

## Equal Opportunities, Diversity and Equality Policy

### **Purpose and scope**

Parias Construction & Interiors Ltd is committed to providing a fair, inclusive and safe workplace, free from unlawful discrimination, harassment and victimisation. This policy applies to: employees, workers, apprentices, job applicants, agency staff, contractors, volunteers, work-experience students, and anyone carrying out work on our behalf on PCI or client premises.

PCI will apply this policy across the full employment lifecycle: recruitment and selection, onboarding, pay and benefits, training, promotion, performance management, working arrangements, grievance/discipline, redundancy and exit.

### Legal framework

- **Equality Act 2010** — the primary anti-discrimination law in Great Britain. It consolidates previous legislation and sets out the nine protected characteristics.
- **EHRC Employment Statutory Code of Practice** — authoritative guidance for employers and tribunals on complying with the Act.
- **Worker Protection (Amendment of Equality Act 2010) Act 2023** — introduces a positive duty on employers to take reasonable steps to prevent sexual harassment, in force from 26 Oct 2024, with up to 25% compensation uplift if breached.
- **ACAS guidance/codes** — practical guidance on discrimination and flexible working (including the day-one right to request flexible working and a two-month decision period).
- **UK GDPR / Data Protection Act 2018** — rules for handling special category data (for example, health, ethnicity, religion, sexual orientation) in equality monitoring and case handling.

### **Our commitments**

PCI will:

- Treat everyone with dignity and respect and not discriminate on any unlawful ground.
- Foster a zero-tolerance culture for harassment, including sexual harassment, bullying and victimisation; take early, proportionate action to prevent, address and remedy concerns.
- Take reasonable steps to prevent sexual harassment, including third-party risks on sites and client premises, and regularly evaluate the effectiveness of our measures.
- Make reasonable adjustments for disabled applicants and workers and consider individual needs (including neurodiversity and mental health).
- Consider flexible working requests fairly, from day one, within statutory timeframes and ACAS guidance.
- Provide manager training on equality, inclusive management, menopause awareness, and preventing/handling harassment.
- Collect limited, proportionate equality monitoring data (voluntary), protect it under UK GDPR, and use it only to improve equality outcomes.
- Use positive action lawfully (where evidence supports it) to reduce disadvantage or under-representation — never quotas or unlawful positive discrimination.
- Hold our supply chain and labour-only subcontractors to equivalent EDI standards in contracts and site rules. (Industry good practice)

### Protected characteristics and prohibited conduct

Protected characteristics under the Equality Act 2010 are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Prohibited conduct includes:

- Direct discrimination, indirect discrimination, harassment and victimisation (definitions per the Act and EHRC guidance).
- Sexual harassment (unwanted conduct of a sexual nature that violates dignity or creates a hostile environment) and less favourable treatment for rejecting/submitting to such conduct.

PCI may be vicariously liable for discriminatory acts of its workers unless they can show they took all reasonable steps to prevent them.

### Roles and responsibilities

- **Board and Directors** — set the tone; approve policy; ensure resources; review EDI metrics and actions annually.
- **Managers and site leaders** — model inclusive behaviour; prevent and address bullying/harassment; implement adjustments; ensure fair decisions; escalate concerns promptly.
- **All workers** — follow this policy; complete training; challenge inappropriate behaviour; report concerns; support colleagues.
- **HR** — keep procedures up to date; provide training; monitor EDI data; coordinate reasonable adjustments; coordinate fair recruitment and grievance/disciplinary processes.

### Fair employment practices

#### **Recruitment and selection**

- Write job descriptions and person specifications that are objective and job-related.
- Advertise inclusively and avoid criteria that may cause indirect discrimination unless objectively justified (for example, unnecessary qualifications or working patterns).
- Provide adjustments in the application and interview process on request; accept comparable overseas qualifications.
- Manage agencies and labour suppliers to uphold this policy.

#### **Pay, benefits and progression**

- Ensure equal access to training, promotion and benefits.
- Apply fair and transparent criteria in performance management and promotion decisions, mindful of indirect discrimination risks.

