Equality and Diversity Policy

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1. Policy Statement

Pave Aways Limited is committed to providing a working environment in which everyone is treated fairly, with dignity and respect, and where equality, diversity and inclusion are actively promoted.

As a construction company operating throughout England and, where required, Wales, the Company recognises that individuals bring different skills, experiences, backgrounds and perspectives that contribute to the success of our business. We are committed to ensuring that employment decisions, site operations, project delivery, procurement and business relationships are conducted fairly, consistently and without unlawful discrimination.

The Company will comply with applicable equality and employment legislation, including the Equality Act 2010, and will take appropriate and proportionate steps to prevent discrimination, harassment, sexual harassment and victimisation.

Pave Aways Limited will not tolerate bullying, discriminatory conduct, harassment, victimisation or any other inappropriate behaviour that undermines an individual's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

This commitment applies to all aspects of our business, including our offices, construction sites, temporary workplaces, work-related travel, training, meetings, Company events and work-related communications.

The Company expects everyone working for or representing Pave Aways Limited to contribute to a culture of fairness, respect and inclusion.

2. Purpose

The purpose of this policy is to:

- Establish clear standards for equality, diversity, inclusion and respectful behaviour.
- Prevent unlawful discrimination, harassment, sexual harassment and victimisation.
- Promote equality of opportunity throughout employment and business activities.
- Ensure recruitment, training, promotion, work allocation and other employment decisions are based on objective and relevant criteria.
- Identify and remove unnecessary barriers to employment, participation and progression.
- Provide reasonable adjustments where required by law.
- Promote appropriate standards of behaviour across construction sites and project teams.
- Set out the responsibilities of directors, managers, employees and relevant third parties.

- Provide clear routes for raising concerns and ensure complaints are addressed appropriately.
- Monitor the effectiveness of the Company's arrangements and implement improvements where necessary.

3. Scope

This policy applies to:

- Directors and senior management.
- Permanent, fixed-term and part-time employees.
- Apprentices, trainees and work experience personnel.
- Temporary and agency workers.
- Job applicants.
- Consultants and self-employed individuals working for or on behalf of the Company.
- Subcontractors and their workforce while undertaking work on Company projects.
- Suppliers, clients, visitors and other individuals interacting with the Company, where relevant to our activities.

The policy covers all stages of employment and relevant business activities, including recruitment, induction, work allocation, pay, training, development, promotion, performance management, disciplinary and grievance matters, redundancy, termination, procurement and project delivery.

Where third parties are involved, the Company will apply appropriate contractual, management and site-control arrangements to promote compliance with this policy.

4. Legal and Other Requirements

Pave Aways Limited will comply with applicable equality and employment legislation and relevant legal duties, including, where applicable:

- Equality Act 2010.
- Employment Rights Act 1996.
- Protection from Harassment Act 1997.
- Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Applicable employment regulations and associated legal requirements.

The Company will keep relevant legal requirements under review and update its arrangements where necessary.

This policy does not replace individual statutory rights or the Company's other legal responsibilities.

5. Equality, Diversity and Inclusion Principles

The Company will apply the following principles throughout its operations.

5.1 Equality of opportunity

Individuals will be given fair access to employment, training, development and progression opportunities, subject to legitimate role requirements and applicable law.

5.2 Fair and objective decisions

Decisions will be based on relevant factors such as competence, qualifications, experience, performance, suitability and genuine business requirements. Unlawful discriminatory assumptions will not influence decisions.

5.3 Dignity and respect

Everyone is expected to treat colleagues, subcontractors, clients, visitors and members of the public with courtesy, professionalism and respect.

5.4 Inclusion

The Company will seek to create an environment in which individuals can contribute effectively without unnecessary barriers, exclusion or prejudice.

5.5 Prevention of discrimination and harassment

The Company will not tolerate unlawful discrimination, harassment, sexual harassment or victimisation. Bullying and other inappropriate behaviour will also be addressed, whether or not it meets a specific legal definition.

5.6 Reasonable adjustments

Where required by law, the Company will consider and implement reasonable adjustments to reduce or remove substantial disadvantages experienced by disabled applicants, employees and workers.

5.7 Proportionate implementation

The Company's arrangements will reflect the size, nature and risks of its operations, while meeting applicable legal requirements and maintaining appropriate standards of behaviour.

