

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

FEWZED Limited

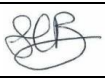
Site Track Limited

ALBA Traffic Management Limited

Group Equality, Diversity, and Inclusion Policy

Document History

Written by	Sarah Robson	
Authorised by	Gavin Peace	

Review Date	Reviewed By		Comments / Amendments	Version
16 September 2026	Sarah Robson		Interim review to add ALBA Traffic Management as a Martin Group company.	2.2
25 June 2026	Sarah Robson		Document review specifics reworded	2.1
01 April 2026	Sarah Robson		Re-write to refresh and comply with the Employments Rights Act 2025 and implementation.	2.0
29 September 2025	Aidan Lack		Addition into the companies incorporated within the Martin Group of Companies.	1.9
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

The Martin Group (“the Company”) is committed to encouraging equality, diversity, and inclusion among our workforce and eliminating unlawful discrimination. Our aim is for our workforce to be truly representative of all sections of society and for every worker to feel respected and able to give their best.

Policy Aim

The primary aim of this Policy is to cultivate a workplace culture where equality, diversity, and inclusion are not only legal obligations but fundamental drivers of our organisational excellence. We are committed to providing equality, fairness, and respect for all employees whether temporary, part-time, or full-time and to eliminating unlawful discrimination across all protected characteristics. In strict compliance with the Employment Rights Act 2025, this policy aims to proactively address systemic barriers by instituting for paternity leave, unpaid parental leave, and statutory sick pay, ensuring that essential protections are accessible to all from their first day of service. Furthermore, we commit to taking all reasonable steps to protect our workforce from sexual harassment and harassment by third parties, while fostering a transparent environment where reporting concerns is encouraged through strengthened whistleblowing protections. By embedding these standards, we aim to ensure our workforce is truly representative of society, where every individual feels safe, valued, and empowered to achieve their full potential.

Scope and Protected Characteristics

This policy applies to all employees, workers, agency workers, and job applicants. We will not unlawfully discriminate because of the protected characteristics as defined by the Equality Act 2010:

Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex, and sexual orientation.

Scope of Workplace Conduct

The Company’s zero-tolerance approach to harassment and discrimination is not limited to our physical office premises, or sites we operate at, or standard working hours. This policy applies to all conduct occurring in the course of employment, which includes but is not limited to:

- Work-related travel, off-site meetings, and client visits.
- Social events organised by the company or involving colleagues, such as, but are not limited to presentation evenings or team-building activities.
- Online and digital environments, including company email, messaging platforms (e.g., Teams), and work-related social media interactions.
- Any situation where an individual is representing the company or where their conduct has a direct impact on the working environment or the company's reputation.

Harassment

The Company is committed to fostering a workplace culture entirely free from harassment, discrimination, victimisation, and bullying. We maintain a zero-tolerance approach to such

behaviours and guarantee an environment where all employees can raise complaints without fear of ridicule or reprisal.

Types of Unlawful Conduct

In accordance with the Equality Act 2010, we define several forms of prohibited conduct:

Direct Discrimination occurs when an individual is treated less favourably because of a protected characteristic (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) An example is refusing employment to a woman based on assumptions about potential maternity leave.

Indirect Discrimination occurs when a provision, criterion, or practice is applied equally to all staff but puts individuals with a particular protected characteristic at a disproportionate disadvantage, and that practice cannot be objectively justified by a legitimate business need. Examples include setting an unjustified height requirement that disadvantages women or specific dress codes that clash with religious requirements.

Responsibilities and Reporting

Managers must lead by example, address concerns immediately, and ensure the policy is understood and applied consistently. Failure to address reported harassment may be treated as a disciplinary matter.

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 but are not limited to:

- Insensitive jokes and pranks that contain sexual elements.
- Remarks or banter that have 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 favour.
- Speculation about a person's private life and sexual activities.
- Threatening or actual sexual violence.
- Threat of dismissal, loss of promotion, etc. for refusal of sexual favour.
- Emails of a sexual nature.

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

Verbal & Non-Verbal Examples

- Offensive Jokes & Slurs: Using racial, sexist, or homophobic language, even if intended as a "joke".
- Insults & Belittling: Name-calling, put-downs, condescending remarks, or mocking someone's appearance.

- Threats & Intimidation: Yelling, making menacing gestures, threatening physical harm, or excessive micromanagement.
- Gossip & Rumors: Spreading malicious rumors or starting false stories about colleagues.

Physical & Visual Examples

- Unwanted Touching: Hugging, patting, or any non-consensual physical contact.
- Offensive Imagery: Displaying pornography, offensive cartoons, or sending inappropriate images/texts.
- Stalking & Intrusive Behavior: Following someone, unwanted calls/messages, or intimidating staring.
- Discriminatory & Bullying Examples
- Exclusion & Undermining: Ignoring someone, leaving them out of meetings/social events, or deliberately undermining their work.
- Unfair Treatment: Denying training, promotions, or assigning unreasonable workloads based on protected characteristics.
- Harassment Related to Identity: Making inappropriate comments about someone's religion, disability, gender identity (e.g., misgendering), or ethnicity

Digital Harassment (Cyberbullying)

- Online Abuse: Sending offensive messages or posting derogatory comments about a colleague online.

Behaviour

Everyone 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 based on assumptions. The Company always will support employees to work together to develop different skills and abilities and values diversity.

Enhanced Prevention of Harassment

In accordance with the Employment Rights Act 2025, we maintain a zero-tolerance approach to all forms of harassment.

Effective October 2026, we have a statutory duty to take all reasonable steps to prevent sexual harassment in the workplace. This includes training, risk assessments, and clear reporting channels.

We are liable for harassment of our staff by third parties (e.g., customers, clients, or contractors). We will take all reasonable steps to prevent such conduct and will support any worker who experiences it.

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 is 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, victimises 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.

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, as a first step (and dependent on the severity of the allegation) they may 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 – party then they should raise with their line manager or HR.

Disclosures concerning sexual harassment are recognised as protected disclosures (effective April 2026). No worker will suffer detriment for reporting such concerns if made in good faith.

Any provision in a contract or settlement agreement (NDA) that seeks to prevent a worker from disclosing information about harassment or discrimination is void and unenforceable.

Family-Friendly and Sick Pay Rights

We recognise and support the following the "Day One" rights (effective April 2026) that eligibility for paternity leave, unpaid parental leave and statutory sick pay begins from the first day of employment.

We will recognise and support further rights when as are implemented in accordance with government guidance, such as, Bereavement Leave and Maternity Protection etc. We will update our policies accordingly in line with updates to legislation. To ensure this policy remains impactful, the company will conduct periodic reviews of the effectiveness of the policy.

Recruitment and Promotion

Selection for employment, promotion, and training will be based on merit and ability.

We will ensure that recruitment processes are accessible and that candidates are not discouraged by any part of the process.

Responsibilities

All workers have a responsibility to treat others with dignity and respect and to challenge or report any discriminatory behavior.

Line Managers must ensure this policy is implemented in their areas and that all reports of discrimination or harassment are handled promptly and seriously.

- 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 breach 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.

Complaints and Breaches

Anyone who believes they have been subject to discrimination or harassment should use our Grievance Procedure or Whistleblowing Policy. The Company has a 'zero policy' to breaches of this policy and will be treated as misconduct and may lead to disciplinary action, up to and including dismissal.



Gavin Peace
Group Director of Human Resources