

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



EQUAL OPPORTUNITIES POLICY



POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



CONTENTS

1. AMENDMENTS AND UPDATES	3
2. PURPOSE.....	3
3. SCOPE	3
4. POLICY STATEMENT.....	3
5. DEFINITIONS.....	3
6. PRINCIPLES	5
7. CODE OF PRACTICE	5
8. CODE OF PRACTICE - ADVERTISING	6
9. CODE OF PRACTICE - SELECTION CRITERIA.....	6
10. CODE OF PRACTICE - SELECTION METHODS.....	6
11. CODE OF PRACTICE - INTERVIEWS.....	6
12. CODE OF PRACTICE - REVIEW OF RECRUITMENT PRACTICE.....	6
13. CODE OF PRACTICE - RECORDS.....	6
14. CODE OF PRACTICE - GRIEVANCE AND DISPUTES (RESPONSIBLE STAFF)	6
15. CODE OF PRACTICE - DISMISSAL AND REDUNDANCY (RESPONSIBLE STAFF).....	7
16. ROLES AND RESPONSIBILITIES	7
17. RECRUITMENT AND SELECTION	7
18. TRAINING AND AWARENESS.....	7
19. REPORTING AND COMPLAINTS.....	7
20. COMMUNICATION	7
21. REVIEW AND CONTINUOUS IMPROVEMENT	8

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



1. AMENDMENTS AND UPDATES

ISSUE	DATE	AMENDMENT / CHANGE
FIRST	Unknown	All previous versions saved in 'Archive' server
02	Jan 2026	Template, wording and sections, part of GFS improvement process.

2. PURPOSE

The purpose of this policy is to define Glass and Framing Solutions Limited's position to its commitment on promoting equality, diversity, and including throughout all aspects of our operations.

The purpose of this policy is to ensure that every employee, job applicant, contractor, and business partner is treated fairly and with respect, free from discrimination, harassment, or victimisation.

The company aims to create an inclusive workplace where individual differences are valued and where everyone has equal access to opportunities for employment, development, and progression.

3. SCOPE

This policy applies to:

- All employees (Permanent, temporary, apprentices, agency workers, contractors, and third parties acting on behalf of Glass and Framing Solutions Limited).
- All aspects of employment including recruitment, training, promotion, pay, working conditions, benefits, disciplinary procedures, and termination.
- All locations and operational sites under the Company's control.

4. POLICY STATEMENT

Glass and Framing Solutions Limited will not tolerate any form of unlawful discrimination or unfair treatment based on:

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

The company also prohibits discrimination based on part-time status, trade union membership, or any other characteristics protected under the Equality Act 2010.

5. DEFINITIONS

UNLAWFUL Discrimination is defined as:

DIRECT DISCRIMINATION

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (See perception discrimination below), or because they associate with someone who has a protected characteristic (See discrimination by association below).

DISCRIMINATION BY ASSOCIATION

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

PERCEPTION DISCRIMINATION

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

INDIRECT DISCRIMINATION

Indirect discrimination can occur when you have a condition, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if you can show that you acted reasonably in managing your business i.e. that it is 'a proportionate means of achieving a legitimate aim'.

A legitimate aim might be any lawful decision you make in running your business or organisation, but if there is a discriminatory effect, the sole aim of reducing costs is likely to be unlawful. Being proportionate really means being fair and reasonable, including showing that you have looked at 'less discriminatory' alternatives to any decision you make.

HARASSMENT

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual".

Harassment applies to all protected characteristics except for Pregnancy and Maternity and Marriage and Civil Partnership. However, pregnancy and maternity harassment would amount to harassment related to sex, and harassment related to civil partnership would amount to harassment related to sexual orientation.

Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristics themselves. Employees are also protected from harassment because of perception and association.

THIRD PARTY HARASSMENT

The Equality Act makes you potentially liable for harassment of your employees by people (Third parties) who are not employees of your company, such as customers or clients. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place and have not taken reasonable steps to prevent it from happening again.

VICTIMISATION

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under The Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

PRACTICAL APPLICATION

In the practical application of the Equal Opportunities Policy, it is important that all members of staff guard against discrimination based on assumptions that individuals as members of groups, because of their status, possess characteristics which would render them unsuitable for employment or employment in a specific capacity.

Examples of such assumptions might be:

- Lack of commitment to work.
- Have outside commitments which interfere with work.
- Possess inferior mental / physical ability.
- Produce an expected unfavourable reaction from clients or members of the public.
- Lack of ability to supervise.