6. Protected Characteristics and Discrimination

The Equality Act 2010 identifies nine protected characteristics:

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

- Religion or belief.
- Sex.
- Sexual orientation.

Pave Aways Limited will not unlawfully discriminate against individuals because of a protected characteristic.

The Company recognises that discrimination may occur in different ways, including:

- **Direct discrimination:** treating someone less favourably because of a protected characteristic.
- **Indirect discrimination:** applying a provision, criterion or practice that puts people sharing a protected characteristic at a particular disadvantage, unless it can be objectively justified where the law permits.
- **Harassment:** unwanted conduct related to a relevant 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:** unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation:** subjecting someone to a detriment because they have carried out a protected act under equality legislation, such as raising or supporting a discrimination complaint.

The Company will also address bullying, intimidation, exclusion and other inappropriate behaviour that conflicts with its standards, even where the conduct does not constitute unlawful discrimination.

7. Recruitment and Selection

Recruitment and selection will be fair, consistent and based on the genuine requirements of the role.

The Company will:

- Use relevant and objective selection criteria wherever reasonably practicable.
- Ensure job descriptions and advertisements focus on the skills, qualifications, experience and competence required.
- Avoid discriminatory recruitment practices and unnecessary barriers to application.
- Conduct interviews and assessments fairly and consistently.
- Consider reasonable adjustments for disabled applicants.
- Avoid unlawful discrimination in decisions about appointment, terms of employment and access to opportunities.
- Apply necessary qualifications, licences, training and safety-critical competence requirements consistently.
- Retain appropriate recruitment records in accordance with Company procedures and applicable data protection requirements.

No applicant will be excluded on the basis of assumptions or stereotypes about a protected characteristic.

8. Employment, Training and Career Development

The Company will seek to provide fair access to training, competence development, promotion, additional responsibilities and career progression.

Decisions will be based on relevant factors, including role requirements, competence, performance, qualifications, experience, potential and business needs.

Managers will ensure that access to training and development is not unfairly restricted because of a protected characteristic.

Where appropriate, the Company will consider reasonable adjustments to enable individuals to participate in training, meetings, assessments and other work-related activities.

9. Disability and Reasonable Adjustments

Pave Aways Limited recognises its legal responsibilities towards disabled applicants, employees and workers.

Where applicable, the Company will:

- Consider requests for reasonable adjustments.
- Consult with the individual concerned to understand the disadvantage experienced and identify appropriate measures.
- Consider adjustments to working arrangements, equipment, workstations, communication methods, duties or working practices.
- Review adjustments where circumstances, work activities or individual needs change.
- Handle disability-related and medical information confidentially and in accordance with applicable data protection requirements.

Adjustments will be assessed on their individual circumstances, effectiveness, reasonableness and applicable legal requirements.

Health and safety requirements will continue to be met. Where a role involves safety-critical duties, the Company will assess relevant risks and competence objectively and consider reasonable adjustments before reaching decisions.

10. Pregnancy, Maternity and Other Relevant Needs

The Company will not unlawfully discriminate against individuals because of pregnancy, maternity or other protected characteristics.

Where relevant, the Company will assess workplace risks, consider applicable legal duties and implement appropriate control measures or adjustments.

Managers must refer relevant health and safety concerns through the Company's established arrangements and must not make assumptions about an individual's ability to work.

Requests relating to religious observance, disability, caring circumstances or other personal needs will be considered fairly and in accordance with applicable legal requirements and legitimate operational considerations.

11. Equality and Inclusion on Construction Sites

Pave Aways Limited recognises that construction sites involve diverse workforces, multiple employers, subcontractors, temporary facilities and changing working arrangements. Clear behavioural standards are therefore essential.

The Company will:

- Expect professional and respectful behaviour from all site personnel.
- Prohibit discriminatory, abusive or intimidating language and conduct.
- Address racist, sexist, homophobic, biphobic, transphobic and other discriminatory behaviour.
- Include relevant behavioural expectations within site inductions, briefings and workforce communications, as appropriate.
- Require site managers and supervisors to respond appropriately to reported or observed misconduct.
- Ensure concerns are escalated through the appropriate management channels.
- Take proportionate action where inappropriate conduct is identified.

These standards apply to permanent employees, agency workers, subcontractors, visitors and other persons working on or visiting Company projects.

Site managers and supervisors must not ignore inappropriate conduct on the grounds that it is customary, intended as a joke, part of site culture or outside their direct employment responsibilities.

