



EQUALITY, DIVERSITY AND INCLUSION POLICY

A practical policy for fair treatment, respectful behaviour and inclusive site culture across Veraxus Ltd operations.

Company	Status	Effective date	Next review
Veraxus Ltd	Approved	08 May 2026	08 May 2027, or earlier if required
Document owner	Policy area	Approved by	Controlled use
Alex Stefan, Director	Equality, diversity and inclusion	Director	Client assurance, tender submissions, website and internal governance

POLICY AT A GLANCE

Fair treatment - Decisions, opportunities and working relationships are managed without discrimination and with regard to the Equality Act framework.	Respectful conduct - Everyone working for or with Veraxus Ltd is expected to communicate professionally and treat others with dignity.
Inclusive working - Management, site leads and subcontractors are expected to support a positive environment where concerns can be raised early.	Practical accountability - Issues are handled promptly, sensitively and proportionately, with records, learning and improvements where required.

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Controlled copy note:

This document may be issued as a controlled PDF for client assurance, tender submissions, website download, internal governance and professional stakeholder review. Where a later signed copy is issued, the later signed copy takes precedence.

Document use

This policy is intended to support responsible working culture, fair treatment, communication standards, subcontractor expectations and tender/PQQ evidence. It should be read alongside project-specific contracts, HR procedures, disciplinary/grievance arrangements and client site rules where applicable.



1. INTRODUCTION AND POLICY STATEMENT

1.1 Company commitment: Veraxus Ltd is committed to equality, diversity and inclusion in all aspects of its business. Every individual has the right to be treated with dignity, respect and fairness, whether they are an employee, operative, subcontractor, supplier, client representative, site visitor, resident or other stakeholder involved in company activity.

1.2 Operational culture: As a construction, refurbishment and management-led delivery business, Veraxus Ltd recognises that professional behaviour is part of quality control. Respectful communication, early resolution of issues and fair working practices support safer sites, better coordination and stronger client confidence.

1.3 Practical standard: The company expects people working for or on behalf of Veraxus Ltd to behave in a way that is calm, respectful, inclusive and professionally accountable. This policy is designed to be practical for a growing contractor and suitable for client, tender and internal governance use.

2. PURPOSE, SCOPE AND APPLICATION

The purpose of this policy is to set a clear framework for embedding equality, diversity and inclusion principles into ordinary business decisions, site conduct, subcontractor engagement and management practices.

Fair working environment: create and maintain working conditions where people can contribute without discrimination, bullying, harassment or victimisation.

Clear behavioural expectations: explain the standards expected from directors, management, site leads, employees, operatives, subcontractors and others working on behalf of the company.

Early issue resolution: encourage concerns to be raised, assessed and handled promptly, fairly and sensitively.

Tender and client assurance: demonstrate that Veraxus Ltd treats people, site culture and professional conduct as part of controlled project delivery.

Application area	Policy position
Who is covered	Directors, employees, workers, temporary personnel, operatives, subcontractors, consultants, suppliers and anyone working on behalf of Veraxus Ltd where relevant.
Where it applies	Company workplaces, construction sites, client premises, offices, vehicles, remote communication, project meetings, tender activity and work-related events or communications.
Practical limits	This policy supports good governance but does not replace employment contracts, disciplinary procedures, grievance procedures, site rules, professional legal advice or client-specific requirements.

Plain language summary

Veraxus Ltd expects fair treatment, respectful conduct and practical accountability. People should be able to work, raise issues and contribute without being subjected to discrimination, bullying, harassment or exclusionary behaviour.

3. LEGAL AND GUIDANCE ALIGNMENT

This policy is aligned with UK equality and employment principles, including the Equality Act 2010, the duty to consider reasonable adjustments for disabled workers, and current workplace guidance on discrimination, bullying, harassment and inclusive practice.

Equality Act 2010: the policy reflects the core principle that people must not be discriminated against because of a protected characteristic.

Reasonable adjustments: the policy supports consideration of adjustments where a disabled person or worker with a relevant health condition may otherwise be placed at a substantial disadvantage.

Preventative duty: the policy recognises the employer duty to take reasonable steps to prevent sexual harassment, including risks involving third parties in work-related settings.

Guidance-led practice: the policy uses practical guidance from GOV.UK, the Equality and Human Rights Commission and Acas as a reference basis rather than as an academic citation document.

