

POLICY:

Soil Engineering Geoservices Limited are committed to eliminating discrimination and harassment, and encouraging diversity amongst our workforce. Our aims and objectives are to create a working environment in which there is no unlawful discrimination or harassment, and all decisions are based on merit and for all of our employees to be happy and engaged.

Status of this policy

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Eligibility

This policy applies to ALL employees, Subcontractors and job applicants.

Proactive Approach

All employees are required to read and accept our policies, working practices and approach in relation to discrimination, bullying and harassment, including sexual harassment, and sign to accept to the following, as part of onboarding:

- Equality Policy
- VINCI Code of Ethics and Conduct
- VINCI Human Right Guide
- Whistleblowing Policy

This is supported by our e-learning on Fairness, Inclusion and Respect, which is done at induction, and regular intervals thereafter. This is further supported by face to face workshops at regular intervals.

All visitors to our sites and offices receive an induction which includes a statement relating to discrimination, bullying and harassment.

Toolbox Talks on this subject and our expectations regarding behaviour and conduct as a business, are delivered regularly across our worksites which all employees and contractors are required to attend.

What is discrimination?

Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics'):

- age
- disability
- gender re-assignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Discrimination can take a number of forms:

·Direct discrimination is when someone is treated worse than someone else just because of a protected characteristic. For example, it would be direct discrimination if a manager excludes an employee from a training course just because they are gay.

·It is also direct discrimination when someone is treated worse than someone else because they associate with someone with a protected characteristic or because they are perceived to have a protected characteristic. For example, it would be direct discrimination if an employee ostracised a colleague because the colleague has a gay flatmate or because they think the colleague is gay.

·Indirect discrimination is when an apparently neutral practice or requirement disproportionately disadvantages one group and cannot be justified by the needs of the business. For example, imposing a requirement that job applicants must speak fluent English disproportionately disadvantages non-English groups and would be unlawful unless it could be justified on genuine business grounds.

·It is also discrimination when a disabled person is treated unfavourably because of something connected to their disability and this cannot be justified by the needs of the business or when the business fails to make reasonable adjustments for a disabled person.

Our approach to our employees and contractors

All employees and contractors have a duty not to discriminate against each other and not to help anyone else do so. We will not tolerate discrimination in our workforce.

Recruitment and selection

We aim to ensure that job requirements and job selection criteria are clear and based only what is required to get the job done effectively. We will avoid making stereotypical assumptions based on protected characteristics about who is able to do a particular job.

We aim to ensure that no job applicant is placed at a disadvantage by practices or requirements which disproportionately disadvantage protected groups and which are not justified by the demands of the job.

Promotion and training

Promotion and training decisions will be made on the basis of merit. We will not unlawfully discriminate against any employee in making promotion or training decisions. We believe all employees should have an equal opportunity to progress and develop.

We will try to ensure that promotion opportunities are brought to the attention of as wide a group of employees as possible.

Training needs will be identified through regular reviews and appraisal discussions.

Working conditions and terms of employment

We aim to ensure that our terms of employment, benefits, facilities and policies are free from unlawful discrimination. We will review our benefits and facilities regularly to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

Should any employee wish to access an appropriate quiet place (or prayer room) to undertake their religious observance, please speak to your Line Manager or HR, who will seek to find an available meeting room or quiet place, where possible, and where allowing the rooms use for prayer, does not cause disruption for other workers or the business.

We will ensure that decisions made under our disciplinary, performance improvement and absence management policies are carried out fairly and without discrimination.

Disabled employees

We will make adjustments to accommodate disabled employees where possible and reasonable. For example, we may be able to provide extra equipment or support, or re-arrange duties, and we can make changes to our premises in appropriate cases. If you think you may have a disability, you are encouraged to tell the business about this so that we can explore what adjustments might be appropriate.

Gender Management

We are committed to improving our gender balance at all levels of the organisation aiming to become a better gender balanced employer. To support this, we need to focus on how the industry and Bachy Soletanche Group (this includes all subsidiary companies: Bachy Soletanche, Soil Engineering, Menard, Sixense) in particular attract more women into employment.

