

Fairness, Inclusion and Respect Policy

Willmatt Lifting Ltd

- **Policy owner:** Anthony McColl, Company Director
- **Approved by:** Anthony McColl, Company Director
- **Effective date:** 18 September 2026
- **Next review due:** 18 September 2027
- **Applies to:** Employees, workers, applicants, agency workers, subcontractors and persons working with the Company

Willmatt Lifting Ltd is committed to a workplace where people are treated fairly, included, respected and able to work without discrimination, bullying, harassment, sexual harassment or victimisation. Everyone is expected to support this commitment in conduct, decisions and working relationships.

1 Purpose and scope

This policy sets the Company's standards for fairness, inclusion and respect. It applies during recruitment and employment, on Company and client sites, while travelling or attending work events, and in work-related calls, messages, email and social media. It also applies to interactions with clients, visitors, suppliers and other third parties.

2 Legal and Company commitment

- The Company will comply with the Equality Act 2010 and other applicable employment, health and safety and data protection requirements.
- No person will be treated less favourably because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
- Direct discrimination, indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment, sexual harassment and victimisation are prohibited.
- Employment and commercial decisions will be based on objective, relevant and proportionate criteria. Retaliation against anyone who raises or supports a genuine concern is prohibited.

3 Responsibilities

- The Company Director has overall responsibility for this policy, sufficient resources, effective reporting arrangements and review of serious concerns and trends.
- Managers and supervisors must lead by example, make fair decisions, challenge inappropriate conduct, consider adjustments, respond promptly to concerns and protect confidentiality.
- All workers must treat others with dignity, follow this policy, avoid conduct that could cause offence or exclusion, cooperate with investigations and report serious concerns.
- Subcontractors, suppliers and visitors must meet equivalent standards while working for or with the Company. Material breaches may result in removal from site or termination of the engagement.

4 Fair recruitment and employment

- Job requirements, selection, allocation of work, pay, training, promotion, performance management, discipline and termination will use relevant and consistently applied criteria.
- Recruitment information will be clear and accessible. Applicants will be asked only for information relevant to the role, legal eligibility, competence and any adjustments needed for the selection process.
- Decisions and supporting evidence will be recorded where appropriate so the Company can demonstrate that criteria were applied fairly.
- Everyone will have fair access to information, development and opportunities appropriate to their role, competence and business need.

5 Disability and reasonable adjustments

- The Company will consider reasonable adjustments for disabled applicants and workers and for those who develop a health condition during employment.
- Adjustments may include changes to recruitment arrangements, duties, work patterns, equipment, access, communication, supervision, training or the working environment.
- Requests will be discussed sensitively with the individual. Occupational health or other competent advice may be obtained where appropriate and relevant information will be kept confidential.
- Safety-critical competence and legal requirements must still be satisfied, but adjustments will be considered before deciding that a person cannot perform a role.

6 Bullying, harassment and sexual harassment

Unacceptable conduct may be a single incident or repeated behaviour and may be verbal, physical, written, visual or online. It includes:

- Threats, intimidation, humiliation, shouting, deliberate exclusion, abuse of authority, unwanted nicknames or persistent unreasonable criticism.
- Offensive jokes, 'banter', slurs, comments, images, gestures or messages linked to a protected characteristic.
- Unwanted sexual comments, questions, contact, invitations, advances, displaying sexual material or conduct that creates an intimidating, hostile, degrading, humiliating or offensive environment.
- Harassment by clients, suppliers, subcontractors, visitors or members of the public. Workers should report this promptly so protective and contractual action can be taken.

The Company will take reasonable steps to prevent sexual harassment, including assessing workplace and third-party risks, setting clear standards, providing information and training, maintaining reporting routes and acting on warning signs. Legal developments will be monitored and controls strengthened where required.

7 Respect and inclusion on site

- Respectful language and professional conduct are required in welfare facilities, vehicles, offices, workshops and on client sites. Initiation practices, hazing and degrading behaviour are forbidden.
- PPE, welfare and task arrangements will be reviewed so they are suitable and inclusive so far as reasonably practicable, while maintaining safety and legal compliance.
- Workers may raise concerns about conduct by another contractor or client representative. The Company will not require a person to tolerate abuse as a condition of work.

8 Raising a concern

- A concern may be raised with the person's line manager, the Company Director, or another appropriate senior contact where the normal route is involved or unsuitable.
- Concerns may be raised verbally or in writing and will be handled confidentially as far as reasonably possible. Anonymous information will be considered where sufficient detail is available.
- Immediate threats, violence or serious safety risks must be reported at once and emergency or site procedures followed.
- A worker may also use the Company's grievance or whistleblowing arrangements where applicable. Raising a genuine concern in good faith will not result in retaliation or victimisation.

9 Response, investigation and action

- Concerns will be acknowledged and assessed promptly. Interim measures may be introduced to protect those involved and preserve a fair process.
- Investigations will be impartial, proportionate and conducted by a person without a conflict of interest. Relevant parties will have a fair opportunity to provide information.
- Information will be shared only where necessary. The person raising the concern will be informed of progress and outcome as far as confidentiality permits.
- Substantiated breaches may result in training, mediation where appropriate, corrective action, disciplinary action, removal from site or ending a supplier or subcontractor engagement.
- A concern that is not upheld will not itself be treated as misconduct. Deliberately malicious or knowingly false allegations may be addressed under the disciplinary procedure.

10 Communication, training and records

- This policy is issued during induction, made available with Company policies and reinforced through briefings, toolbox talks and relevant training.
- Managers and supervisors receive information on fair decision-making, reasonable adjustments, recognising and preventing harassment, receiving concerns and avoiding retaliation.
- Policy issue, acknowledgements, briefings and training attendance are recorded. Investigation and equality-related records are stored securely with access limited to authorised persons.

11 Monitoring and review

- The Company reviews complaints, workforce feedback, recruitment and employment decisions, training completion and relevant subcontractor or client issues for patterns requiring action.
- Corrective actions are assigned, tracked and checked for effectiveness. Lessons learned are communicated without identifying individuals unnecessarily.
- This policy is reviewed at least annually and sooner following a serious concern or a significant legal, organisational or operational change.

12 Approval

I approve this Fairness, Inclusion and Respect Policy on behalf of Willmatt Lifting Ltd and require it to be communicated and applied throughout work under the Company's control.

Signed by: Anthony McColl, Company Director



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