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



- Have limited career intentions.
- Be unwilling / unable to undergo training.
- Have limitations imposed by traditional interests or experience.

Any restrictions applied which affect certain groups more than others may effectively result in indirect discrimination and should be reviewed to determine whether they are necessary rather than convenient. If not, they should be removed.

DISABILITY

Subject to any statutory restrictions, applicants with disabilities will be given full and fair consideration for all types of vacancies.

Glass and Framing Solutions Limited will always consider retaining the services of members of staff who become disabled. Staff with disabilities will be given equal opportunities with other staff in the areas covered by the policy and the Equalities Act 2010.

The Equalities Act 2010 give rights to individuals against discrimination where these relate to a protected characteristic.

Glass and Framing Solutions Limited is under legal obligation to fully consider making reasonable adjustments to working practices, equipment, and premises to ensure that a person with protected characteristics is not put at a substantial disadvantage. Such adjustments could include:

- Adjusting premises.
- Allocating some of the persons duties to another person.
- Altering hours of work.
- Specific training.
- Modifying instructions or reference manuals.
- Providing a reader or interpreter.
- Providing supervision.
- Agreeing to a different place of work.
- Acquiring or modifying equipment.
- Transferring the person to fill an existing vacancy.

A failure, without justification, to comply with this duty will amount of an act of discrimination. The Act allows for the financial and other costs to be considered, together with the extent of the employer's financial resources when considering whether it would be reasonable to require the employer to make any adjustments.

6. PRINCIPLES

- **Fair Recruitment:** All recruitment and selection processes will be based on objective criteria, assessing candidates solely on their skills, qualifications, and ability to perform the role.
- **Equal Access to Training and Development:** Every employee will be given the opportunity to develop their skills and advance their career in line with their potential and performance.
- **Inclusive Work Environment:** The company is committed to maintaining a workplace that respects diversity and provides equal opportunity for all.
- **Reasonable Adjustments:** Glass and Framing Solutions Limited will make reasonable adjustments for employees or applicants with disabilities to remove barriers to work and enable full participation.
- **Zero Tolerance for Harassment or Victimisation:** Any behaviour that undermines the dignity or equality of others will not be tolerated and will be dealt with under the Company's disciplinary procedures.

7. CODE OF PRACTICE

Glass and Framing Solutions Limited seeks to ensure that all candidates for employment are treated fairly, and that selection is based solely on the individual merits of candidates and on selection criteria relevant to the post. In pursuance of this aim and of its statutory duties, Glass and Framing Solutions Limited, as an employer is committed to the principal of equality of opportunity and will adhere to the following 'PRINCIPLES' sub sections in conduct or recruitment and selection process for all posts.

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



8. CODE OF PRACTICE - ADVERTISING

Job advertisements will state Glass and Framing Solutions Limited commitment to the principal of equality of opportunity and will be widely publicised to encourage applications from a broad range of suitable candidates from all backgrounds. All job advertisements placed on behalf of Glass and Framing Solutions Limited will include a footnote or final note indicating Glass and Framing Solutions Limited commitment to equality of opportunity.

9. CODE OF PRACTICE - SELECTION CRITERIA

The selection criteria for all posts will be clearly defined and reflected in further particulars sent to candidates, which will also include details of Glass and Framing Solutions Limited commitment to equal opportunity and job qualifications or requirements which would have the effect of inhibiting applications from any of the protected characteristics.

10. CODE OF PRACTICE - SELECTION METHODS

All those handling applications and conducting interviews must be aware of the principles of the relevant Acts of Parliament. Glass and Framing Solutions Limited will ensure training and advice are available further to these requirements. All candidates will be compared objectively with the selection criteria, and all applicants will be processed in the same way.

Information sought from candidates and passed to those responsible for appointments will relate only to the qualification for the requirements of the job. It is recognised that Glass and Framing Solutions Limited has a statutory obligation to make such adjustments to the workplace and to working arrangements as are reasonable to accommodate suitably qualified disabled applicants.

11. CODE OF PRACTICE - INTERVIEWS

The interview criteria will relate to the selection criteria. No questions will be based on assumptions about roles in the home and family or assumed suitability of different ethnic groups for the post in question. Questions about marital status, children, domestic obligations, marriage plans, or family intentions will not be asked at the interview. Questions also about the candidate's ability to 'fit in' may also be construed as unlawful discrimination.

