

TRAD GROUP POLICY
<p>EQUAL OPPORTUNITIES, DIVERSITY AND EQUALITY POLICY</p>

03	23-Feb-18	General revision and removal of MTD name (as this company was purchased by TRAD Scaffolding Contractors)
02	26-Jul-17	General revision
01	22-May-16	Inclusion of MTD Scaffolding Limited into the TRAD Group
00	01-Apr-16	First issue (amalgamation of TRAD Sister Companies' existing Policies into a Group Policy)
REV	DATE	STATUS / DESCRIPTION OF CHANGES

DOCUMENT NO.	TRAD-GROUP-POL-002
---------------------	---------------------------

STATEMENT

This Group Policy is designed to prevent discrimination and to attract the best employees and workers. This policy complies with The Employment Equality (Age) Regulations and the Equality Act and any other applicable legislation and statutory codes of practice and gives guidance to our Directors and Managers on the elimination of discrimination and the promotion of equal opportunity to encourage members of, for instance, ethnic minorities to apply for jobs, seek promotion, and take up any of the company's training opportunities. The term "manager" includes any staff member, including Directors, Depot Managers, Contracts Managers/Supervisors, Yard Managers and Line Managers who are authorised by the company to employ people (including promotion/appointment of existing employees).

Note: this TRAD Group Policy (underpinned by the ALTRAD Code of Conduct) is applicable to every company within the Trad Group: Trad Scaffolding Contractors, Trad Hire & Sales Ltd, and Trad Safety Systems Ltd, and all TRAD companies will ensure full compliance.¹ The word "company" will be used throughout as every one of the TRAD companies has slightly different procedures and processes, which nonetheless adhere to policy.

To ensure that diversity is embedded in our company culture reflected in our staff and to better serve our customers/clients, the company will endeavour to:

- inform managers and employees via this policy of the potentially discriminatory effects of imposing practices, conditions, and criteria on minority groups, and the importance of being able to justify decisions;
- brief staff at induction and inform staff of any amendments to this policy with an annual update (and on updates to other applicable policies);
- attract applications from all sections of society irrespective of race, gender, marital/civil partnership status, age, disability, religion or belief, colour, national origin or sexual orientation and ensure fair treatment throughout the recruitment process, including ensuring advertisements are written to include the fact there will be no discrimination (such as racial, sexual, age discrimination);²
- improve performance in the job, develop skills and prepare all individuals for other roles and responsibilities through effective appraisal and training processes;
- ensure that employment decisions are based on business needs and the individual's ability to do a job;
- enhance decision-making and innovation by encouraging interaction and involvement;
- increase our ability to relate to existing and potential customers/clients wherever they exist;
- identify the various behaviors and barriers that discrimination can take, and understand the negative effect these can have on the company and its employees and customers/clients;
- monitor the application of this policy, and work towards eliminating any discriminatory practices which may be limiting the company's ability to achieve its objectives.³

Responsibility

To be successful, this policy will be implemented group-wide and therefore commitment is required from the whole workforce. Senior management has responsibility for ensuring that this policy underpins all aspects of company policy and for promoting an organisational culture that is supportive of the benefits of diversity.

Line managers will have an important role to play in ensuring that policies, procedures and processes relating to diversity are implemented and communicated to all existing staff and new staff on their

¹ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.

² Where the brevity of advertisement space in newspapers, for example, does not allow the inclusion of statements that the company will not discriminate, managers will ensure that the company's policy is brought to the attention of applicants and that the company's policy is adhered to in all aspects.

³ Directors will monitor the policy and pass on any issues to the Group HR Director who will investigate and report to the TRAD Group CEO.

commencement. This will be achieved through new starter induction and continuation training. Managers will promote a professional and positive work environment by ensuring that this policy is put into practice by challenging behaviour, actions or decisions that breach the policy.

All individual employees/workers have a responsibility to comply with this policy and to be aware of the various behaviours and barriers that discrimination can take, and to understand the negative impact these can have on the company and colleagues. All employees will co-operate with management in the elimination of any discriminatory practices which may be identified and any instances of apparent discrimination will be reported immediately to a line manager.

