



P O L I C Y 0 7 O F 1 6

Equality, Diversity & Inclusion Policy

Real partnership. Real expertise.

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Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltd

www.somaprojectcontrols.com

1. Purpose

This policy sets out SOMA Project Controls Ltd's commitment to creating a workplace and a client-facing practice where everyone is treated with dignity and respect, and where diversity is genuinely welcomed.

2. Scope

Applies to all directors, employees, associates, contractors, clients, suppliers and visitors.

3. Our Commitment

SOMA believes that diverse teams make better decisions, deliver better outcomes and reflect the society we live and work in. We are committed to equality of opportunity and to an inclusive culture free from discrimination, harassment and victimisation.

4. The Law & Beyond

We comply with the Equality Act 2010 and will not tolerate discrimination on the basis of the protected characteristics: age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. Beyond legal compliance, we actively work to create a culture where people feel they belong.

5. What This Means in Practice

- Recruitment decisions are based on merit, competence and potential — with inclusive shortlists and structured interviews.
- Pay, progression and development opportunities are allocated fairly and transparently.
- Reasonable adjustments are made promptly to support disabled colleagues and candidates.
- Flexible working is the default posture, not an exception.
- Client engagements are staffed without discriminatory constraints on team composition.

6. Unacceptable Behaviour

Bullying, harassment, victimisation and discrimination in any form — by any person, at any level, in any setting, including online — is unacceptable and will be treated as a serious disciplinary matter.

7. Raising a Concern

Anyone who experiences or witnesses behaviour that falls short of this policy is encouraged to raise it – with a line manager, with the Director directly, or confidentially under the Whistleblowing Policy. Concerns are taken seriously and handled sensitively.

8. Accountability

The Director is accountable for this policy. Progress on inclusion is reviewed at least annually, and the policy itself is reviewed on the same cycle.

9. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R*Adam O'Neill***Adam O'Neill**

Director

SOMA Project Controls Ltd

Date: March 2026**A P P R O V E D B Y***Stevie MacGregor***Stevie MacGregor**

Director

SOMA Project Controls Ltd

Date: March 2026**N e x t s c h e d u l e d r e v i e w****March 2027**