and dealings with clients, suppliers, subcontractors and the public. The Director approving this policy is responsible for ensuring that these requirements are put into practice and that managers have the support to apply them.

Our commitment

- Treat people with dignity and respect and make decisions using fair, relevant and consistently applied criteria.
- Provide reasonable adjustments for disabled applicants and workers and accessible services where required.
- Take all reasonable steps to prevent sexual harassment and address discriminatory behaviour promptly, including behaviour by third parties.
- Make reporting routes accessible, protect people who raise concerns and provide a fair investigation and appeal.
- Provide training, monitor implementation and retain evidence of the actions taken.

Scope and legal framework

This policy applies to directors, employees, apprentices, agency workers and others working on our behalf. We require subcontractors and suppliers to meet equivalent standards. It covers recruitment, working conditions, pay, training, promotion, discipline, redundancy and dismissal, as well as work travel, events, email, messaging and online conduct connected with work.

It supports our duties under the Equality Act 2010 in Great Britain. The precise legal protections vary by circumstance and employment status. Work in Northern Ireland requires a separate review of the applicable equality legislation. We will also meet relevant contractual equality requirements.



Protection and standards of conduct

Protected characteristics

The nine protected characteristics are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Race includes colour, nationality and ethnic or national origins. Religion or belief includes a lack of religion or belief.

We respect each person's dignity and privacy. Managers must apply current law and obtain competent advice where an exception or competing rights may arise. No manager may invent a blanket exclusion or rely on stereotypes about a group.

Behaviour that is prohibited

- Direct discrimination: less favourable treatment because of a protected characteristic, including association or perceived characteristics where the law protects these.
- Indirect discrimination: a rule or practice that disadvantages a protected group and an individual, unless legally justified as a proportionate means of achieving a legitimate aim.
- Disability discrimination: unlawful unfavourable treatment arising from disability and failure to make reasonable adjustments.
- Harassment: unwanted conduct related to a relevant protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. The statutory harassment provisions do not apply identically to all nine characteristics; our conduct standards protect everyone.
- Sexual harassment: unwanted conduct of a sexual nature with that purpose or effect, and unlawful less favourable treatment because someone rejects or submits to sexual harassment or harassment related to sex or gender reassignment.
- Victimisation: subjecting a person to detriment because they have made or supported an equality complaint or carried out another protected act or are believed likely to do so.

Bullying, intimidation, offensive jokes, slurs, unwanted touching, sexual images, exclusion and abusive messages are unacceptable. Calling conduct "banter" does not excuse it. A person does not have to object at the time for conduct to be unacceptable. This standard applies to colleagues, clients, visitors, delivery drivers and other third parties.

Fair opportunities

We will not allow unlawful discrimination in pay, benefits, working arrangements or access to opportunities. We will apply equal pay requirements, including equal work between women and men. We will consider flexible working and caring needs fairly and meet the applicable statutory procedures.



Fair employment and reasonable adjustments

Recruitment and progression

- Define the competence, qualifications and experience genuinely needed for each role. Avoid unnecessary requirements that could exclude suitable candidates.
- Use accessible adverts and application arrangements. Tell applicants how to request adjustments. Assess candidates against the same documented job criteria and retain a clear selection record.
- Do not ask prohibited pre-employment health or disability questions. Limit any permitted questions to lawful purposes, such as arranging selection adjustments or establishing ability to perform an intrinsic job function with adjustments.
- Keep voluntary equality monitoring separate from selection decisions. Apply right to work checks consistently without assumptions based on name, accent or appearance.
- Allocate training, apprenticeships, promotion, overtime and project opportunities fairly. Review appraisal, disciplinary and redundancy criteria for discriminatory impact.

Requesting and providing adjustments

An applicant or worker can request an adjustment verbally or in writing through their manager or a Director. We will also act when we know, or could reasonably be expected to know, that a disabled person faces a substantial disadvantage. A formal diagnosis or use of the phrase “reasonable adjustment” is not a prerequisite for discussing support.

The responsible manager will discuss the barrier confidentially, consider the person’s suggestions, obtain relevant advice where appropriate and record the agreed action, owner and review date. Examples include accessible recruitment, adapted equipment, different communication formats, adjusted hours, changes to duties or work location, and appropriate support for mental health or neurodivergence.

Pregnancy and maternity

We will prevent pregnancy and maternity discrimination and protect relevant leave and return to work rights. Managers will review individual health and safety needs, including site hazards, working hours, suitable welfare and necessary changes to work. Decisions about redundancy or restructuring will take account of applicable maternity and family leave protections.

Review and privacy

Adjustments will be reviewed with the person after implementation and when duties, site conditions or needs change. Health and other sensitive information will be shared only with those who need it for a lawful purpose; colleagues normally need to understand the working arrangement, not the person’s diagnosis.



Inclusive construction and project delivery

Putting the policy into daily practice

Project and Site Managers will include equality and respectful conduct in mobilisation, induction and supervision. When acting as Principal Contractor, we will coordinate these expectations with subcontractors and site teams. When acting as Principal Designer, we will raise relevant inclusive access and user needs with clients and design teams within our appointment and competence.