Reference basis

Prepared with reference to GOV.UK Equality Act and discrimination guidance; Equality and Human Rights Commission guidance on protected characteristics and harassment at work; and Acas guidance on equality, diversity and inclusion, discrimination and bullying, sexual harassment prevention and reasonable adjustments. References checked 08 May 2026.

4. PROTECTED CHARACTERISTICS AND FAIR TREATMENT

The Equality Act framework protects people from discrimination connected with specific protected characteristics. Veraxus Ltd expects decisions and behaviour to be based on role requirements, competence, conduct, safety, project needs and legitimate business considerations - not assumptions or prejudice.

Protected characteristics under the Equality Act framework		
Age	Disability	Gender reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief	Sex	Sexual orientation

Fair treatment control

Managers and site leads should challenge assumptions early. A decision that appears neutral can still create unfair disadvantage if it is not necessary, proportionate or properly connected to the role, project or safety requirement.

5. CORE COMMITMENTS

Commitment	How it is applied by Veraxus Ltd
Equal opportunity	Provide fair access to work opportunities, development, resources and engagement routes, based on relevant skills, role requirements and business need.
Respect and dignity	Treat colleagues, subcontractors, clients, suppliers, residents and site visitors with courtesy and professional consideration.
Inclusion	Create a working environment where people can ask questions, raise concerns, contribute ideas and participate without being undermined or excluded.
Professional communication	Use clear, constructive and respectful language in meetings, emails, messages, site instructions and day-to-day communication.
Accountability	Address poor behaviour promptly and fairly. Do not ignore conduct that damages site confidence, safety, wellbeing or professional standards.
Improvement mindset	Review feedback, concerns, near misses and operational experience to improve culture, training and policy implementation.
Management discipline A positive culture is not created by wording alone. It is reinforced by consistent management behaviour, clear expectations, proportionate action and willingness to learn from concerns or mistakes.	

6. RECRUITMENT, ENGAGEMENT AND FAIR WORKING PRACTICES

Veraxus Ltd aims to make recruitment, subcontractor engagement and working arrangements fair, transparent and relevant to the work being undertaken. The company will avoid unnecessary barriers and will apply role-related criteria wherever people are selected, engaged, allocated or assessed.

Area	Control standard
Role and package descriptions	Use clear, inclusive and role-relevant wording. Avoid language that could unnecessarily discourage suitable applicants or subcontractors.
Selection and engagement	Assess people against competence, experience, availability, reliability, safety awareness, insurance/compliance requirements and project suitability.
Terms and opportunity	Apply terms, rates, resources, work allocation and development opportunities fairly, consistently and with proper business reasoning.
Monitoring and improvement	As the company grows, review recruitment, subcontractor engagement and site allocation practices to identify avoidable barriers or repeated issues.
Reasonable adjustments	Consider reasonable adjustments for disabled applicants, workers or subcontractors where applicable and where adjustments can be made without compromising safety or essential role requirements.
Practical recruitment note For a growing business, fairness does not mean over-promising resources or operating a corporate HR process that does not exist. It means making decisions clearly, consistently, lawfully and on a proper role-related basis.	

7. DIGNITY AT WORK, BULLYING AND HARASSMENT

Veraxus Ltd will not tolerate bullying, harassment, victimisation or discrimination. Concerns will be assessed in context and handled fairly, but the company expects clear professional standards at all times.

Conduct area	Policy control standard
Examples of unacceptable behaviour	Bullying, intimidation, repeated hostile conduct, offensive jokes, slurs, humiliation, abusive language, discriminatory assumptions, exclusionary behaviour, deliberate undermining, victimisation, unwanted sexual conduct or any behaviour that damages dignity, confidence or site professionalism.
Expected response	Address issues through clear instructions, evidence, respectful correction and proportionate management action. Challenge inappropriate comments promptly, protect people from retaliation, maintain confidentiality and keep communication calm and controlled.
Behaviour standard The test is not whether someone intended to offend. Managers should consider the effect of the behaviour, the context, any protected characteristic involved, the pattern of conduct and the action needed to prevent recurrence.	

8. SEXUAL HARASSMENT PREVENTION AND THIRD-PARTY CONDUCT

Veraxus Ltd recognises the preventative duty to take reasonable steps to prevent sexual harassment of workers. This is treated as an active management responsibility, not simply a complaint response after an incident has occurred.

Risk awareness: consider where harassment risk may arise, including isolated working, out-of-hours access, client sites, public-facing areas, travel, messaging platforms and work-related events.

