

## POLICY STATEMENT ON EQUALITY AND DIVERSITY

### INTRODUCTION

At Willmott Dixon we believe in equality, diversity and respect for all. We recognise the value of an inclusive environment in which people from differing backgrounds and experiences are encouraged to offer fresh ideas and perspectives.

This has a bearing on all aspects of our business and the environment in which we operate. As a Company which greatly values its reputation for acting ethically, we are committed to pro-actively enhancing diversity and appreciating the differences that diversity provides, in order to create complementary teams.

This policy should be read in conjunction with the Dignity at Work policy and our Fairness, Inclusion and Respect Charter.

For Willmott Dixon, equality and diversity encompasses the following:

**Equality** - ensuring individuals or groups of individuals are not treated less favourably, on the basis of their specific protected characteristic(s) (see 'Scope' below).

**Diversity** - diversity is about more than equality; it's about embracing and valuing all individual differences and strengths.

**Fairness** - impartial and just treatment or behaviour without favouritism or discrimination.

**Respect** - includes consideration for other people's privacy, their physical space and belongings; and respect for different viewpoints, philosophies, physical abilities, beliefs and personalities.

**Inclusion** - a culture in which everyone is treated fairly and respectfully, has equal access to opportunities and resources and where everyone can achieve their full potential.

**Intersectionality** - how individual characteristics - including race, gender, age, and more - "intersect" with one another and overlap.

### SCOPE

We are committed to ensuring that all our people, customers, and supply chain partners are treated fairly and with dignity and respect. This policy statement encompasses the nine Protected Characteristics identified in the Equality Act 2010:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;

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- religion or belief;
- sex (gender);
- sexual orientation.

We recognise that diversity goes beyond visible differences and extends to the intersection of various identities, such as race, gender, ethnicity, sexual orientation, disability, age and religion. Our commitment to intersectionality acknowledges the unique experiences and challenges faced by individuals with multiple identities. For example, while a white woman may face gender-based discrimination, a black woman may face discrimination due to her race, as well as gender-based discrimination.

## **PRINCIPLES AND INTENTIONS**

Willmott Dixon is actively working to eliminate discrimination and to promote equality, diversity, fairness, inclusion and respect. The aim of this policy is to:

- Eliminate unfair discrimination, prejudice, harassment, bullying and victimisation from within our own workplace;
- Value people and their differences and enable all of our people to achieve their full potential in an inclusive environment;
- Treat people with dignity and respect, recognising the value of each individual;
- Promote equality of opportunity and diversity awareness within the construction industry;
- Promote equality, diversity, fairness, inclusion, and respect within our supply chain partners;
- Contribute to the diversity work of our customers;
- Tailor our service delivery to meet the diverse needs of the communities in which we operate.

### **For our people:**

We aspire to increase motivation and productivity for all our people by providing career opportunities based on merit and potential. We will provide a safe, secure and accessible working environment that values the diversity of our people and future employees. We recognise the value of a workforce in which people from differing backgrounds are encouraged to offer fresh ideas, experiences and perceptions. We will ensure that our people understand diversity issues through our awareness raising programmes.

### **For our customers and the end users of our services:**

We are committed to delivering our services to our customers and to the public in a fair, equal, inclusive and non-discriminatory way and aim to contribute to the communities in which we work. We will work in partnership with our customers and communities to identify appropriate ways in which we can contribute.

### **For our industry:**

We are committed to working proactively with other construction organisations to eliminate unfair discrimination, raise awareness and understanding and enhance diversity within our industry. Where appropriate, we will work with our supply chain partners to achieve this through, for example, relevant training. Those who have Preferred Supplier status with us are required to demonstrate their commitment to equality and diversity through policy, procedure and practice.

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## **PUTTING POLICY INTO PRACTICE**

Through our 'Dignity at Work' policy Willmott Dixon complies with all statutory employment obligations by:

- Ensuring that all policies and procedures are in line with relevant employment and health and safety legislation and good practice guides, and do not restrict equality of opportunity or fair practice;
- Ensuring that anyone in contact with the Company is treated fairly, and with respect, making provisions where possible and appropriate for those groups whose needs and expectations are less well met;
- Targeting activities to include, where appropriate, particular groups or communities who may otherwise be excluded;
- Providing training to our people to facilitate a full understanding of this approach to equality and diversity;
- Providing an opportunity for feedback;
- Responding promptly and taking action where unfair or disrespectful treatment, discrimination, bullying or harassment are shown to have occurred;
- Exploring particular needs arising from diversity with individuals, e.g. neurodiversity, and, where possible and practicable, accommodating these needs;
- Ensuring that our people receive fair and equal treatment in relation to their employment, regardless of whether they are full time, part-time or temporary;
- Eliminating unfair treatment and discrimination;
- Recruiting and valuing people based on relevant and applicable skills and ability;
- Protecting our people from discrimination or harassment by others.