- At mobilisation, check access routes, welfare, suitable PPE sizes and fit, communication needs and the practical arrangements for adjustments. Provide lawful, safe and dignified toilet and changing arrangements and obtain advice where needed.
- Explain conduct standards and reporting routes at induction, in a format people understand. Provide translations or interpretation where necessary for effective communication, without weakening required safety standards.
- Challenge discriminatory language, exclusion and inappropriate images or messages promptly. Remove offensive material and address concerns in site meetings and toolbox talks.
- Consult on access and usability in design and project delivery, including the needs of disabled users. Building Regulations compliance does not by itself discharge Equality Act duties.
- Provide accessible ways for clients, visitors and members of the public to communicate with us and raise concerns. Consider service accessibility in advance and make reasonable adjustments where required.

Preventing sexual harassment

A Director will oversee a documented assessment of harassment risks and the measures needed to prevent them. It will consider isolated work, power imbalances, apprentices and new starters, subcontractor interfaces, public or client contact, work travel, accommodation, social events and digital channels.

Measures will include clear conduct requirements, accessible alternative reporting routes, relevant training for workers and managers, supervision and prompt action on concerns. We will record actions, check whether they work and review the assessment after an incident or a change in work. We will take all reasonable steps as company policy from adoption, including to prevent harassment by third parties.

Supply chain expectations

Orders and subcontract arrangements will communicate our equality and conduct standards. We will ask relevant suppliers how they train personnel and handle concerns and require cooperation with investigations. Breaches may lead to corrective action, removal of an individual from site where appropriate, or contractual action, subject to a fair process and contract terms.



Reporting concerns and resolving complaints

How to report

Anyone may report a concern verbally or in writing to their line manager, Project Manager, Site Manager or a Director. If the concern involves that person, or the individual is uncomfortable using that route, they may go directly to an uninvolved Director. The company will appoint an independent external contact where internal independence is not possible. Named contacts and their contact details must be issued before this policy takes effect.

A report can describe what happened, when and where, who was involved, any witnesses and available evidence. A lack of witnesses or documents does not prevent reporting. Anonymous concerns will be considered, although anonymity may limit investigation. Nobody is required to confront the person concerned or try informal resolution first.

Our response

- Protect safety and wellbeing immediately, consider appropriate interim measures and preserve relevant evidence. Avoid automatically moving or disadvantaging the person who raised the concern.
- Acknowledge the report promptly, normally within five working days, explain the process and agree appropriate support and communication. These timescales do not restrict when a concern can be raised.
- Appoint an impartial investigator. Hear the complainant, the person complained about and relevant witnesses; review evidence fairly and give those involved an opportunity to respond. Use an external investigator if required for independence.
- Keep information confidential as far as possible and share it only where necessary for investigation, fairness or legal duties. Do not promise absolute confidentiality.
- Provide a reasoned written outcome as soon as reasonably practicable, normally aiming for 20 working days. Explain delays and provide updates. Disclose only appropriate information about another person's disciplinary outcome.
- Offer an appeal to an uninvolved Director or independent reviewer, normally requested within ten working days of the outcome. Consider reasonable extensions and adjustments. Communicate the appeal decision in writing.

At formal grievance and disciplinary hearings, we will allow statutory accompaniment by a trade union representative or fellow worker where the right applies and consider additional support as a reasonable adjustment. Confirmed misconduct will be addressed through a fair disciplinary process and may amount to gross misconduct. A complaint that is not upheld is not, by itself, evidence of bad faith.



Protection and external rights

Retaliation against a complainant, witness or person supporting a concern is prohibited. Managers will check for adverse treatment after a complaint and act if it occurs. This procedure does not prevent a report to the police, a regulator, Acas or a qualifying protected disclosure. Internal procedures do not extend statutory claim time limits; individuals may seek independent advice promptly.

Responsibilities implementation and approval

Accountability

The Director responsible for this policy will provide resources, appoint reporting contacts, oversee impartial complaint handling and review effectiveness. Managers will apply fair criteria, arrange adjustments, deliver inductions and challenge unacceptable conduct. Everyone working for us must comply, cooperate with fair investigations and report concerns or barriers. Procurement leads will communicate requirements to the supply chain.

Implementation and evidence

We will retain proportionate evidence such as induction and training records, recruitment criteria, adjustment decisions, risk assessments and anonymised management reviews. Any equality monitoring will be voluntary where appropriate, explain its purpose and use a lawful basis and applicable special category condition. Records will have restricted access and defined retention periods. Small groups will not be reported in ways that identify individuals.

Reference framework: Equality Act 2010; GOV.UK guidance on discrimination and reasonable adjustments; Acas guidance on sexual harassment and the Employment Rights Act 2025.

This policy will be reviewed and published annually.

Signed on behalf of Newell's Projects Limited:

D. M. Newell
Managing Director

Last Reviewed: Sept 2026