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Version	1

Equality, Diversity and Inclusion Policy

Universal Group is an equal opportunity employer and contractor and is committed to encouraging equality, diversity and inclusion among our workforce and eliminating unlawful discrimination.
We aim for our workforce to be truly representative of all sections of society and our customers, and for each employee and contractor to feel respected, valued and able to give their best.
Universal Group will comply fully with the Equality Act 2010 and all other relevant legislation and codes of practice.

Protected Characteristics
Universal Group will take all reasonable steps to employ, train and promote employees and contractors on the basis of their experience, abilities and qualifications without discrimination in relation to the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality and ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

Zero Tolerance of Discrimination
Universal Group will take all reasonable steps to provide a working environment in which all employees and contractors are treated with respect and dignity and which is free from unlawful discrimination, harassment, bullying and victimisation.

Universal Group opposes all forms of unlawful discrimination including:

- Direct discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Failure to make reasonable adjustments for disabled persons

Discrimination will not be tolerated in relation to:

- Pay and benefits
- Terms and conditions of employment
- Recruitment and selection
- Promotion
- Training and development
- Performance management
- Disciplinary and grievance procedures
- Dismissal and redundancy
- Parental leave
- Flexible working requests
- Any other employment decision

Definitions

For the purposes of this policy:
Direct discrimination occurs when a person is treated less favourably because of a protected characteristic.
Indirect discrimination occurs when a provision, criterion or practice is applied which disadvantages people sharing a protected characteristic and which cannot be objectively justified.
Harassment is unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation occurs when a person is treated unfairly because they have made or supported a complaint under this policy or the Equality Act 2010.

Reasonable Adjustments

Universal Group recognises its legal duty to make reasonable adjustments to remove or reduce disadvantages experienced by disabled employees, workers or applicants.
Adjustments may include, but are not limited to:

• Modifying equipment or workstations
• Adjusting working hours or duties
• Providing additional support or training
• Making physical adjustments to premises
Universal Group will consult with the individual concerned when considering appropriate adjustments.

Age Equality

Universal Group believes that everyone should live and work with dignity and respect. Older people are equal members of society and the workforce and shall not be subjected to ageist attitudes, stereotyping or age discrimination. Universal Group will secure the health, safety and welfare of all workers, irrespective of age.

Gender Equality and Empowerment of Women

Universal Group recognises that achieving equality between women and men requires more than equal treatment. It requires active steps to identify and remove barriers that may disadvantage women in employment and within the sectors in which we operate.
In accordance with the Equality Act 2010, Universal Group is committed to eliminating unlawful sex discrimination and promoting equality of opportunity between women and men across all areas of our business.

Universal Group acknowledges that historical and structural inequalities may affect women's participation, progression and representation. Where evidence of disadvantage or underrepresentation exists, Universal Group may take lawful and proportionate positive action in accordance with Sections 158 and 159 of the Equality Act 2010.

Universal Group is committed to:

- Promoting equal opportunity, inclusion and non-discrimination.
- Ensuring fair and transparent recruitment and promotion practices.
- Supporting equal access to education, training and leadership development.
- Providing working conditions that promote health, safety, dignity and freedom from harassment or violence.
- Encouraging leadership accountability in advancing gender equality.
- Promoting ethical and equitable practices within our supply chain and community engagement activities where appropriate.

Universal Group recognises that women are not a homogenous group and that experiences may differ depending on factors such as race, disability, age, religion or belief, sexual orientation or socio-economic background.

Third Party Conduct

Universal Group will not condone any form of discrimination, harassment, bullying or victimisation whether engaged in by employees, contractors or by third parties who do business with Universal Group, including customers, suppliers and visitors. Incidents involving third parties should be reported and will be taken seriously.

Responsibilities

Our commitment to this policy includes training managers and all employees, including contractors, about their rights and responsibilities under this Equality, Diversity and Inclusion Policy.
All individuals are responsible for:

- Conducting themselves in a manner that promotes equality and inclusion
- Preventing bullying, harassment, victimisation and unlawful discrimination
- Treating colleagues, customers and others with dignity and respect

Managers have a particular responsibility to:

- Lead by example
- Ensure fair and consistent application of employment practices
- Address inappropriate behaviour promptly

Employees and contractors have a duty to co-operate with Universal Group to ensure this policy is effective.

Reporting and Complaints

Universal Group will take seriously complaints by employees, customers, suppliers, visitors, the public and any others in the course of work.
You should draw the attention of your immediate line manager to suspected discriminatory acts, practices, bullying or harassment. Where this is not appropriate, concerns may be raised through the Company's grievance procedure.

Universal Group will not victimise or retaliate against any individual who has made allegations or complaints of discrimination or harassment or who has provided information about such matters. Such behaviour will be treated as potential gross misconduct. All complaints will be investigated promptly, sensitively and, where possible, confidentially.

Disciplinary Action

Action will be taken in accordance with Universal Group disciplinary procedure against any employee or contractor who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation.
Serious breaches of this Equality, Diversity and Inclusion Policy may constitute gross misconduct and could render the employee or contractor liable to summary dismissal.
Employees and contractors should be aware that they may be held personally liable for acts of unlawful discrimination and that serious acts of harassment may also constitute a criminal offence.

Monitoring and Review

Universal Group may monitor workforce data, where appropriate and in accordance with UK data protection legislation, to ensure this policy is operating effectively.

This policy will be reviewed annually as a minimum and updated in line with legislative or organisational changes.

Signed 
Richard Lowe
Managing Director

Dated 01/11/2026