

EQUALITY, DIVERSITY AND INCLUSION POLICY

Our Commitment

The business values a diverse workforce and the contribution each individual makes. We are committed to promoting inclusivity, equality and diversity in our policies, practices and procedures.

Our objective is to be more open, diverse and inclusive. We are committed to providing a great working environment which recognises that people from different backgrounds, experiences and abilities can bring fresh ideas and innovation.

We acknowledge the full breadth of people who work for us, and aim to reflect that variety within our staff. We welcome different and fresh ways of thinking, encourage innovation and a culture of speaking up where things can be done better.

By inclusion we mean that everyone that works for Walker Construction has a contribution to make, and we will strive to create an environment that will be receptive, welcoming and inclusive of all our people. For example we use conference calling to reduce employee travel, we have a flexible working policy, which can allow people who have carer responsibilities to look after people who depend on them, and we can make reasonable adjustments so that disabled people who are dyslexic, or have diabetes, or depression, or mobility impairment can work for us.

By promoting equality, diversity and inclusion we will be helping everyone to perform at their best and realise their potential.

This policy applies to the company's dealings with all its people as well as others engaged by or who work with us including, clients, job applicants and other third parties.

Discrimination can take a variety of forms including direct discrimination, indirect discrimination, harassment, and victimisation and, for those with a disability, discrimination arising from disability and a failure to make reasonable adjustments.

We believe in treating everyone equally and with the same attention, courtesy and respect regardless of their age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex and sexual orientation. These will be referred to in this policy as the "protected characteristics".

Responsibilities

Everyone working at Walker Construction is responsible for ensuring that our values and behaviors are demonstrated through our actions and the way we conduct our business.

The Managing Director supported by the Board of Directors has overall responsibility for the effective implementation and operation of this policy. This policy is also supported by the company's Diversity and Inclusion Champions.

All employees are expected to pay due regard to the provisions of this policy and should ensure compliance with it when undertaking their jobs or representing the business.

Acts of unlawful discrimination by Directors, employees or others may result in disciplinary action, which in serious cases could result in summary dismissal. Please see our

Disciplinary Procedure for more information. Failure to comply with this policy will be treated in a similar fashion.

Human Resources

Human Resources is responsible for ensuring that managers and employees alike are aware of the commitment to diversity and inclusion and to work to achieve a more open, inclusive and diverse company. Human Resources will:

- Be the custodians of equality, diversity and inclusion and provide constructive challenge when behaviors do not promote or demonstrate openness, inclusion and diversity.
- Coach and support managers to take responsibility for their own behaviors and the behaviors of those they manage.
- Ensure regular review and development of this policy as appropriate.

Managers

Responsibilities apply to those who manage employees and to those who are involved in recruitment, promotion, training and development. Managers are expected to:

- Ensure that policies and procedures relating to equality, diversity and inclusion are implemented and communicated to all existing employees and new employees when they begin working for us.
- Promote a professional and positive work environment by being inclusive and open and challenging behaviour or decisions that breach this policy.
- Raise awareness of equality, diversity and inclusion, act as a role model for others and develop personal skills to promote diversity and inclusion and handle issues relating to bullying, harassment and discrimination.

Employees

All employees are expected to put this policy into practice. We require a personal commitment from every employee to treat each other with respect and dignity and set an excellent standard of behaviour to others.

- Ensure they understand the value and the benefits of equality, diversity and inclusion.
- Tell their line manager about any instances of discrimination or any perceived problems in relation to employment.
- Comply with the equality, diversity and inclusion policy.

Employment and Training

As an employer, it is our policy to treat all employees and job applicants equally and fairly and not to discriminate unlawfully against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, selection for redundancies, work allocation and any other employment related activities.

Recruitment and Selection

We recognise the benefits of having a diverse workforce and will take steps to ensure that:

- It endeavors to recruit from the widest pool of suitably qualified candidates possible.
- Employment opportunities are open and accessible to all on the basis of their ability, skills, experience, appropriate qualifications and aptitude for the job.
- All recruitment agencies acting on our behalf align with our equality and diversity requirements and their own requirement not to unlawfully discriminate.

Terms and Conditions of Work

We will treat individuals equally, to create a working environment which is free from unlawful discrimination and which respects, where possible, the diverse backgrounds and beliefs of partners and employees.

Working arrangements such as working hours, maternity and other leave arrangements, performance review systems and any other conditions of employment will not unlawfully discriminate against any employee in a way that cannot be justified on the basis of the protected characteristics.

Where appropriate, the business will endeavour to provide appropriate facilities and working arrangements which take into account the specific needs of employees which arise from their having any of, or being associated with, the protected characteristics.

Promotion and Career Development

Promotion within the company is made without reference to any of the protected characteristics and will be based solely on merit.

The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unlawful discriminatory impact on any particular group which cannot be justified.

While positive action measures may be taken in accordance with the relevant anti-discrimination legislation to encourage under-represented groups to apply for promotion opportunities, recruitment or promotion to all jobs will be based solely on merit.

