



Equal Opportunities and Diversity Policy

Fair Treatment in Recruitment, Employment and the Workplace

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Policy Owner	Anthony Litchfield, Managing Director
Prepared / Maintained by	Adam Baxter, Head of Compliance & Project Coordination (IMS Management Representative)
Related System	Integrated Management System (SB4G-IMS-001)

1. Policy Statement

SB4 Construction Group Ltd (“SB4”, “the Company”, “we”) is committed to being an equal opportunities employer and to promoting equality, diversity and inclusion in all that we do. We believe that everyone deserves to be treated fairly, with dignity and respect, and that our business is stronger for the range of backgrounds, experiences and perspectives of the people who work with us.

We are opposed to all forms of unlawful and unfair discrimination. No job applicant, employee, worker, subcontractor, consultant or visitor will receive less favourable treatment on the grounds of a protected characteristic, and every decision about recruitment, employment, training, progression and day-to-day treatment will be made fairly and on merit.

This policy forms part of our Integrated Management System (IMS) and supports our commitments under our accreditations, including **SSIP and Constructionline Gold**. It is published on our website in the interests of openness and accountability.

2. Purpose and Scope

The purpose of this policy is to set out our commitment to equality of opportunity and diversity, to explain the standards of behaviour we expect, and to make clear how everyone connected with SB4 will be treated fairly – from the point of application, throughout employment, and in the everyday working environment.

This policy applies to all stages of the working relationship and to everyone acting for or on behalf of SB4, including directors, employees, site-based staff, apprentices, agency and temporary workers, self-employed operatives, subcontractors, consultants, job applicants and visitors, across all of our projects in England and Wales and in the commercial, residential, agricultural and fit-out sectors. It applies whether SB4 is acting as Principal Contractor, Contractor or Project Management Consultant.

3. Our Commitment

SB4 is committed to:

- providing equality of opportunity in recruitment, employment, training, development and progression;
- creating a working environment free from discrimination, harassment, bullying and victimisation, in which everyone is treated with dignity and respect;
- making decisions on the basis of merit, ability and the genuine requirements of the role;
- valuing diversity and drawing on the widest possible pool of talent;
- making reasonable adjustments so that disabled applicants and workers are not placed at a disadvantage;
- treating any breach of this policy seriously, through our disciplinary procedures where appropriate.

4. Legal Framework

We comply with all applicable equality and employment legislation. The principal legislation we have regard to includes:

- **Equality Act 2010** – the core statute prohibiting discrimination, harassment and victimisation in relation to nine protected characteristics;
- **Worker Protection (Amendment of Equality Act 2010) Act 2023** – which, since 26 October 2024, places a proactive duty on all employers to take reasonable steps to prevent sexual harassment of their workers;
- **Employment Rights Act 2025** – which is being introduced in phases and further strengthens protection against harassment (see Section 9);
- Employment Rights Act 1996 and associated employment protections;
- Human Rights Act 1998, and our related obligations under UK GDPR and the Data Protection Act 2018 when handling personal information.

5. Protected Characteristics

Under the Equality Act 2010 it is unlawful to discriminate against a person because of any of the following nine protected characteristics. SB4 is committed to protecting everyone against discrimination on these grounds:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race (including colour, nationality, and ethnic or national origin);
- religion or belief (including lack of belief);
- sex;
- sexual orientation.

6. Forms of Discrimination

We recognise and seek to prevent the following forms of unlawful conduct:

- **Direct discrimination** – treating someone less favourably than another because of a protected characteristic.
- **Indirect discrimination** – applying a provision, criterion or practice that puts people who share a protected characteristic at a particular disadvantage, where this cannot be objectively justified.
- **Harassment** – unwanted conduct related to a protected characteristic (or 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 made, or supported, a complaint about discrimination.
- **Discrimination arising from disability** – treating someone unfavourably because of something connected with their disability, where this cannot be justified.
- **Failure to make reasonable adjustments** – not taking reasonable steps to remove a disadvantage faced by a disabled person.

