



EQUAL PAY POLICY

NWH Group Limited
Reviewed- January 2026

Our vision is for the Company to be a successful, caring, and welcoming place for employees and visitors. We want to create a supportive and inclusive environment where our employees can reach their full potential without prejudice and discrimination. We are committed to a culture where respect and understanding are fostered, and the diversity of people's backgrounds and circumstances is positively valued.

This vision includes the principle of equal pay between women and men. Our employees should be treated fairly based on capability and merit rather than biases based on sex. The Company will ensure that all male or female employees have the right to the same contractual pay and benefits for carrying out the same work, work rated as equivalent work or work of equal value.

The Company is dedicated to eliminating pay inequality based on sex. Procedures that determine pay and other conditions should not cause unlawful discrimination and will be based on transparent, objective criteria.

“Pay” for the purposes of this policy is not just salary/wages (remuneration) but also other terms and conditions of employment such as bonuses, promotion opportunities and training programmes that may be offered by the Company.

The principle for determining equal pay between roles is that the work being undertaken is substantially similar or of equal value unless there are clear or specific reasons unconnected with sex to explain/justify any difference in pay.

Some reasons unconnected with sex that may justify pay differences include factors relating to differences in positions, senior/junior roles, qualifications held or experience.

This policy is connected with the other equality and diversity policies that the Company operates, stemming from the Equality Act 2010.

What is an equal pay claim?

The principles of equal pay apply to all workers, including full—or part-time employees, casual workers, and temporary workers.

The Equality Act 2010 contains the rights of workers and obligations of employers regarding equal pay, amongst other areas of equality such as sex and race discrimination provisions. Previous cases heard at the European level have been highly influential in this

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area and continue to guide best practices. The governing principle enables an employee to compare with the contractual entitlements a 'named comparator' enjoys.

There are several bases for making a claim. Comparisons can be based on:

- like work
- work rated as equivalent.
- work of equal value.

These comparisons include all contractual terms and pay. The men and women should be in identical situations for the comparisons to be made.

Company commitments

As set out within this policy, the Company is committed to the following:

- to create an environment in which individual differences and the contributions of our staff are recognised and valued
- every employee, worker or self-employed contractor is entitled to a working environment that promotes dignity and respect to all
- provide training and development to all supervisors and managers involved in pay and pay practices.
- provide information to employees on pay practices and how their pay is determined.
- ensure that progression opportunities are available to all staff.
- equality of pay in the workplace is good management practice and makes sound business sense
- we will review all our employment practices and procedures to ensure fairness.
- undertake annual equal pay audits and take any steps required to resolve any issues.

Grievance procedure

Suppose an employee wishes to raise any concerns about their circumstances. In that case, they may do so informally in the first instance but are free to file a complaint under the Company's grievance procedure so that any concerns can be adequately investigated.

Equal pay grievances are treated as matters of priority, and the Company will not unreasonably delay any reviews or investigations into equal pay matters.

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More general comments and feedback on the policy can be directed to your line manager or, if that would be inappropriate, the HR department. The Company will take appropriate action based on the concerns received.

Responsibilities

The board has the ultimate responsibility for ensuring the effectiveness of this policy. HR is responsible for implementing and monitoring this policy.

Monitoring reports on its implementation are provided to the Board. The Company will monitor the effectiveness of this policy and its impact on all other relevant policies and practices. This review will happen when necessary and, at minimum, annually.

Any employee complaints under this policy will be summarised into statistics for the monitoring reports. No personal or other identifiable data will be included in the statistics, which are for monitoring purposes only. All employees involved in recruitment and selection, together with matters involving remuneration such as job promotions, pay reviews, etc., have a responsibility to ensure that equal pay principles are adhered to lawfully.

Signed:

Date: 15/01/2025

Gavin Money

Managing Director

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