All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. The business may take appropriate positive action (as permitted by the anti-discrimination legislation) to provide special training and

support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

Appropriate Behaviour

It is expected that everyone in the company will conduct themselves in an appropriate manner, which can be characterised by:

- Treating others with dignity, trust and respect.
- Having an awareness of the effects our behaviour may have on others.
- Working collaboratively to achieve objectives.
- Communicating openly and honestly, clearly stating what we mean and what we expect of others.
- Giving and receiving constructive feedback as part of normal day-to-day activities, that is evidence based and delivered appropriately.
- Starting from the assumption that everyone is working to the best of their abilities, taking account of their current stage of their professional development.

Unacceptable behaviour (including bullying, harassment and victimisation) may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. Unacceptable behaviour does not have to be face-to-face; it may take many forms such as written, telephone or email communications or through social media. Unacceptable behaviour will be dealt with in line with the company's Disciplinary Procedure.

All employees are expected to set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives in relation to equal opportunity, diversity and inclusion.

Promoting and Communicating Equality and Diversity

We will ensure that this policy is put into practice and we will take the following steps:

- Provide regular communication about equality, diversity and inclusion via newsletters, team meetings, and notice boards.
- Establish monitoring systems to help us understand where it is making progress and where we need to improve.
- Establish diversity and inclusion champions throughout the business to promote equality, diversity and inclusion,
- Provide training and development on the positive impact of equality, diversity and inclusion.
- Create an environment where people can challenge discriminatory behaviours, in particular we will have a zero tolerance of ageism, classism, disability, homophobia, racism, and sexism.
- Opportunities for employment, promotion, transfer and training will be advertised widely. All applicants are welcomed, irrespective of gender or marital/family status,
- race, colour, nationality, ethnic or national origin, disability, age, sexual orientation, religion, belief or any other characteristics protected by law.

This policy is published on our intranet and is also available to job applicants on the company website. In addition, diversity, inclusion and equality training will be provided on a regular basis.

All those who act on the company's behalf will be informed of this policy and will be expected to comply with it.

In all its dealings, with clients and other third parties, the business will seek to promote the principles of diversity, inclusion and equality.

The business will make every effort to reflect its commitment to diversity, inclusion and equality in its marketing and communication activities where appropriate.

Implementing the Policy

Complaints of Discrimination

The company will investigate all complaints of unlawful discrimination made by employees, clients or other third parties in relation to the company and take action where appropriate. All complaints will be investigated in accordance with the company's grievance procedure and the complainant will be informed of the outcome.

There will be no victimisation or retaliation against employees who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the company's disciplinary procedure.

Monitoring and Evaluation

- The company collects, reports and monitors diversity data. This allows us to see the effectiveness of equality and diversity initiatives that have been implemented, as well as helping us to take appropriate steps to avoid unlawful discrimination. Having up-to-date and comprehensive data enables us to target and support initiatives within the company and illustrates our commitment to diversity and inclusion.
- In particular, the company will, as appropriate and where possible, monitor and record:
 - The protected characteristics, whether someone has caring responsibilities and their educational background (to measure social mobility), at different levels of the firm. This data is collected on a voluntary basis through the company's annual diversity survey. The HR system securely holds age, gender, disability, ethnic and national origins, sexual origination, religion or belief and disability data for employees.
 - On a voluntary and anonymous basis the gender, ethnic group, disability, sexual orientation and age on of all applicants as part of the recruitment process for all jobs and training contracts. This data is kept separate from the candidate's actual job application.
 - The number and outcome of any complaints of unlawful discrimination made by employees, clients and other third parties in relation to the company and its business.

- To support the company's business strategy, the Diversity and Inclusion champions will set diversity and inclusion objectives. With specific priorities in mind the Diversity and Inclusion group will:
 - Set specific areas of focus every 18-24 months
 - Collect, monitor and report diversity and inclusion data
 - Plan initiatives around agreed actions
 - Execute those initiatives
 - Evaluate initiatives to establish if they were successful.

Appendix: Forms of Discrimination

Protected characteristics under the Equality Act 2010 (the "Act") are:

- 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.
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Direct discrimination – occurs where a person is treated less favourably than another person because:

- They have a protected characteristic.
- They are thought to have a protected characteristic.
- They associate with someone who has a protected characteristic.

Indirect discrimination – occurs when a provision, criterion or practice that applies to everyone but adversely affects people with the protected characteristic more than others and is not justified.

Discrimination arising from disability – occurs where a person is treated unfavourably because of something arising in consequence of their disability and that treatment is not justified.

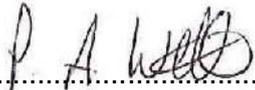
Failure to make reasonable adjustments – occurs where the firm fails to take such steps (adjustments) as are reasonable to alleviate disadvantages caused by a disability.

Harassment occurs when unwanted conduct related to a relevant protected characteristic takes place with the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve physical acts or verbal and non-verbal communications and gestures. Harassment is dealt with in our anti-harassment and bullying policy.

Victimisation - occurs when an employer subjects a person to a detriment because the person has carried out (or the employer believes they have or may have carried out) what is referred to as a 'protected act'. A protected act includes:

- Bringing proceedings under the Act.
- Giving evidence or information in proceedings brought under the Act.
- Doing anything which is related to the provisions of the Act.
- making an allegation that another person has done something in breach of the Act.

Signed:


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Phil Webb
Managing Director

Dated: 5th October 2018