### **Discrimination**

Discrimination can be described as:

- Direct Discrimination is where a person is treated less favourably than others on the grounds of a protected characteristic.
- Indirect Discrimination occurs where a provision, standard or practice puts a person at a disadvantage when compared with others.
- Associative Discrimination is where a person is treated less favourably, intimidated or suffers harassment because of their association with another person.
- Perceived Discrimination occurs where someone is treated less favourably because they are perceived to have a particular Protected Characteristic. It applies even if that person does not actually possess that characteristic.

The Company does not tolerate discrimination of any kind. In deciding whether or not discrimination has taken place the Company recognises that discrimination affects people in different and complex ways and will primarily look at all of the allegations and the effect they have had on the recipient.

## **PROMOTION OF EQUALITY, DIVERSITY, FAIRNESS, INCLUSION AND RESPECT**

Willmott Dixon works towards equality, diversity, fairness, inclusion and respect in the workplace in the following ways:

- Continually reviewing working practices to ensure they do not restrict equality of opportunity or fair practice;

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- Raising awareness of equality, diversity, fairness, inclusion and respect and ensuring this is firmly established within the Company culture;
- Regular monitoring and reporting on the workforce profile to ensure a fully inclusive and diverse workforce;
- Recruiting a diverse workforce and ensuring effective integration of all our people upon joining us, whether through a TUPE transfer or an external recruitment process;
- Ensuring that our managers are effectively trained to deliver equality in recruitment, the working environment and all aspects of fair practice in management;
- Eliminating deliberate direct or indirect discrimination of any form and working to comply fully with relevant legislation;
- Working with our supply chain partners to promote equality, diversity, fairness, inclusion and respect;
- Working within our industry to identify and disseminate best practice.

**Standards for our people:**

All our people are expected to accept personal responsibility for implementing and adhering to the principles of this policy and the Dignity at Work policy. Our people have a responsibility to behave in a way that is not offensive to others and to encourage others to do the same. They are also expected to take part in regular training in support of this policy and the Dignity at Work policy.

Should an individual believe they are a victim of discrimination, harassment or unfair treatment they should raise their concerns through the Company’s grievance procedure. In the first instance, this will require the individual to notify their line manager of the issue or a more senior manager if appropriate.

Should an individual witness unfair or discriminatory treatment to a fellow colleague it is essential that they make their own line manager, local Head of People or the People Support Centre, aware.

Any individual who fails to adhere to this policy may be subject to disciplinary action. In particular, should it be found that an individual has either discriminated against or harassed another individual or group of individuals, this may be deemed as gross misconduct and the potential outcome of a disciplinary hearing may be dismissal.

**Standards for managers:**

It is the manager’s responsibility to ensure this policy becomes a reality in the workplace, taking preventative measures to stop any form of inequality or harassment. This can be achieved through regular communication of this policy to our people and new starters, leading by example and taking a zero tolerance stand point should any form of discrimination or harassment actually occur.

Specifically, a manager must:

- Undertake training so that they understand their responsibilities in relation to this policy and the Dignity at Work policy;
- Ensure that all individuals are recruited, remunerated, promoted and trained on objective criteria, having regard for their relevant skills and abilities;
- Ensure that no individual applying for a role in the Company is placed at a disadvantage by conditions or requirements which are not necessary to the performance of the job, or which constitute indirect unfair discrimination;

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- Look to identify opportunities to introduce diversity, inclusion, and flexibility. This may include a review of working practices and patterns, practical changes to the working environment or additional training;
- Ensure that all new starters are made aware of the Company approach to equality and diversity when they join the company and carry out all mandatory online training;
- Ensure that all individuals are clear on the procedure for raising a complaint should they feel they have been treated unfairly or without dignity, whether internally or through an external party;
- Promote a tolerant, fair, respectful and inclusive working environment.

## **RECRUITMENT AND SELECTION**

Recruitment and selection are key activities where equality of opportunity is important and where discrimination must be avoided. Therefore, Willmott Dixon will ensure the following:

- All job performance criteria (JPCs) shall include those requirements which are necessary and justifiable for the effective performance of the job.
- All those involved in the recruitment and selection of new people shall be trained on equality and diversity.
- Jobs are advertised on the Company’s website and in a range of appropriate media to widen the group of suitably qualified and experienced people, and to enhance diversity as appropriate.
- All selection decisions will be based on merit and suitability.
- The recruitment and selection process will be recorded through notes and decisions will be justifiable in terms of business need and candidate suitability.

## **TRAINING AND ORGANISATIONAL DEVELOPMENT**

All our people are encouraged to take advantage of training and development opportunities offered. Willmott Dixon will not discriminate in the provision of training and development opportunities and will:

- Seek to ensure that our people are developed by the provision of appropriate and accessible learning opportunities in line with organisational needs.
- Ensure that promotion is based on job performance, potential and other objective criteria including the individual’s merits, abilities, experience and possession of appropriate and required qualifications.
- Provide for all individuals involved in management, performance review, selection procedures and training, the appropriate training and guidance in the law relating to equality and diversity; and awareness of their own personal responsibility under the law.
- Ensure that all our people are actively encouraged to understand this policy and related practices and to appreciate its underlying objectives.