Where an issue involves a subcontractor or other third party, the relevant manager must take appropriate steps within the Company's control, including escalation to the responsible contractor or senior management.

12. Subcontractors, Suppliers and Business Partners

Pave Aways Limited expects subcontractors, suppliers, consultants and other business partners to comply with applicable equality legislation and support the principles of this policy.

Where appropriate, the Company will consider equality, inclusion and respectful behaviour as part of procurement, subcontractor selection, site management and contract administration.

Subcontractors working on Company projects are expected to:

- Ensure their workforce behaves respectfully and complies with applicable legal requirements.
- Prevent and address discriminatory conduct, harassment and victimisation.
- Cooperate with reasonable requests to investigate relevant incidents or complaints.
- Comply with applicable site rules and instructions.
- Take appropriate corrective action where unacceptable behaviour is identified.

Where serious or repeated breaches occur, the Company may implement appropriate management measures or contractual action, subject to the relevant arrangements.

13. Equal Pay and Fair Treatment

Pave Aways Limited is committed to complying with applicable equal pay legislation.

The Company will seek to ensure that pay and contractual benefits are determined fairly and without unlawful discrimination.

Relevant factors may include the role, responsibilities, competence, qualifications, experience, performance, contractual arrangements and legitimate business requirements.

The Company will consider concerns about pay or benefits through the appropriate management or grievance process and review practices where necessary to identify and address unjustified inequalities.

14. Harassment, Sexual Harassment, Bullying and Victimisation

Pave Aways Limited will take reasonable and proportionate steps to prevent harassment and sexual harassment and will respond appropriately when concerns arise.

Examples of unacceptable behaviour may include:

- Offensive, derogatory or discriminatory comments.
- Racist, sexist, homophobic, biphobic or transphobic language.
- Unwanted jokes, gestures or comments relating to protected characteristics.
- Unwanted sexual comments, advances, messages or physical contact.
- Displaying or sharing offensive or sexually inappropriate material.
- Intimidation, threats or deliberate humiliation.
- Excluding or undermining someone because of a protected characteristic.
- Retaliating against an individual for raising or supporting a complaint.
- Encouraging, permitting or ignoring inappropriate behaviour.

This policy applies to conduct in person and through telephone calls, emails, messaging services, social media and other work-related communication channels.

The Company will take reasonable steps to prevent sexual harassment, including considering relevant workplace risks, communicating expected standards, addressing identified concerns and providing appropriate guidance or training where necessary.

Managers must act on concerns that come to their attention and must not dismiss inappropriate conduct simply because no formal complaint has been made.

15. Raising Concerns and Complaints

Any individual who experiences or witnesses discrimination, harassment, sexual harassment, bullying or victimisation is encouraged to raise the matter as soon as reasonably practicable.

Concerns may be raised with:

- Their line manager.
- The Site Manager, Project Manager or Contract Manager.
- The Health, Safety and Environmental Manager, where appropriate.
- A member of senior management.
- A Company Director.
- The appropriate contact identified in the Company's grievance or whistleblowing procedures.

Where the concern relates to the individual's manager, or they do not feel comfortable raising it through the normal reporting line, they may approach another manager or a Director.

Concerns may be raised informally or through the Company's formal grievance or other applicable procedure, depending on the circumstances.

The Company will:

- Take concerns seriously and assess them promptly.
- Investigate allegations fairly and impartially, as appropriate.
- Maintain confidentiality so far as reasonably practicable.
- Protect individuals from victimisation for making a protected complaint or participating in an investigation.
- Take appropriate corrective, management or disciplinary action where necessary.
- Keep relevant records in accordance with Company procedures and applicable data protection requirements.

Confidentiality cannot be guaranteed where disclosure is necessary to investigate a concern, protect individuals or meet legal obligations.

Nothing in this policy prevents an individual from exercising their statutory rights or seeking independent advice.

16. Responsibilities

16.1 Managing Director and Senior Management

The Managing Director and senior management are responsible for:

- Demonstrating leadership and commitment to equality, diversity and inclusion.
- Ensuring this policy is approved, communicated and reviewed.
- Providing appropriate resources and arrangements for implementation.
- Ensuring concerns are addressed appropriately and without undue delay.
- Taking appropriate action where serious or repeated breaches occur.
- Reviewing the effectiveness of the Company's approach and authorising improvements where necessary.