Where it is necessary to obtain information on personal circumstances (i.e. in relation to a selection criterion such as flexibility to work irregular hours) or on whether a candidate will be able to work well with colleagues, these questions will be asked equally to all candidates and, like other questions, will relate only to the job requirements.

In the case of disabled applicants who identify themselves at the application stage, appropriate interview arrangements (Such as access to interview rooms) will be offered to enable the candidates to compete on an equal basis.

12. CODE OF PRACTICE - REVIEW OF RECRUITMENT PRACTICE

Recruitment procedures and practices will be kept under review to ensure that this code is being adhered to. The Health and Safety Advisor shall advise on the operation of this code and for the distribution to those involved in the recruitment and selection processes of information to the relevant Acts of Parliament.

13. CODE OF PRACTICE - RECORDS

Details of candidates and of selection decisions will be kept for at least six months after an appointment has been made, in case they are required as evidence by an industrial tribunal or for other proceedings.

Glass and Framing Solutions Limited will keep records of all candidates and those short-listed and appointed (Records may be used to identify if members of one sex, persons of a certain racial group or those with a disability do not apply for employment).

14. CODE OF PRACTICE - GRIEVANCE AND DISPUTES (RESPONSIBLE STAFF)

Staff responsible for hearing grievances should have regard to the possible effect on an employee's behaviour of:

- Racial abuse or other provocation.
- Communication and comprehension difficulties.
- Differences in cultural background or behaviour.

POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



15. CODE OF PRACTICE - DISMISSAL AND REDUNDANCY (RESPONSIBLE STAFF)

Staff responsible for discipline and dismissal, including redundancy or redeployment, should not discriminate on unlawful grounds. The selection criteria for redundancies should be examined to ensure they are not discriminatory. Staff responsible for discipline or dismissal should recognise the effects that differences in culture can have on behaviour.

16. ROLES AND RESPONSIBILITIES

- **Directors and Senior Management:**
 - Lead by example in upholding equality and fairness.
 - Ensure that adequate resources and training are provided to support this policy.
 - Monitor and review company practices to ensure ongoing compliance.
- **Managers and Supervisors:**
 - Promote equality and inclusion in their teams.
 - Challenge and address any discriminatory behaviour.
 - Ensure recruitment, promotion, and training decisions are based on merit.
- **Employees:**
 - Treat colleagues, clients, and third parties with dignity and respect.
 - Avoid any behaviour that could be seen as discriminatory or harassing.
 - Report concerns or breaches of this policy through the appropriate channels.

17. RECRUITMENT AND SELECTION

- Job descriptions and person specifications will be written to reflect only the requirements of the position.
- Recruitment advertisements will avoid any wording that may discourage certain groups from applying.
- Interview panels will be trained to conduct fair and unbiased assessments.
- Selection decisions will be based solely on merit, ability, and suitability for the role.

18. TRAINING AND AWARENESS

- All employees will receive equality and diversity training during induction.
- Refresher training will be provided periodically to ensure continued awareness of responsibilities.
- Managers involved in recruitment, appraisals, or disciplinary matters will receive additional guidance to prevent bias in decision making.

19. REPORTING AND COMPLAINTS

- Any employee who believes they have been subjected to discrimination, harassment, or victimisation should report it immediately to their line manager.
- Complaints will be investigated promptly, confidentially, and fairly.
- No employee will suffer retaliation for raising a genuine concern in good faith.
- Where breaches are found, appropriate disciplinary action will be taken, up to and including dismissal.

20. COMMUNICATION

This policy will be:

- Made available to all employees through the company intranet and induction process.
- Shared with contractors, suppliers, and partners to reinforce our commitment to equality and inclusion across the supply chain.

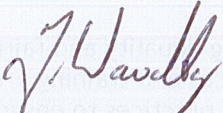
POLICY NAME:	EQUAL OPPORTUNITIES	DATE:	JANUARY 2026
POLICY REVISION:	02	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	JANUARY 2027



21. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be:

- Reviewed annually by Senior Management or more frequently if legislation or business operations change.
- Updated as necessary to ensure continued compliance and effectiveness.
- Supported by periodic audits and feedback mechanisms to identify and address potential weaknesses.

SIGNED:	
NAME:	Tony Waudby
TITLE:	Managing Director
SIGNED FOR:	Glass and Framing Solutions Limited
DATE:	15 th January 2026