

R&M POLICY · PEOPLE AND ETHICS

Fairness, Inclusion and Respect Policy

Equality, diversity and inclusion policy and procedure

R&M Property Group Ltd

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Approved by	Thomas McKenna, Director
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1. Purpose

This policy sets out R&M Property Group Ltd's commitment to fairness, inclusion, and respect in the workplace and across its operations. It describes the actions the company has taken and continues to take to meet the requirements of the equality duties under the Equality Act 2010, to ensure that all people are treated fairly and equally, and that no group of people is treated less favourably than others. This policy also serves as the company's Equality, Diversity and Inclusion (EDI) Policy.

2. Scope

This policy applies to all employees, workers, contractors, sub-contractors, suppliers, clients, site visitors, job applicants, and any other person who works with, works for, or interacts with R&M Property Group Ltd. It covers all aspects of employment and engagement including recruitment, selection, training, promotion, pay, benefits, working conditions, disciplinary and grievance procedures, and termination of employment. It also applies to the company's procurement and supply chain management activities.

3. Legal Framework

R&M Property Group Ltd complies with all relevant equality and anti-discrimination legislation, including:

- Equality Act 2010 - the principal legislation prohibiting discrimination, harassment, and victimisation in employment and the provision of services.
- Human Rights Act 1998 - protecting fundamental rights and freedoms.
- Employment Rights Act 1996 - protecting employees from unfair treatment.
- Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000.
- Fixed-Term Employees (Prevention of Less Favourable Treatment) Regulations 2002.
- Agency Workers Regulations 2010.

3.1 Protected Characteristics

The Equality Act 2010 identifies nine protected characteristics. R&M is committed to ensuring that no person is treated less favourably on the grounds of:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

This commitment extends beyond the minimum legal requirements. R&M values the diversity of its workforce and recognises that a culture of fairness, inclusion, and respect is essential to

attracting and retaining skilled people, delivering high-quality projects, and meeting the expectations of clients and framework operators.

3.2 Public Sector Equality Duty

Many of R&M's clients are public sector bodies subject to the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010. The PSED requires public authorities, in the exercise of their functions, to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not. As a contractor delivering services on behalf of public sector clients, R&M supports its clients in meeting their PSED obligations by maintaining robust equality practices across its operations, workforce, and supply chain, and by providing equality-related data and evidence when requested by clients and framework operators.

4. Statement of Commitment

R&M Property Group Ltd is committed to:

- Treating everyone with fairness, dignity, and respect regardless of any protected characteristic.
- Creating and maintaining an inclusive workplace free from discrimination, harassment, bullying, and victimisation.
- Promoting equality of opportunity in recruitment, training, career development, pay, and sub-contractor selection.
- Making reasonable adjustments to ensure that disabled people are not placed at a substantial disadvantage in the workplace or on site.
- Ensuring equal pay for equal work regardless of sex or any other protected characteristic.
- Embedding the Fairness, Inclusion and Respect (FIR) framework promoted by the Supply Chain Sustainability School and other industry bodies.
- Challenging discriminatory behaviour wherever it is encountered, whether from employees, sub-contractors, clients, or any other person.
- Encouraging and supporting a diverse workforce at all levels of the organisation.

5. Responsibilities

5.1 Thomas McKenna, Director

- Overall accountability for the implementation and effectiveness of this policy.
- Approves this policy and any updates following review.
- Ensures adequate resources are allocated to deliver the company's equality and inclusion commitments.
- Sets the tone from the top by modelling inclusive leadership behaviours.

5.2 Phillip Hollingworth, H&S Adviser (Spectra Safety)

- Advises the company on equality legislation, best practice, and the PSED.
- Supports managers in handling equality-related concerns, complaints, and grievance investigations.
- Monitors equality-related incidents, complaints, and trends and reports to the Director.
- Coordinates equality, diversity, and inclusion training programmes.

- Reviews the policy annually and recommends updates in response to legislative changes or industry developments.

5.3 Site Managers and Project Managers

- Ensure that FIR principles are communicated and upheld on their projects, including at induction, toolbox talks, and pre-start meetings.
- Address any discriminatory, bullying, or disrespectful behaviour promptly and in accordance with the company's procedures.
- Ensure that site facilities - welfare units, toilets, changing areas, and PPE - are inclusive and suitable for all genders, backgrounds, and physical needs.
- Ensure that sub-contractors and their workforce comply with this policy while working on R&M projects.

5.4 All Employees, Workers, and Sub-Contractors

- Treat all colleagues, sub-contractors, clients, site visitors, and members of the public with fairness, dignity, and respect.
- Report any concerns about discrimination, harassment, bullying, or victimisation through the reporting channels described in Section 10.
- Attend equality and FIR training as required.
- Understand that breaches of this policy will be treated as a disciplinary matter.

