

The Martin Group of Companies

Incorporating:

H W Martin Holdings Limited

H W Martin Fencing and Forestry Limited

H W Martin (Traffic Management) Limited

H W Martin Safety Fencing Limited

H W Martin Fleet Maintenance Limited

H W Martin Waste Limited

Amber Langis

Premier Waste Recycling Limited

Lochrin Bain Limited

King Vehicle Engineering Limited

King Trailers Limited

King Transport Equipment Limited



King Highway Products Limited










Safety Vehicle Hire and Lease Limited

Virtus Traffic Management Solutions Limited

Group Equality, Diversity, and Inclusion Policy

Document History

Written by	Sarah Robson	
Authorised by	Gavin Peace	

Review Date	Reviewed By	Comments / Amendments	Version
25 June 2025	Sarah Robson 	Interim review further to C-Suite / SLT changes. Reviewer and authorisation change.	1.8
30 April 2025	Gavin Peace 	Annual review. Section added on third party harassment.	1.7
01 August 2024	Gavin Peace 	Interim review to reflect name change to HW Martin Fleet Maintenance Ltd, formerly HW Martin Plant Ltd	1.6
30 April 2024	Gavin Peace 	Annual review. Policy name change from Equal Opportunities Policy. Sections added – commitments, responsibilities, legislation, and advice on how to raise a concern.	1.5
26 February 2024	Gavin Peace 	Interim review to reflect authorization name change.	1.4
30 April 2023	Gavin Peace 	Annual Review. Virtus Traffic Management Solutions Limited added. Minor amendment to people with disabilities.	1.3
30 April 2022	Iain Kay 	Annual review. No changes.	1.2
30 April 2021	Iain Kay 	Annual review. Minor amendments. New logo added.	1.1
30 April 2020	Iain Kay 	Annual review and change to document reference in line with MSV 03-1-3 Procedure for Documented Information	1.0

The Martin Group (“the Company”) is committed to equality of opportunity and to a pro-active and inclusive approach to equality that supports and encourages all under-represented groups, promotes an inclusive culture and values diversity.

Subject to statutory provisions, no applicant for admission as an employee or for a staff appointment will be treated less favourably than another on the grounds of sex (including gender reassignment), marital or parental status, race, ethnic or national origin, colour, disability, sexual orientation, religion or age.

For prospective employees, entry into employment with the Company and progression within employment will be determined only by personal merit and by the application of criteria which are related to the duties and conditions of each particular post and the needs of the Company concerned.

If any person appointed as an employee considers that they are suffering from unequal treatment on any of the above grounds, they may make a complaint, which will be dealt with through the agreed procedures for grievances or the procedures for dealing with bullying and harassment, as appropriate.

The Company will take active steps to promote good practice. In particular it will:

- Promote equality of opportunity
- Promote good relations between people of different racial groups, between all genders and between disabled and non-disabled people.
- Have due regard to the need to eliminate discrimination on grounds of race, sex, disability, and all other grounds set out in the statement on equal opportunities.
- Subject its policies to continuous assessment in order to examine how they affect all under-represented groups, especially black, Asian and minority ethnic (BAME), women and disabled, and to identify whether its policies help to achieve equality of opportunity for all these groups, or whether they have an adverse impact.
- Monitor the recruitment and progress of all employees, paying particular attention to the recruitment and progress of BAME staff, women, and people with disabilities.
- Promote an inclusive culture and good management practice, through the development of codes of best practice, policies, and training.
- Take positive action wherever possible to support this policy and its aims.
- Publish this policy widely amongst staff, together with policy assessments and results of monitoring.

The Company will meet all statutory obligations under relevant legislation and, where appropriate, anticipate future legal requirements. The Company’s policy is guided by:

- The Human Rights Act 1998
- The Equality Act 2010

This policy will be communicated to all employees as part of their new starter pack and during induction. It will be reviewed at least annually and updated as required to reflect any changes in relevant legislation. It will be emailed to all employees each year following the annual update.

Failure to comply with this Policy could result in disciplinary action, which may include dismissal. The policy will be amended as appropriate to meet the demands of future legislation. Implementation of this policy will be the responsibility of the Directors. It will be reviewed every 12 months.

Policy Aims:

- Ensure that the Company has access to the widest labour market and secures the best employees for its needs.
- Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, they are given the help they need to attain their full potential to the benefit of the Company and themselves.
- Achieve an ability-based workforce, which is in line with the working population mix in the relevant labour market areas.

Recruitment and Selection:

- Open Recruitment methods such as job centers, careers offices, the Company website and press advertisements shall be used.
- Selection criteria will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.
- Wherever possible, more than one person must be involved in the selection interview and recruitment process.
- The Company will promote itself as an employer people are proud to work for and seek to achieve a balanced workforce which reflects the local labour market.
- Reasons for selection and rejection of applicants for vacancies will be recorded.

Training and Reward:

- Underrepresented groups will be encouraged to apply for training and employment opportunities with the Company. However, actual recruitment to all jobs will be strictly on merit.
- Wherever possible, efforts will be made to identify and remove unnecessary/unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged and/or underrepresented groups.
- Reward will be based on objective data, benchmarked internally and externally to ensure fair remuneration for all employees.

