

## SBUKZ EQUALITY POLICY STATEMENT

Soletanche Bachy SA is a global specialist foundation contracting organization conducting activities through local subsidiaries organized into geographical zones. Bachy Soletanche Ltd., McDonnell Piling Ltd, Menard Ltd and Soil Engineering Geoservices Ltd. are subsidiaries operating within the Soletanche Bachy UK Zone (SBUKZ) of specialist geotechnical contractors carrying out ground investigation, foundation, and specialist geotechnical work for the construction industry.

The SBUKZ is committed to eliminating discrimination and encouraging diversity amongst the workforce. The SBUKZ's aims and objectives are to create a working environment in which there is no unlawful discrimination, and all decisions are based on merit and for all of employees to be happy and engaged.

### Status of this policy

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

### Eligibility

This policy applies to all employees, temporary employees, and job applicants ("Employees").

### What is discrimination?

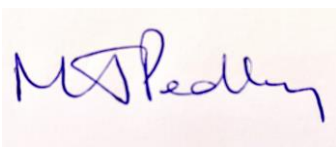
Discrimination is unlawful when it takes place on one of the following grounds (the 'protected characteristics'):

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

Discrimination can take several 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.

Approved by: Martin Pedley



(UK Zone Director)

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Please check the company intranet site to ensure that the latest version is held.*

- 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.

### **The SBUKZ approach to employees**

All employees have a duty not to discriminate against each other and not to help anyone else do so. The SBUKZ will not tolerate discrimination in its workforce.

### **Recruitment and selection**

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

The SBUKZ 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. The SBUKZ will not unlawfully discriminate against any employee in making promotion or training decisions. The SBUKZ believe all employees should have an equal opportunity to progress and develop.

The SBUKZ 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**

The SBUKZ aim to ensure that its terms of employment, benefits, facilities, and policies are free from unlawful discrimination. The SBUKZ will review 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 Human Resources manager, 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.

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

### **Disabled Employees**

The SBUKZ will make adjustments to accommodate disabled Employees where possible and reasonable. For example, the SBUKZ may be able to provide extra equipment or support, or re-arrange duties, and can make changes to its premises in appropriate cases. If you think you may have a disability, you are encouraged to tell the business about this so that appropriate solutions can be explored.

### **Gender Management**

The SBUKZ are committed to improving gender balance at all levels of the organisation aiming to become a better gender balanced employer. To support this, the SBUKZ will focus on how it and the wider industry can attract more women into employment.

To help do this the SBUKZ will:

- Strengthen 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.
- Facilitate better progression routes into senior roles for existing employees to enable all employees to reach their full potential.

- Improve ways of working to embed a healthy work-life balance for everyone. The SBUKZ has robust flexible working and shared parental leave policies, and offers flexible solutions to fit with personal circumstances, including job shares, part time contracts and flexible hours.
- Select a pool of diverse candidates for development programs with the aim of enhancing the potential for diverse pools of candidates for senior positions.
- Continue to conduct regular audits of pay and benefits to ensure that the pay structure remains gender neutral, market competitive and focused on roles.

### **Training on equality**

The SBUKZ will train managers and those responsible for recruitment and all Employees on understanding and avoiding discrimination. The SBUKZ will continue the '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.

### **Relationships with visitors, customers, and suppliers**

Discrimination against any visitors, customers or suppliers will not be tolerated. Equally, the SBUKZ expects visitors, customers, and suppliers not to discriminate against others and the SBUKZ 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 the Grievance procedure.

Allegations of potential breaches of this policy will be treated seriously. Employees 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 the disciplinary procedure.

### **What will happen if you act in a discriminatory way?**

If, after investigation, the SBUKZ 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.

### **SBUKZ's position on bullying and harassment**

All Employees have a duty not to bully or harass each other nor to help anyone else to do so.

The SBUKZ will not tolerate bullying or harassment in the 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 the SBUKZ 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.

The SBUKZ will take appropriate action if any Employee is bullied or harassed by our customers or suppliers.

If, after investigation, the SBUKZ decide that you have harassed or bullied another Employee, 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 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 the 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. The SBUKZ will then decide how best to deal with the situation, in consultation with you.

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

This policy, which is reviewed annually, is communicated to all employees and persons working on our behalf, is displayed at all our offices and sites, and is made publicly available to interested parties via our websites.