16.2 Managers, Project Managers and Site Managers

Managers and supervisors are responsible for:

- Implementing this policy within their areas of responsibility.
- Applying employment and work allocation decisions fairly and objectively.
- Promoting respectful behaviour and challenging inappropriate conduct.
- Communicating relevant behavioural expectations to site personnel.
- Taking concerns seriously and escalating them through the appropriate channels.
- Supporting individuals who raise concerns without prejudging the outcome.
- Cooperating with investigations and implementing corrective actions.
- Ensuring subcontractor-related concerns are addressed within the Company's contractual and management arrangements.

16.3 Employees and Workers

All employees and workers are responsible for:

- Treating others with dignity, fairness and respect.
- Complying with this policy and relevant Company procedures.
- Refraining from discriminatory, harassing, bullying or victimising behaviour.
- Raising concerns about inappropriate conduct where appropriate.
- Cooperating honestly with investigations.
- Completing relevant training or briefings where required.

16.4 Subcontractors and Other Third Parties

Subcontractors and other relevant third parties are expected to comply with applicable legal requirements, contractual obligations and relevant Company site rules.

They must cooperate with reasonable steps taken by the Company to address equality-related concerns affecting its projects or activities.

17. Training and Communication

The Company will communicate this policy through appropriate channels, which may include:

- Employee induction and onboarding.
- Site inductions.
- Toolbox talks and workforce briefings.
- Management briefings.
- Company communications and electronic systems.
- Relevant equality, diversity, inclusion and harassment awareness training.

Managers and supervisors will be made aware of their responsibilities for promoting respectful behaviour, responding to concerns and escalating potential breaches.

Additional guidance or training will be provided where a particular need, risk, incident or change in legal requirements is identified.

18. Monitoring, Corrective Action and Review

Pave Aways Limited will monitor the implementation and effectiveness of this policy through appropriate management arrangements.

Where appropriate and proportionate, the Company may review:

- Recruitment and selection practices.
- Access to training and development.
- Promotion and progression opportunities.
- Grievances and complaints.
- Reports of discrimination, harassment, sexual harassment and victimisation.
- Site behavioural issues and subcontractor-related concerns.
- Feedback from employees and workers.
- Findings from audits, inspections and management reviews.
- Changes to relevant legislation and guidance.

Personal information will be handled in accordance with applicable data protection requirements. Any monitoring will be proportionate to the Company's needs and available information.

Where shortcomings or potential inequalities are identified, the Company will consider appropriate corrective or preventative action, assign responsibility where necessary and review whether the action has been effective.

This policy will be reviewed at least annually and sooner where there are significant changes to legislation, Company operations, identified risks or lessons arising from complaints or incidents.

19. Breaches of the Policy

Failure by an employee to comply with this policy may result in management or disciplinary action in accordance with the Company's procedures.

Serious breaches, including deliberate discrimination, harassment, sexual harassment, bullying, victimisation or retaliation, may constitute gross misconduct, depending on the circumstances and applicable procedures.

Where a subcontractor, supplier or other third party breaches this policy or relevant contractual requirements, the Company may take appropriate action, including requiring corrective measures, restricting access to a site or pursuing contractual remedies where justified.

All action will be proportionate to the circumstances and consistent with applicable legal and contractual requirements.

20. Related Policies and Procedures

This policy should be read in conjunction with the relevant Pave Aways Limited policies and procedures, including:

- Recruitment and Selection Procedures.
- Grievance Procedure.
- Disciplinary Procedure.
- Whistleblowing Policy.
- Health and Safety Policy.
- Occupational Health Arrangements.
- Modern Slavery Policy.
- Training and Competence Procedures.
- Relevant site rules and subcontractor management arrangements.

Where applicable, these documents should be used together to ensure concerns are reported, investigated and addressed consistently.

21. Commitment to Continuous Improvement

Pave Aways Limited recognises that equality, diversity and inclusion require more than legal compliance. They depend on the everyday behaviour of individuals, effective management and a willingness to challenge inappropriate conduct.

The Company is committed to maintaining a workplace and business environment in which people are treated fairly, differences are respected and everyone is expected to act professionally.

We will continue to review our arrangements, learn from concerns and incidents, and take reasonable steps to remove unnecessary barriers and improve inclusion across our workforce, construction projects and business relationships.

Signed by:



Steve Owen, Managing Director

Dated: 03/09/26
Review: 03/09/27