## **HARASSMENT AND BULLYING**

The Company is dedicated to providing a harmonious working environment where everyone is treated with respect and dignity and in which no form of intimidation or harassment will be accepted. The following are types of behaviour that are considered

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unacceptable, whether or not associated with a protected characteristic. This is a collection of examples rather than an exhaustive list:

### **Bullying and victimisation**

- Persistent criticism and personal abuse, either in public or private, which humiliates or demeans another individual.
- Direct or indirect exclusion of an individual causing them to feel alienated.
- Malicious or spiteful behaviour towards an individual or assassination of their character to others.
- Behaviour found to cause intimidation or degradation.

### **Unwanted physical conduct**

- Unnecessary touching, patting or brushing against another's body.
- Physical threats, assaults, bodily harm to another or coerced sexual behaviour.

### **Unwanted verbal conduct**

- Unwelcome advances, derogatory or patronising titles or nicknames, lewd or suggestive comments, innuendos, offensive jokes or banter that refer to a person or group's gender, race, religion, nationality, ethnic origin, political beliefs, sexual orientation, age or disability.
- Offensive, unprofessional and inappropriate language.

### **Unwanted non verbal conduct**

- Inappropriate, offensive or discriminatory emails, messages (including texts or other e-messaging), graffiti or visual displays, including the display of pornographic material.

## **COMPANY RESPONSE TO CONTRAVENTION**

The Company is committed to providing all of our people with equality of opportunity, where career progression is based on merit and potential. We will provide a working environment that values and respects the diversity of our current and future employees. In light of the above, the Company does not tolerate discrimination of any kind.

Where contravention of the Dignity at Work Policy is established the Company will not hesitate to take appropriate action, which may include dismissal. Discrimination, harassment and victimisation are examples of gross misconduct within employee terms and conditions of employment. In deciding whether or not discrimination has taken place the Company will look at the allegations and the effect they have had on the recipient.

## **MONITORING**

In order to provide ongoing information about the effectiveness of this policy and the development of a diverse workforce, Willmott Dixon will gather and monitor equality and diversity data and information across the Group. Individuals are not obliged to provide diversity data.

However, if individuals choose to do so, we are entitled to process this information because equality and diversity monitoring is in the public interest (Article 6 (1) (e) GDPR). Processing and monitoring will include:

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- Workforce and recruitment statistics analysed by equality strands;
- Results of action plans;
- Annual people satisfaction survey;
- Customer satisfaction responses;
- Supply Chain Partner responses and feedback where applicable.

Processing and monitoring of data will be carried out in strictest confidence and in accordance with our Employee Privacy notice, which can be viewed [here](#).

## **RESPONSIBILITIES**

The responsibility for equality and diversity lies with everyone. Specific responsibilities for ensuring that this approach is implemented throughout the Company are:

- The Group Chief Executive is responsible for establishing this policy across the Company.
- The COOs, MDs and Functional Heads are responsible for implementing this policy within their businesses and/or functions. They are required to promote the Company policy and to ensure that all our people are fully aware of diversity and inclusion.
- Managers must ensure that all their people are aware of their responsibilities in relation to it and respond to any allegations of a breach of this policy.
- Everyone is integral to the effectiveness of this policy and should seek to practice it in all aspects of their work. Everyone should take personal responsibility for their behaviours and actions which should always be in support of the spirit and substance of this policy. If any unfair, discriminatory or disrespectful treatment is witnessed, it should be reported to line management. If an individual feels that they have been the victim of such treatment within the work context they should contact an appropriate line manager, the local Head of People or People Support Centre.



**RICHARD LEE**  
Chief People Officer  
**WILLMOTT DIXON HOLDINGS LIMITED**

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## **APPENDICES**

### **STATUTORY FRAMEWORK**

The legal framework which underpins the Willmott Dixon equality and diversity policy approach includes the following legislation and regulations (each of which may be subject to amendment):

- Rehabilitation of Offenders Act 1974
- Trade Union and Labour Relations Act 1992
- Immigration, Asylum and Nationality Act 2006
- Employment Rights Act 1996
- Maternity and Parental Leave Regulations 1999
- Part Time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- Paternity and Adoption Leave Regulations 2002
- Employment Relations Act 1999
- Employment Relations Act 1999 (Blacklists) Regulations 2010
- Equality Act 2010
- Modern Slavery Act 2015
- The Protection from Redundancy (Pregnancy and Family Leave) Act 2023
- The Neonatal Care (Leave and Pay) Act 2023
- The Carer's Leave Act 2023

The Company also undertakes to comply with any relevant new or updated legislation that may be introduced from time-to-time.

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