6. Actions Taken to Meet Equality Duties

R&M Property Group Ltd has taken the following actions to meet its obligations under the Equality Act 2010 and to embed fairness, inclusion, and respect across its operations:

6.1 Recruitment and Selection

- All job advertisements are worded to encourage applications from a diverse range of candidates and avoid language that could discourage any protected group.
- Selection decisions are based solely on skills, qualifications, experience, and merit. Interview panels use structured questions and scored criteria to minimise unconscious bias.
- Application forms do not request information about protected characteristics at the shortlisting stage. Equality monitoring data is collected separately and used only for monitoring purposes.
- The company actively engages with local employment programmes, colleges, and training providers to widen access to construction careers for under-represented groups.

6.2 Training and Awareness

- All new starters receive FIR awareness training as part of the company induction, covering the nine protected characteristics, expected behaviours, and reporting procedures.
- Managers and supervisors receive additional training on inclusive leadership, managing diverse teams, recognising and addressing unconscious bias, and handling equality-related grievances.
- Toolbox talks on FIR topics - including respect on site, cultural awareness, mental health awareness, and challenging inappropriate behaviour - are delivered regularly across all projects.

- R&M is registered with the Supply Chain Sustainability School and uses its FIR learning pathway to support ongoing workforce development.
- Training is delivered in accessible formats - oral, written, visual, and digital - with adaptations for operatives where English is not their first language, in line with R&M's commitment to training accessibility.

6.3 Inclusive Working Environment

- Site welfare facilities are provided to accommodate all genders, including separate or lockable toilet and changing facilities where required.
- PPE is sourced in a range of sizes and styles to accommodate different body types, and alternatives are provided where standard PPE is unsuitable for religious or cultural reasons (for example, hijab-compatible hard hats).
- Consideration for cultural and religious practices - including prayer times, dietary requirements in welfare facilities, and leave for religious observance - is incorporated into site planning.
- Site signage and safety information is provided in multiple languages where the workforce includes operatives whose first language is not English.
- FIR posters and the company's reporting contact details are displayed in welfare areas and site notice boards on every project.

6.4 Equal Pay

R&M is committed to the principle of equal pay for equal work. Pay rates are determined by the role, level of responsibility, qualifications, and experience - not by any protected characteristic. The company reviews its pay arrangements periodically to identify and address any unjustified pay gaps. Where the company grows to meet the reporting threshold (250 or more employees), it will comply with gender pay gap reporting requirements.

6.5 Reasonable Adjustments

R&M has a duty under the Equality Act 2010 to make reasonable adjustments to ensure that disabled employees, workers, and job applicants are not placed at a substantial disadvantage compared with non-disabled persons. The company takes the following approach:

- At recruitment - applicants are asked whether they require any adjustments to the interview or selection process, and these are provided.
- In employment - where an employee or worker has a disability or long-term health condition, the company discusses and agrees reasonable adjustments to their role, working arrangements, equipment, or environment. This may include modified duties, flexible working hours, adapted workstations, additional supervision, or assistive technology.
- On site - site access, welfare facilities, and working areas are reviewed to ensure they are accessible. Where adjustments are needed - for example ramps, accessible toilets, or alternative task allocation - these are implemented promptly.
- Occupational health - where appropriate, the company seeks occupational health advice to understand the adjustments that would enable an individual to work safely and effectively.
- All reasonable adjustment discussions and outcomes are recorded confidentially and reviewed periodically to ensure they remain effective.

6.6 Supply Chain

- Sub-contractors are required to demonstrate their own commitment to equality and FIR principles as part of R&M's pre-qualification process.

- Sub-contract agreements include a requirement to comply with the Equality Act 2010 and with R&M's FIR policy while working on R&M projects.
- Sub-contractor workforce behaviour is monitored on site. Discriminatory or disrespectful behaviour by a sub-contractor's employee is addressed with the sub-contractor's management and may result in removal from site.
- R&M encourages its supply chain partners to register with the Supply Chain Sustainability School and to complete the FIR learning pathway.

7. Types of Prohibited Conduct

The following types of conduct are prohibited under the Equality Act 2010 and under this policy:

- **Direct discrimination -** treating a person less favourably than others because of a protected characteristic.
- **Indirect discrimination -** applying a provision, criterion, or practice that puts people with a particular protected characteristic at a disadvantage, unless it can be objectively justified.
- **Harassment -** unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- **Victimisation -** subjecting a person to a detriment because they have made or supported a complaint of discrimination, or are believed to have done so.
- **Discrimination by association -** treating a person less favourably because of their association with another person who has a protected characteristic.
- **Discrimination by perception -** treating a person less favourably because of a perception that they have a protected characteristic, whether or not they actually do.

