



Equal Opportunities Statement and Policy

1. Statement

Wernick Group is committed to building an organisation that makes full use of the different talents, skills, experiences, and cultural perspectives available in a multi-ethnic and diverse society, where employees feel they are respected, valued, and can achieve their potential.

Wernick Group will follow the recommendations from the Employment Statutory Code of Practice, of the Equality and Human Rights Commission, in their employment policies, procedures and practices.

2. Aim

The aim of the policy is to create an organisation that is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive or humiliating environment and ensures that:

2.1 No one receives less favourable treatment on the grounds of

- Age
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Disability
- Sex
- Race (which includes colour and ethnic/national origin)
- Religion or belief (or lack of religion/belief)
- Sexual orientation

or is disadvantaged by any conditions, requirements, provisions, criteria, procedures, or practices that cannot be objectively justified, or is subjected to discrimination, harassment, victimisation, or instructed or pressured to discriminate against or harass another person on any of the above grounds.

The Company will not tolerate direct discrimination, indirect discrimination, harassment, victimisation, discrimination arising from disability, or a failure to make reasonable adjustments as defined by the Equality Act 2010.

2.2 Opportunities for employment, training and promotion are equally open to all candidates regardless of the above characteristics.

2.3 Selection for employment, promotion, transfer and training, including access to benefits, facilities and services will be fair and equitable and based solely on merit and business needs.

3. Standard Company Policy

This Policy applies to all aspects of employment from recruitment through to termination of employment and extends to former employees' rights where required by law. We will take the following steps to put the Policy into practice and make sure that it is achieving its aims.

- 3.1 The Policy will be a priority for the Company.
- 3.2 John Jaggon, Group Chief Operating Officer will be responsible for the day-to-day operation of the Policy.
- 3.3 The Policy will be communicated to all employees and job applicants and will be available on the Company's website.
- 3.4 Employees and any representatives will be consulted regularly about the Policy and about relevant action plans and strategies.
- 3.5 All employees are made aware of their rights and responsibilities under the Policy and on how the Policy will affect the way they carry out their duties.
- 3.6 Managers and Employees in key decision-making areas will receive appropriate guidance and training on the potential discriminatory effect that provisions, practices, requirements, conditions, and criteria can have on different groups, and the importance of being able to justify decisions to apply them.
- 3.7 Complaints about discrimination, harassment or victimisation in the course of employment will be treated seriously and investigated promptly, and if substantiated may result in disciplinary action up to and including dismissal. The Company's Grievance procedure is available to all employees.
- 3.8 Opportunities for employment, promotion, transfer, and training will be available and advertised internally and externally. All applicants will be welcome in line with this Policy.
- 3.9 All employees will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities available within the Company.
- 3.10 Any selection criteria will be entirely related to the job or training opportunity.
- 3.11 We will make reasonable adjustments where required to overcome barriers that make it difficult for employees with a disability to carry out their work.
- 3.12 We will take a flexible approach to working arrangements. We will consider request for changes carefully and objectively, accommodating them where possible.
- 3.13 The Company will take all necessary steps to ensure that employees are legally entitled to work in the UK in accordance with Current Home Office requirements and immigration legislation. Relevant documents will be retained in accordance with legal requirements and Company procedures.

4. Equal Opportunities Monitoring

- 4.1 Where appropriate, information relating to protected characteristics, (which may include ethnic group, sex, sexual orientation and gender reassignment, disability, religion or belief and age) will be collected and analysed for each employee and job applicant to monitor fairness at each stage of the recruitment, training and promotion process. All such data constitutes special category data and will be processed, held and destroyed in the strictest confidence in accordance with UK GDPR, the Data Protection Act 2018, and the Company's Employee Privacy Notice. This information will be used solely for the purpose of promoting and monitoring equal opportunity within the organisation.
- 4.2 If the data shows that people from particular groups are under-represented in particular areas of work, lawful and positive action, training, and encouragement may be considered to improve the chances of successfully applying for vacancies in these areas.

- 4.3 Grievances, disciplinary action, performance assessment, promotions and termination of employment (for whatever reason), may also be monitored, if necessary.
- 4.4 Requirements, conditions, provisions, criteria, and practices will be reviewed regularly in light of the monitoring results and revised they are found to or could cause unlawful discrimination. We will also regularly review advertising, recruitment, and application material, along with our processes and this Policy.
- 4.5 The effectiveness of the Policy will be monitored annually by the Executive Board.

5. Contractors and Clients

- 5.1 All contracts between the Wernick Group and Contractors who supply goods, materials or services will, where appropriate, include a clause prohibiting unlawful discrimination or harassment or victimisation by Contractors and their employees. The clause will also encourage Contractors and potential Contractors to provide equality of opportunity in their employment practices.
- 5.2 Contractors, customers and Clients will be made aware of the Policy and their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sex or sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion, belief, disability, or age.
- 5.3 Fair and equal treatment will be given to Clients, customers and member of public by all employees.
- 5.4 The Company operates a zero-tolerance policy towards any form of discrimination, harassment or victimisation of our employees by customers, clients, contractors, suppliers or other third parties. We are committed to taking all reasonable proactive steps to prevent such behaviours before it occurs. Any complaints raised by employees regarding third-party misconduct will be treated with the utmost seriousness, investigated promptly, and met with firm action. This action may include barring the offending individual from our premises, terminating contracts with the relevant third-party organisation, or reporting the matter to the authorities where appropriate.

6. References: Legislation

In the drawing up and reviewing of this Policy, the Wernick Group recognises its obligations under relevant employment, equality and immigration legislation and including but not limited to:

- Equality Act 2010 (governing protected characteristics and anti-discrimination law)
- The Working Time Regulations 1998 (governing fair working patterns, rest breaks and employee wellbeing).

7. Policy Approval and Review

- 7.1 This Policy has been fully endorsed and approved by the Executive Board, led by David Wernick, (Executive Chairman) and Jonathan Wernick (Group Chief Operating Officer) and has the full support of the Executive Board and the Management Teams.
- 7.2 Originally introduced following employee consultation, this Policy is reviewed on an annual basis to ensure it remains effective, compliant, and aligned with our organisational values.

John Jaggon
Chief Operating Officer

Dated: 10th July 2026