Gender Equality

The Company is opposed to all forms of discrimination based on sex or gender and will respect the right to dignity of all genders. It will continue to strive to achieve equality of opportunity, while attempting to recognise and address historical and gender specific discrimination.

The Company will:

- Recognise family and caring responsibilities through the continued development of family friendly and carer support policies and provisions.
- Recognise that career patterns are often disrupted because of caring responsibilities and provide appropriate training and career development opportunities.
- Challenge sexist attitudes and practices.
- Give full and fair consideration to applications for employment from women, based solely on their ability to do the job and give equal opportunity for training, career development and promotion for employees.

- Develop specific initiatives, where required, to address gender imbalances in the workforce in an attempt to bring about a representative workforce.
- Ensure that information, publicity, and advertising over which the Company has control or influence is non-sexist and uses positive images and language.

Race Equality

The Company recognises that people from ethnic minority groups face discrimination. The Company is committed to challenging all forms of racism and to employment provision that complies with the Equal Opportunities Policy.

The Company will continue to work towards the elimination of discrimination on grounds of colour, national origin, race, and religion.

Racial harassment can take many forms, from relatively minor abuse to actual physical violence. Examples of harassment include:

- Insensitive jokes related to race, colour, or nationality.
- Remarks or banter that have a racial content or are racist in nature.
- Pranks perpetrated on racial grounds.
- Deliberate exclusion from conversations on racial grounds

The Company will:

- Give full and fair consideration to applicants from ethnic minority groups, based solely on their ability to do the job and give equal opportunity for training, career development and promotion for employees.
- Strive to make services flexible and responsive to the needs of service users.
- Monitor the effectiveness of its services and policies by appropriate means.

Age Equality

Ageism is discrimination based on preconceived ideas of an individual's capabilities at certain stages in their lives and is often targeted at younger or older people. The Company is opposed to discrimination on the grounds of age.

The Company will:

- Ensure that age is not a barrier to recruitment, selection, promotion, reward, training or personal development.
- Ensure that age will not be considered adversely where redundancy and retirement may apply.
- Seek to eliminate age discrimination through training.

Sexuality

The Company is opposed to all forms of discrimination on the ground of sexual orientation, preference or identity. It recognises that decisions and practices relating to employment and service delivery should not be based on the assumption that everyone is, or should be, heterosexual.

The Company's Policy is to protect the rights of individuals, regardless of their sexuality and will work for the eradication of all forms of discrimination on these grounds through training, awareness raising and implementation of anti-harassment procedures.

The Company will:

- Respect an individual's right to define their sexual identity.
- Protect the dignity of women and men at work.
- Work towards enabling employees to feel safe in being open about their sexual identity.
- Ensure that appropriate awareness training is provided in existing training courses and where necessary, make additional provision for such training.

Disability

The Company will:

- Promote disabled people in a positive light and take a lead in countering negative stereotypes.
- Ensure that any disabled person applying for a vacancy will be judged solely on their ability to do the job.
- Modify equipment and/or provide aids/or support where necessary to enable a disabled person to do a job.
- Adapt premises where possible.
- Use all possible means to retain newly disabled employees and employees with progressive impairments.
- Seek to eliminate discrimination through training.

Harassment

The Company recognises that harassment, discrimination, victimisation or bullying of any nature is unacceptable. A culture is promoted where employees can bring a complaint without fear of ridicule or reprisal.

Direct Discrimination is when people are treated less favourably because of the group to which they belong. "I never employ women; they always leave to have babies" is an example of direct discrimination.

Indirect Discrimination occurs when conditions are set which make it more difficult for some groups to comply than others. This is the more common form of discrimination. Examples include a requirement about clothing which disproportionately disadvantages a racial group or setting a qualification level which a disabled person might not be able to meet if these requirements cannot be justified on other grounds.

Specific procedures are in place to enable an individual to pursue a complaint and for appropriate action to be taken. The aim is to prevent harassment occurring and to enable individuals to confront unacceptable action or behaviour. Employees have an obligation to promote an atmosphere free from harassment and to challenge instances of harassment.

The Company will:

- Ensure that employees are aware of harassment procedures.
- Ensure that complaints are dealt with in a sensitive manner.
- Monitor complaints.

Examples of Harassment

Harassment may take many forms, from relatively mild sexual banter to actual physical violence. Employees may not always realise that their behaviour constitutes harassment, but they must recognise that what is acceptable to one person may not be acceptable to another. Regardless of intent, sexual or any other form of harassment is unwanted behaviour by one employee towards another.

Examples of sexual harassment include:

- Insensitive jokes and pranks that contain a sexual element.
- Remarks or banter that have a sexual content.
- Lewd comments about appearance.
- Unnecessary body contact.
- Displays of sexually offensive material, e.g. pin ups, emails with offensive attachments.
- Requests for sexual favours.
- Speculation about a person's private life and sexual activities.
- Threatened or actual sexual violence.
- Threat of dismissal, loss of promotion, etc for refusal of sexual favours.
- Emails of a sexual nature.