To help do this we will:

- Strengthen our links with STEM organisations, to attract talent and build engagement from grass roots.
- Actively participate in events such as International Women's Day to help promote diversity.
- We will facilitate better progression routes into senior roles for our existing employees to enable all employees to reach their full potential.
- We will improve our ways of working to embed a healthy work-life balance for everyone. Whilst we currently have robust flexible working and shared parental leave policies, and offer flexible solutions to fit with personal circumstances, including job shares, part time contracts and flexible hours, we need to more actively promote these amongst women and men to improve take-up. We need to see a culture shift in the view that flexible working is not an exclusively female domain but something that anyone can do to achieve the best work/life balance for them.
- Select a pool of diverse candidates for development programs with the aim of enhancing the potential for diverse pools of candidates for senior positions.
- We will continue to conduct regular audits of pay and benefits to ensure that our pay structure remains gender neutral, market competitive and focused on roles.

Training on equality

We will train our managers and those responsible for recruitment and all our employees on understanding and avoiding discrimination. We will continue our 'Fairness Inclusion and Respect' eLearning training to all employees which is designed to raise awareness of diversity and inclusion and promote behaviours that encourage a more collaborative and welcoming working environment, to build on performance and innovation.

Our relationships with visitors, customers and suppliers

You must not discriminate against any of our visitors, customers or suppliers. Equally, we expect our visitors, customers and suppliers not to discriminate against you and we will take appropriate action against any visitor, customer or supplier found to have done so.

What to do if you have been discriminated against

If you believe you may have been discriminated against, please tell us. You can speak informally with your manager or to HR. If you want to make a more formal complaint, you are encouraged to raise the matter through our Grievance procedure.

Allegations of potential breaches of this policy will be treated seriously. Employees and contractors who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under our disciplinary procedure.

What will happen if you act in a discriminatory way?

If, after investigation, we decide that you have acted in breach of this policy you may be subject to disciplinary action up to and including dismissal. This applies to all employees.

The company's position on bullying and harassment, including sexual harassment

- **Harassment, including sexual harassment**, is unwanted conduct affecting that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This includes any actions or comments which are viewed as demeaning and unacceptable to the recipient.
- **Bullying** is deliberate action or behaviour directed towards another person that has the effect causing pain and distress to the victim.

Bullying or harassment can take many forms; it may be by a one to one situation or involve groups of people. Whatever the form of harassment, it will be unwanted behaviour which is unwelcome and unpleasant.

All employees and contractors, have a duty not to bully or harass each other, nor to help anyone else to do so.

We will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace, whatever the seniority of the perpetrator and whether the conduct is a one-off act or repeated course of conduct, and whether done purposefully or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in the bringing of a complaint of harassment or bullying. You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be liable to compensate the victim. In some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.

We will take appropriate action if any of our employees or contractors are bullied or harassed by our customers or suppliers.

If, after investigation, we decide that you have harassed or bullied another employee or contractor, then you may be subject to disciplinary action, up to and including dismissal. Retaliation or victimisation will also constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal.

Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially. Employees and contractors who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

False accusations of harassment or bullying can have a serious effect on innocent individuals. You have a responsibility not to make false allegations. False allegations made in bad faith will be dealt with under our disciplinary procedure.

What you should do if you are being bullied or harassed by a colleague, customer or supplier

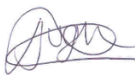

If you are being bullied or harassed by a colleague, customer, supplier or someone else with whom you come into contact at work, please raise this with your immediate manager and/or HR Department. We will then decide how best to deal with the situation, in consultation with you.

You can also contact our third party Whistleblowing service, Protect: Tel: 020 3117 2520 or online at: <https://protect-advice.org.uk/>

We will review our Equality Policy on a regular basis.

The Company reserves the right to vary or withdraw this policy at its discretion.

Attachments	Links
Vinci Code of Ethics Respect at Work E-Learning Module Dignity at Work Equality Act Manager Session	GRIEVANCE PROCEDURE DATA PROTECTION POLICY

Approved by:  Louise Pugh (Group HR Manager)	Director Approval:  Tristan Llewellyn (Managing Director)
<p><i>The intranet version is the 'Controlled' copy of this document, once printed it becomes 'Uncontrolled'. Please check the company intranet site to ensure that the latest version is held.</i></p>	