These definitions apply to conduct in the workplace, on construction sites, at company events, during work-related travel, and in any other situation connected with work.

8. Prevention of Harassment and Bullying

R&M operates a zero-tolerance approach to harassment and bullying. This includes harassment related to any protected characteristic, sexual harassment, and bullying that is not related to a protected characteristic but which undermines a person's dignity or creates a hostile environment. The company's Anti-Bullying and Harassment Policy and Prevention of Sexual Harassment Policy set out the detailed procedures for addressing these issues. All managers, supervisors, and site managers are trained to recognise the signs of harassment and bullying and to take immediate action.

9. Inclusive Communication

R&M is committed to communicating in ways that are inclusive and accessible to all members of its workforce and supply chain:

- Company policies, procedures, and site safety information are available in accessible formats on request, including large print, translated documents, and verbal briefings.
- Toolbox talks and team briefings are delivered using a mixture of oral, written, visual, and digital methods to accommodate different learning styles and language abilities.

- Where a significant proportion of the site workforce speaks a language other than English, key safety and welfare information is provided in the relevant languages and bilingual operatives or interpreters are used for critical briefings.
- The company avoids jargon, acronyms, and unnecessarily complex language in workforce communications.

10. Reporting and Resolving Concerns

Any employee, worker, sub-contractor, or other person who experiences or witnesses discrimination, harassment, bullying, victimisation, or any other breach of this policy is encouraged to report it. Reports can be made through the following channels:

- Directly to the individual's line manager or site manager.
- To Phillip Hollingworth, H&S Adviser (Spectra Safety), for confidential advice and support.
- To Thomas McKenna, Director, for matters of a serious nature or where the individual is not comfortable reporting to their line manager.
- Anonymously, through the company's confidential reporting arrangements where available.

All reports are taken seriously and investigated fairly, promptly, and confidentially. The investigation process follows the company's grievance procedure. No person will be penalised or victimised for making a report in good faith, even if the complaint is not ultimately upheld. Where a complaint is substantiated, appropriate action is taken, which may include disciplinary action up to and including dismissal for employees, or removal from site and termination of engagement for sub-contractors.

11. Disciplinary Action

Any employee who is found to have committed an act of discrimination, harassment, bullying, or victimisation will face disciplinary action in accordance with R&M's disciplinary procedure. Serious breaches, including acts of deliberate discrimination, harassment, or hate-related conduct, may be treated as gross misconduct and may result in summary dismissal. Sub-contractors and suppliers who breach this policy may have their engagement terminated.

12. Monitoring and Measuring Effectiveness

R&M monitors the effectiveness of this policy and its equality practices through the following mechanisms:

- Equality monitoring data - collected anonymously at recruitment to monitor the diversity of applicants and appointments. Data is reviewed annually to identify any patterns that may indicate barriers to under-represented groups.
- Workforce diversity data - reviewed periodically to understand the composition of the workforce by protected characteristic, where individuals have chosen to share this information.
- Complaints and incidents - all equality-related complaints, grievances, and incidents are recorded, monitored, and reviewed for trends by the Compliance Officer.
- Employee feedback - staff surveys and informal feedback are used to assess whether employees feel the workplace is fair, inclusive, and respectful.

- Training records - completion rates for FIR and equality training are monitored and any gaps addressed.
- Supply chain - FIR compliance is monitored through pre-qualification assessments, site audits, and feedback from site teams.
- Client and framework reporting - R&M provides equality and diversity data to clients and framework operators on request, supporting their PSED reporting obligations.

13. Policy Review

This policy is reviewed annually by the Compliance Officer and the Director, or sooner if there is a significant change in equality legislation, ICO or EHRC guidance, industry best practice, or following any significant equality-related incident. The review considers the effectiveness of the policy, any complaints or incidents since the last review, workforce diversity data, training completion rates, supply chain compliance, and feedback from employees and clients. All changes are approved by the Director.

14. Related Documents

- Anti-Bullying and Harassment Policy
- Prevention of Sexual Harassment Policy
- Mental Health and Wellbeing Policy
- Modern Slavery and Human Trafficking Policy
- Competency Management Procedure (RM-CMP-001)
- Sub-Contractor Selection and Monitoring Policy
- Behavioural Safety Programme
- Grievance Procedure
- Disciplinary Procedure

Signed and Approved:

Thomas McKenna

Director, R&M Property Group Ltd

Date: June 2026