#### **Working arrangements and flexible working**

- Consider day-one flexible working requests; respond within 2 months; consult before refusing; and only refuse for a permitted business reason, in line with the ACAS Code.

### **Redundancy, discipline and grievance**

- Apply processes consistently and without discrimination; ensure adjustments or support where needed; and protect complainants/witnesses from victimisation.

### **Preventing and addressing harassment (including the new legal duty)**

#### **Our preventative measures**

PCI will assess risks, implement controls, train staff, and actively monitor culture to prevent sexual harassment — including risks from third parties (e.g., on construction sites, client premises, public interfaces). PCI will review controls regularly and adapt them as needed.

Examples of reasonable steps include:

- Robust, well-publicised anti-harassment policy and site rules; clear standards for behaviour on sites and at work-related events.
- Risk assessments targeting hotspots (e.g., lone working, night shifts, site welfare areas, client-facing roles, travel and social events).
- Regular, meaningful training for all staff and managers (not a one-off tick-box), with refreshers and practical scenarios.
- Visible reporting routes, including anonymous options; prompt, trauma-informed case handling; learning reviews and trend analysis.

#### **Reporting and support**

- How to report: Speak to your manager, a Director, or HR; use the dedicated email, or raise a grievance.
- PCI will respond promptly, fairly and confidentially, take proportionate action, and protect individuals from victimisation.

### **Adjustments and inclusion**

#### **Disability and health (including neurodiversity and mental health)**

PCI will consult with individuals and provide reasonable adjustments (e.g., modified duties, assistive tech, flexible hours, phased return, relocation of work area) to remove substantial disadvantage.

#### **Pregnancy, maternity, and family-friendly needs**

PCI will ensure fair treatment in line with the Equality Act and consider practical support, risk assessments and flexible arrangements.

#### **Menopause support**

PCI recognise menopause (including peri-menopause) can affect work; PCI will offer adjustments (temperature, uniforms/PPE options, breaks, flexible hours) and train managers to hold supportive conversations. Where symptoms have a substantial and long-term impact, they may amount to a disability; PCI will consider reasonable adjustments.

### **Religion or belief**

PCI will respect observance needs where reasonably practicable (e.g., prayer time/space, dress and PPE accommodations compatible with safety, leave for festivals).

### **Trans and non-binary inclusion**

PCI will treat trans and non-binary colleagues with dignity and respect, protect privacy, and handle names/pronouns and records sensitively. Gender reassignment is a protected characteristic, and discrimination or harassment on this ground is unlawful. Case-by-case decisions (e.g., facilities, uniforms) will be made lawfully, proportionately and with sensitivity for all affected.

### **Positive action**

Where our data and experience show disadvantage or under-representation, PCI may use positive action (e.g., targeted outreach, training) under sections 158/159 Equality Act, ensuring any measures are proportionate and never amount to unlawful positive discrimination or quotas.

### **Data protection, monitoring and privacy**

PCI may invite staff and applicants to provide voluntary equality monitoring data to assess fairness and target interventions. Where this includes special category data (e.g., ethnicity, health, religion, sexual orientation), PCI will identify a lawful basis under Article 6 UK GDPR and a separate Article 9 condition, keep data secure and minimised, and (where relevant) maintain an Appropriate Policy Document and conduct a DPIA. PCI will also explain purpose, access, retention and anonymisation in our privacy notice.

Where any workforce monitoring technology is used (e.g., cameras on sites for safety, time/access systems), PCI will ensure transparency, necessity, proportionality and a suitable lawful basis in line with ICO guidance.

### **Contractors, supply chain and client sites**

Our subcontractors, labour suppliers and on-site partners must comply with this policy and applicable law. Site inductions and RAMS will reflect behaviour standards, welfare arrangements and harassment-prevention measures; breaches may lead to removal from site and contract action. (Industry good practice)

### **Training, communication and review**

- Mandatory training for all staff; enhanced training for managers, supervisors, site leads and hiring managers.
- Annual review of EDI metrics, cases and actions; policy reviewed at least annually or on legal change (whichever is sooner).

**Marcus Parias**

Operations Director.....  
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