Clear standards: sexual comments, unwanted attention, sexual jokes, intrusive questions, explicit material, coercive behaviour and retaliation are unacceptable.

Third parties: where clients, suppliers, residents, visitors or other contractors are involved, concerns should still be raised and managed through appropriate site, client or management routes.



Prompt action: if an incident or concern is raised, take steps to stop the behaviour, support the affected person, investigate fairly and reduce the chance of recurrence.

Proportionate records: keep a confidential record of the concern, action taken, decisions made and any improvement identified.

Preventative duty note

The company should not wait for a serious incident before acting. Reasonable steps may include clear communication, site induction messaging, management oversight, reporting routes, supplier expectations and review of work situations where risk could arise.

9. REASONABLE ADJUSTMENTS AND ACCESSIBILITY

Veraxus Ltd will consider reasonable adjustments where a disabled person, applicant or worker may be placed at a substantial disadvantage. Adjustments must be assessed practically, sensitively and in the context of the role, site safety, operational requirements and the needs of the individual.

Adjustment area	Examples of practical consideration
Communication	Providing instructions in writing, allowing extra time for reading or discussion, using clearer formatting, or agreeing a suitable point of contact.
Work arrangements	Considering adjusted start times, task allocation, phased return, modified duties or additional supervision where reasonable and safe.
Equipment and access	Considering tools, PPE, access arrangements, welfare access, workstation set-up or physical adjustments where feasible.
Recruitment and onboarding	Adjusting interview arrangements, induction format or evidence submission requirements where appropriate.
Review and record	Record agreed adjustments, review whether they remain suitable and avoid sharing unnecessary health information.

Safety and equality balance

Reasonable adjustments should support inclusion while maintaining legal health and safety duties. If an adjustment affects safety-critical work, the company should consider alternative controls rather than dismissing the request without assessment.

10. SITE CULTURE, SUBCONTRACTORS AND SUPPLY CHAIN

Veraxus Ltd expects professional conduct from those working under its direction or representing the company. This is particularly important in live environments, occupied premises, client sites and multi-contractor projects where communication, trust and reputation are critical.

Site and supply chain area	Expected control
Site induction and briefing	Communicate behavioural expectations, reporting routes, welfare/access arrangements and professional conduct standards at the start of works where proportionate.
Client and resident interaction	Keep communication polite, calm and task-focused. Avoid inappropriate comments, intrusive questions or unapproved sharing of personal information.
Subcontractor expectations	Subcontractors are expected to comply with this policy when working for or representing Veraxus Ltd. Serious concerns may affect future engagement.
Workplace materials	Sites, vehicles, shared folders and communications must remain free from offensive, discriminatory or sexually inappropriate material.
Management example	Directors, supervisors and site leads must model the standard they expect from others and act where they see behaviour falling below it.

Construction-specific control

A respectful site culture supports safety, programme control and quality. Poor behaviour can lead to conflict, reduced cooperation, higher risk and damage to client confidence.

11. RAISING CONCERNS AND COMPLAINT HANDLING

Anyone working for or on behalf of Veraxus Ltd should feel able to raise a concern about discrimination, bullying, harassment, victimisation or disrespectful conduct. Concerns may be raised informally or formally depending on seriousness, preference and circumstances.

- 1. Raise or identify the concern:** concerns may be raised to a supervisor, site lead, manager or Director. In a smaller business, the Director may handle the issue directly or appoint a suitable person to support review.
- 2. Make immediate controls:** if there is an urgent risk, take proportionate steps to protect people, separate parties where needed, stop the conduct and preserve relevant evidence.
- 3. Review facts fairly:** listen to the person raising the concern, consider witnesses or records, avoid assumptions and give relevant people a fair opportunity to respond.
- 4. Decide action and outcome:** take appropriate action, which may include informal resolution, instruction, training, warning, removal from site, contract action or escalation under relevant procedures.
- 5. Record and improve:** keep a proportionate confidential record and identify whether toolbox talks, supplier controls, site briefings or policy changes are needed.

Non-victimisation commitment

Veraxus Ltd will not tolerate victimisation of a person because they raised a concern, supported someone else, gave evidence or acted in good faith in relation to equality, harassment or discrimination issues.

12. ROLES AND RESPONSIBILITIES

Equality, diversity and inclusion are shared responsibilities. Directors and management set the tone; supervisors and site leads apply standards day to day; workers and subcontractors contribute through respectful behaviour and early reporting of concerns.