Unlawful Discrimination

It is unlawful to discriminate against people at work (for instance, on the grounds of their sex, sexual orientation, status as a married person or a civil partner, race, colour, age, nationality, ethnic origin, religion, gender reassignment, political or other beliefs or because of a disability, pregnancy, childbirth, or subsequent maternity leave or because they are a member or non-member of a trade union). It is also unlawful to discriminate against part-time or home workers. The company will comply with all relevant legislation and no individual will be unjustifiably discriminated against.

Age

The company is fully committed to promoting age diversity. In valuing the contribution of its employees, regardless of age, the company will seek to eliminate age 'stereotyping' and discrimination on the basis of age. The underlying premise of this is that employees will be assessed on the basis of their skills, ability and potential, not their age. This means that employment opportunities and personal/career development will be available, irrespective of a person's age. This will involve:

- basing employment decisions on objective, job-related criteria;
- encouraging staff of all ages to develop their careers;
- ensuring that staff of all age groups participate in training, and have the chance to improve their skills and experience;
- avoiding assumptions about the physical abilities and career intentions of older job applicants or employees.

The Employment Equality (Age) Regulations covers people of all ages. It is unlawful to discriminate against young workers as well as against older workers. There is no statutory upper age limit on the right to claim unfair dismissal or to receive redundancy payments. The default retirement age is 65, making compulsory retirement below 65 unlawful unless objectively justified. In addition, all employees have the right to request to work beyond 65 (or any other retirement age set by the company) and the company will give such requests consideration.

Equal pay

Men and women doing equal work and work rated as of equal value are entitled to equal pay.

Race, religion or belief

The company recognises it is unlawful to discriminate against a job-seeker, worker or trainee on the grounds of race, colour, nationality and ethnic or national origins or because of their religion or belief or lack of religion or belief. The company is sensitive to the cultural and religious needs of employees and makes provision to accommodate any formal requests that are made.

Disability

The company recognises its responsibility towards disabled employees and seeks to eliminate unjustified discrimination on the grounds of disability by:

- recognising the wealth of talent and skill possessed by disabled people;
- interviewing all disabled job applicants who meet the minimum selection criteria for a job vacancy and consider them on their abilities;
- ensuring that all disabled employees are smoothly and effectively inducted into the company;
- identifying and providing any 'reasonable adjustments' to working arrangements or the working environment necessary for the effective performance of their job;
- making every effort to retain employees who become disabled whilst in the employment of the company.

Monitoring

The company will maintain records of the age, race, gender, marital/civil partnership status, and disability of job applicants and existing employees. Any patterns of under representation (for example, where one gender or race appears to have a consistently reduced chance of promotion) will be fully investigated and any discriminatory practices identified and eliminated.

Bullying and Harassment

All staff will expect to be treated with dignity and respect whilst at work, and have an equal responsibility to treat their colleagues similarly. The company is committed to creating a harmonious working environment which is free from harassment, including discrimination, victimisation and bullying (which includes banter where it can be perceived as bullying), and which protects the dignity of female and male employees irrespective of their race, religion or belief, colour, age, national origin, disability or sexual orientation. Harassment is offensive and prejudicial to a productive working environment. It is indicative of a lack of respect for the person harassed, undermines his or her position and may have a negative impact upon health, job performance and sense of personal security.

Grievances

Any employee who feels they have not been treated in accordance with this policy will make a complaint using the Group's Grievance Procedure. All complaints will be dealt with seriously, promptly and confidentially. If a staff member is found to have breached the Policy they may be subject to disciplinary action under the Group's Disciplinary Procedure, which could result in dismissal.

Declaration

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, Mr. Moore has been appointed with the responsibility and authority to oversee and drive compliance. The Group, the Group CEO, Managing Directors, Directors and Managers are committed to continual improvement and this Policy will be reviewed annually and the Policy will be disseminated throughout the Group and supply chain as required.

For and on behalf of the TRAD Group

Signed: Hard copy signed in office
Des Moore, TRAD Group CEO

Dated: as front page

Signed: Hard copy signed in office
John Patterson, TRAD Hire & Sales, Managing Director

Dated: as front page

Signed: Hard copy signed in office
Jim Gorman, TRAD Safety Systems, Managing Director

Dated: as front page

Signed: Hard copy signed in office
Neil Garner, TRAD Scaffolding Contractors, Managing Director⁴

Dated: as front page

⁴ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.