Harassment relating to religion or belief could take many forms including:

- Insensitive jokes or pranks linked to religion or belief or to absence of religion or belief.
- Remarks or banter about religious beliefs or practices.
- Abusive, threatening, or insulting words or behaviour on the grounds of religion or belief or absence of religion or belief.
- Displaying writing or pictures that are abusive towards a particular religion.
- Emails making unnecessary reference to a person's religion or belief.

Behaviour

Each individual is responsible for creating and maintaining a workplace free from unfair discrimination. The Company will foster a culture where behaviour is positive, judging people on their own merits rather than acting on the basis of assumptions. The Company always will support employees to work together to develop the different skills and abilities and values diversity.

Commitments

The Company is committed to:

- Ensuring that our employees are treated in a manner that is fair and inclusive.
- Ensuring that any equality impact assessments are undertaken for all new policies and changes to workforce conditions and structures.
- Ensuring that anyone applying for employment is treated fairly and without discrimination and that no applicant will be placed at a disadvantage by requirements or conditions which are not necessary for the post.

- Ensuring that the equal opportunities strapline is present in all job advertisements.
- Ensuring equality of access and opportunity in relation to staff development and career advancement opportunities across the Company.
- Providing a working environment free from harassment and intimidation and by dealing promptly and effectively with all forms of harassment against employees through the Company Grievance Policy.
- Providing guidance or coaching or training as required for employees, including managers, on equality, diversity, and inclusion.
- Communicating a clear message to all, that racist, sexist, homophobic, ageist, disablist or any other behaviour deemed to constitute any breach of this policy, including harassment, will not be tolerated.
- Eliminating discrimination based on age, ethnicity, religion or belief, gender, gender reassignment, gender identity, disability, marital or civil partnership status.

Responsibilities

- The Human Resources Department has overall responsibility for the Group Equality, Diversity, and Inclusion Policy.
- Line managers should make clear to employees the implications of the potential breaching of the Group Equality, Diversity and Inclusion Policy and associate employment legislation. They are expected to promote equality of opportunity, diversity and inclusion and assist with eliminating discrimination in the workplace.
- Line managers are required to ensure employees in their teams attend any required training or briefings on equality, diversity and inclusion.
- Line Managers are also required to undertake this training themselves as required and familiarise themselves with this policy.
- All employees, and other people carrying out work or delivering services on behalf of the Company agree to adhere to this policy and to promote a culture that is free from unlawful discrimination and all forms of harassment. Employees are encouraged to inform management if any discrimination is taking place.
- All employees should ensure they remain compliant with any guidance, training, or briefings they receive on equality, diversity and inclusion.

Equality and Diversity Legislation

- Employees, contractors, consultants, and agencies working for the Company, will be expected to work in accordance with the principles of equal opportunities and diversity and properly discharge their responsibilities in accordance with:
 - The Equal Pay Act (as amended) 1970
 - The Rehabilitation of Offenders Act 1974
 - The Human Rights Act 1998
 - Part Time Workers Regulations 2000
 - Fixed Employees Regulations 2002
 - The Civil Partnership Act 2004
 - Marriage (Same-Sex Couples) Act 2013
 - The Equality Act 2010

Raising a concern

If an employee has a concern or complaint about discrimination, or any type of harassment, which could be something that they have experienced or witnessed, they should raise this with their line manager in the first instance unless the matter relates to their manager in which case the next level of management or HR should be approached. If the person raising the concern is not satisfied that the matter has been dealt with then the Company Grievance Policy should be followed.

Third-party harassment

Third-party harassment occurs when anyone within our workforce is subjected to harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes, but not limited to, our customers, suppliers, contractors, and members of the public. Third-party harassment of our workforce will not be tolerated. It is unwanted behaviour from third parties that humiliates, victimizes or threatens any of our staff, for example:

- Verbal and physical abuse
- Racial slurs
- Sexual advances
- Violence or threat of violence
- Facial expressions or mimicry
- Discrimination
- Bullying
- Harassment
- Imagery or graffiti
- Jokes or banter
- Acts affecting a person's surroundings
- Physical behaviour towards a person or their property

Abuse or harassment can take place online, face to face or over the phone. This list is not exhaustive. Abuse or harassment by a third party can be just as devastating for a worker as incident/s perpetrated by a colleague.

Circumstances where harassment can occur

Behaviour by third parties towards a member of our workforce which occurs in the following situations:

1. a work situation.
2. a situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch or a social event with colleagues.
3. outside of a work situation but against a colleague or other person connected to the Organisation, including on social media.

Action to prevent third-party harassment

We take a zero-tolerance approach to third-party harassment of our workforce. Any complaints of third-party harassment will be taken seriously and thoroughly investigated. Should a customer

harass a member of our workforce, they will be warned that continued provision of their service to us, or of us to them, will cease if they are to act in a similar way again. Should the behaviour recur, they will be informed that their service to us, or of us to them, will cease. Any criminal acts will be reported to the police, and we will share information relating to the incident within the Company to ensure that we maintain a consistent approach to the cessation of our services. Should an employee experience any form of harassment from a third – part then they should raise with their line manager or HR.



Gavin Peace
Group Director of Human Resources