Role	Responsibilities
Directors / Management	Approve and maintain the policy; lead by example; set expectations; provide proportionate resources; address concerns promptly and fairly; consider adjustments; review learning and improvements.
Supervisors / Site Leads	Communicate expectations on site; address poor conduct early; support reporting routes; protect people from retaliation; escalate serious concerns to management.
Employees / Operatives	Treat others with dignity and respect; follow policy standards; challenge or report unacceptable behaviour; participate in training or briefings where required.
Subcontractors / Suppliers	Comply with relevant policy requirements; ensure their personnel behave professionally; cooperate with site expectations, investigations and corrective actions.
Clients / Principal Contractors / Others	Where relevant, cooperate with reasonable site conduct expectations and raise any concerns through agreed communication routes.

Leadership note

The company's standard is judged by what management accepts in practice. If conduct is ignored, repeated or excused without proper review, the policy loses credibility. Consistency matters.

13. TRAINING, AWARENESS AND MONITORING

Veraxus Ltd will provide proportionate awareness and communication suitable for the size and risk profile of the business. The aim is to make expectations understood, not to create unnecessary administration.

Activity	Implementation approach
Induction and onboarding	Explain expected conduct, reporting routes and respectful communication standards to employees, operatives and relevant subcontractors.
Toolbox talks / briefings	Use short briefings where project risk, team changes, client requirements or previous concerns show that reinforcement is needed.
Management awareness	Ensure directors, supervisors and site leads understand how to respond to concerns, protect confidentiality and avoid retaliation.
Monitoring	Review concerns, near misses, feedback, client comments and subcontractor issues for patterns or improvement opportunities.
Policy refresh	Review this policy annually and earlier where legal guidance, operational experience, client requirements or business structure changes.

Proportionate assurance

Veraxus Ltd can evidence implementation through a written policy, issue records, subcontractor communication, induction notes, toolbox talks, management action and review of lessons learned.

14. RECORDS, CONFIDENTIALITY, REVIEW AND IMPROVEMENT

Equality-related concerns may involve sensitive personal information. Veraxus Ltd will handle records carefully, limit access, share information only where necessary and retain records in line with legal, contractual and operational requirements.

Confidentiality: information about complaints, health, disability, reasonable adjustments, harassment or disciplinary matters must be shared only with those who need to know.

Records: keep proportionate records of concerns, investigations, actions taken, decisions, adjustments and improvement measures without unnecessary personal detail.

Data protection link: equality-related information should be handled alongside the company's data protection and confidentiality controls.

Continuous improvement: use complaints, feedback, incidents, near misses and client requirements to improve practice, training, communication and supplier controls.

Annual review: review this policy annually and earlier where law, guidance, contracts, client requirements or operational risk materially change.

Review approach

The review is intended to keep the policy practical, honest and suitable for Veraxus Ltd's construction, refurbishment, tendering, subcontractor management and client-facing operations.

15. TENDER ASSURANCE WORDING

The following wording may be used in supplier questionnaires, PQQs, capability statements or tender submissions where a concise EDI policy statement is required.

Suggested tender wording

Veraxus Ltd maintains a written Equality, Diversity and Inclusion Policy covering fair treatment, respectful conduct, reasonable adjustments, harassment prevention, reporting routes and subcontractor expectations. Expectations are communicated proportionately and concerns are handled promptly, sensitively and fairly.

What Veraxus can say now	What should not be overstated
A written EDI policy is in place and approved for company governance, client assurance and tender use.	That every issue has already been solved or that the business has a large corporate HR function.
Expectations are communicated to relevant employees, operatives and subcontractors.	That a policy alone eliminates all behaviour risk. Implementation and management action remain essential.
Concerns can be raised through supervisors, site leads, management or the Director and will be handled fairly.	That all decisions are automatic or identical in every situation; context, safety and evidence still matter.
The company is committed to continuous improvement as the business grows.	That "zero tolerance" means no investigation, context or fair process. Serious issues are acted on, but fairly.

Credibility note

Tender credibility is built by being clear, professional and honest. Veraxus Ltd should present a strong standard without claiming systems, resources or historical data that do not yet exist.