7. Recruitment and Selection (Application Stage)

We recruit on the basis of merit and the genuine requirements of the role. At every stage of the application process we will:

- base job descriptions and person specifications on the actual requirements of the role, avoiding any criteria that could unfairly exclude particular groups;
- advertise roles in a way that encourages applications from a wide range of candidates and contains no discriminatory wording;
- assess applicants objectively against consistent, role-related selection criteria;
- not ask about health or disability before a job offer is made, other than in the limited circumstances permitted by law (for example, to establish whether reasonable adjustments are needed for the selection process);
- make reasonable adjustments to the recruitment and interview process for disabled applicants on request;
- carry out right-to-work checks consistently and lawfully, applied to all candidates in the same way;
- keep recruitment decisions and the reasons for them recorded appropriately.

8. Employment, Training and Progression

Once someone is engaged by SB4, we are committed to fair treatment throughout their working relationship with us. This means:

- equal access to training, development, apprenticeships and opportunities to progress;
- fair and consistent decisions on pay, terms, allocation of work and benefits;
- fair and non-discriminatory application of our procedures for performance, conduct, discipline, grievance, redundancy and dismissal;
- genuine consideration of flexible or alternative working arrangements where practicable;
- support for employees who become disabled, are pregnant, or return from family-related leave, so that they are not disadvantaged.

9. Dignity at Work – Harassment, Bullying and Victimisation

Everyone at SB4 has the right to be treated with dignity and respect. We do not tolerate harassment, bullying, victimisation or any behaviour that undermines a person's dignity, whether it takes place on site, in the office, at work-related events, or online.

We take our responsibilities around sexual harassment particularly seriously. As an employer we are under a legal duty to take **reasonable steps to prevent the sexual harassment of our workers**, including harassment by third parties such as clients, customers, suppliers and members of the public. From 1 October 2026 this duty is due to be strengthened to a duty to take **all reasonable steps**, with expanded liability for third-party harassment across all protected characteristics. We assess the risks, act to reduce them, and keep our approach under review.

Bullying – offensive, intimidating, malicious or insulting behaviour that misuses power to undermine or humiliate – is likewise unacceptable, whether or not it is linked to a protected characteristic. Anyone found to have harassed, bullied or victimised another person may face disciplinary action up to and including dismissal.

10. Reasonable Adjustments and Disability

We are committed to supporting disabled applicants and workers. Where a disabled person would otherwise be placed at a substantial disadvantage, we will consider and make reasonable adjustments – for example to the recruitment process, working arrangements, equipment, or the physical working environment – so far as it is reasonable to do so. Anyone who feels they may benefit from an adjustment is encouraged to raise this so that it can be discussed in confidence.

11. Roles and Responsibilities

Equality and fair treatment are the responsibility of everyone at SB4. Specific responsibilities are allocated as follows:

Role	Responsibility
Managing Director (Anthony Litchfield)	Holds overall accountability for equal opportunities, sets the tone from the top, and approves this policy on behalf of the Board.
Directors and Managers (incl. Construction Director and Project/Site Managers)	Apply this policy fairly and consistently in recruitment, day-to-day management and on site; challenge unacceptable behaviour and act on concerns.
Head of Compliance & Project Coordination (Adam Baxter, IMS Management Representative)	Maintains this policy within the IMS, supports managers, arranges awareness/training, and reviews the policy at least annually.
All staff, workers and partners	Treat colleagues, clients and others with dignity and respect, comply with this policy, and report any discrimination, harassment or bullying they experience or witness.

Note: names are shown here for clarity; roles rather than individuals hold the responsibilities.

12. Raising Concerns

Anyone who believes they have been discriminated against, harassed, bullied or victimised, or who witnesses such behaviour, is encouraged to raise it. Concerns can be raised informally in the first instance, or formally through our grievance procedure, with a line manager, the Head of Compliance (Adam Baxter) or any director.

All concerns will be taken seriously, treated sensitively and, so far as possible, in confidence. No one will be subjected to any detriment or disadvantage for raising a genuine concern in good faith, even if it is not

ultimately upheld. Malicious or knowingly false allegations, however, may be treated as a disciplinary matter.

13. Monitoring, Review and Continual Improvement

This policy is reviewed at least annually as part of our management review cycle, and sooner if there is a significant change in our business or in the law. We monitor the operation of the policy proportionately to our size – including through the handling of any concerns raised and through awareness and training – and are committed to improving our practices over time so that equality of opportunity is a genuine and everyday reality at SB4.

14. Approval

This policy is approved and endorsed by the Board of SB4 Construction Group Ltd and has effect from the issue date shown above.

Signed	
Name	Anthony Litchfield
Position	Managing Director
Date	07 July 2026