Tender evidence item	How it supports the EDI answer
Signed policy PDF	Shows that Veraxus Ltd has adopted a controlled equality, diversity and inclusion standard for formal use.
Subcontractor communication	Shows that behavioural expectations can be issued to operatives and supply chain partners before or during works.
Induction or briefing notes	Shows practical communication of respectful conduct, reporting routes and site behaviour expectations.
Issue or complaint record	Shows that concerns can be logged, reviewed, actioned and used for improvement where required.
Annual review note	Shows that the policy can be checked against legal guidance, client requirements and operational experience.

Website and PQQ use note

A shorter website statement may summarise the company culture in plain language. For client portals, adviser reviews or formal PQQ/tender evidence, the signed policy PDF should be used as the controlled reference.

PQQ / client question	Controlled response approach
Do you have an EDI policy?	Answer yes and attach this signed policy PDF as the controlled evidence document.
How is it implemented?	Refer to proportionate communication, induction or briefing notes, subcontractor expectations and Director oversight.
How are concerns handled?	Refer to early reporting, fair review, confidentiality, non-victimisation and proportionate records.
How are subcontractors covered?	Refer to supply chain communication and the expectation that subcontractors comply when representing Veraxus Ltd.
How is improvement managed?	Refer to annual review, lessons learned, client feedback, site experience and legal or tender requirement changes.
Practical situation	How Veraxus Ltd should evidence control
Live site or occupied premises	Show that respectful communication, privacy, resident/client interaction and behaviour expectations are managed through site leadership.
Multi-contractor environment	Show that subcontractor conduct, third-party issues and escalation routes are addressed as part of project coordination.
Complaint or concern raised	Show that the concern was logged, reviewed fairly, handled sensitively and used for learning where appropriate.
Reasonable adjustment request	Show that the request was considered practically, with safety, role requirements and confidentiality taken into account.

Final tender control note

Where a client or portal asks for more detail than this policy contains, Veraxus Ltd should answer specifically and honestly rather than overstate resources, statistics or systems that are not yet in place.

Issue route	Document control action
Website summary	Use short people-first wording and link or offer the controlled policy PDF where formal evidence is needed.
Tender portal upload	Upload the full signed PDF, keeping the approval page, review date and controlled document notes together.
Client clarification	Answer the specific question, reference this policy, and offer additional project-specific controls only where they can be implemented.

16. DECLARATION AND ELECTRONIC APPROVAL

This policy is approved by Veraxus Ltd and applies across company operations. It is intended to support fair treatment, respectful working culture, client assurance, tender readiness, internal governance and professional standards.

Application area	Approval meaning
Company governance	The policy sets the expected standard for fair treatment, respectful behaviour, issue reporting and inclusive working practices within Veraxus Ltd.
Client and tender assurance	The policy may be issued to clients, advisers, contractors, portals and stakeholders as evidence of responsible EDI governance.
Operational use	Personnel should apply the policy when managing sites, subcontractors, client interaction, recruitment, complaints and project communication.
Future improvement	The policy will be reviewed as legal duties, tender requirements, business operations, personnel arrangements and site risks develop.

Approval statement:
Approved and signed electronically on behalf of Veraxus Ltd. This document has been electronically approved and signed by the Director of Veraxus Ltd. The typed signature below is intended to authenticate and approve this document on behalf of the company.

Approval item	Detail
Name	Alex Stefan
Position	Director
Signature	Alex Stefan
Date	08 May 2026
Document status	Approved
Next review	08 May 2027, or earlier if required
Approval control	Practical meaning
Authority	The policy is approved for use as a Veraxus Ltd company governance and client assurance document.
External issue	The document may be supplied to clients, advisers, contractors, portals and professional stakeholders where evidence of EDI governance is required.
Operational use	Directors, site leads, workers and subcontractors should use the policy as a standard for respectful conduct, raising concerns and fair treatment.
Review control	Any future update should be issued as a replacement controlled policy rather than informal amendment to the approval page.
Final control check	Expected standard
Complete document	The policy should be issued as a complete PDF so that wording, approval and review information remain together.
No informal edits	Externally issued copies should not be altered without replacing the full controlled policy.
Review trigger	A review should be considered after material legal, tender, client, staffing, site, supplier or incident-related change.
Responsible ownership	Directors retain overall responsibility for ensuring the policy remains suitable for company operations.

Controlled document note
When issued externally, this policy should be treated as a controlled business document. A plain-language website summary may be used for visitors, but this signed policy PDF remains the authoritative document for formal client, adviser or tender use.

Completion note
This policy has been prepared as a formal, electronically approved document for controlled use by Veraxus Ltd.