

DIVERSITY & EQUALITY

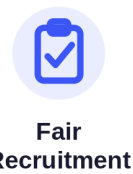
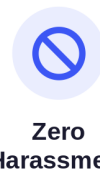
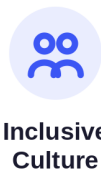
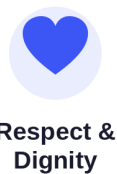
Respecting, valuing and including every individual



Wavepoint Group Limited — Our commitment to equality, diversity and inclusion

Document owner	Managing Director	Policy reference	WPG-HR-03
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Approved by	Jason Alexander, Managing Director	Applies to	All employees, workers & applicants

OUR EQUALITY COMMITMENTS AT A GLANCE



This policy applies to all employees of Wavepoint Group Limited (“the Company”).

1. Our Commitment

The Company is committed to creating a culture that respects and values each other’s differences, that promotes dignity, equality and diversity, and that encourages individuals to develop and reach their full potential. We are committed to equality of opportunity and to eliminating direct and indirect discrimination, harassment and victimisation of employees, job applicants, customers and contractors.

It is our policy to treat all employees, potential employees, customers and other stakeholders fairly and equally, and to ensure that no individual receives less favourable treatment on the grounds of a protected characteristic. Equality in the workplace is good management practice, makes sound business sense, and helps us make the best use of our most valuable asset — our people.

2. Scope

This policy applies to every aspect of employment, including recruitment and selection, terms and conditions (including pay), promotion, training, transfer, discipline and every other aspect of the working relationship. It also covers the way we treat customers, suppliers, contractors and members of the public. Every line manager and employee has personal responsibility for implementing this policy.

3. Legal Framework

This policy reflects our obligations under the Equality Act 2010 and related legislation. It also reflects the duty introduced by the Worker Protection (Amendment of Equality Act 2010) Act 2023, in force since 26 October 2024, which requires employers to take reasonable steps to prevent the sexual harassment of their workers. We keep our arrangements under review in light of developing law, including the strengthening of this duty under the Employment Rights Bill.

4. Protected Characteristics

The Equality Act 2010 protects people from discrimination on the basis of nine protected characteristics:

- Age — belonging to a particular age or range of ages.
- Disability — a physical or mental impairment that has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities.
- Gender reassignment — the process of transitioning from one gender to another.
- Marriage and civil partnership.
- Pregnancy and maternity — including treating a woman unfavourably because she is breastfeeding.
- Race — including colour, nationality, and ethnic or national origins.
- Religion or belief — including religious and philosophical beliefs, and a lack of belief.
- Sex.
- Sexual orientation.

5. Types of Discrimination

- Direct discrimination — treating someone less favourably than another because of a protected characteristic.
- Associative discrimination — direct discrimination against someone because they associate with a person who has a protected characteristic.
- Perceptive discrimination — direct discrimination against someone because others think they have a protected characteristic, even if they do not.
- Indirect discrimination — where a condition, rule, policy or practice applies to everyone but particularly disadvantages people who share a protected characteristic, and cannot be objectively justified.
- Harassment — unwanted conduct related to a protected characteristic which violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- Victimisation — treating someone badly because they have made or supported a complaint, or are suspected of doing so, under the legislation.

6. Dignity at Work — Preventing Harassment and Bullying

Every employee is entitled to a working environment that promotes dignity and respect. No form of intimidation, bullying or harassment — including sexual harassment — will be tolerated, whether by colleagues or by third parties such as customers or suppliers. In line with our legal duty, we take reasonable steps to prevent sexual harassment, including risk awareness, clear reporting routes, training and the prompt handling of concerns.

Anyone experiencing or witnessing intimidation, bullying or harassment should raise it with their line manager or the Group HR Department, or through the Grievance or Whistleblowing procedures. Please also refer to the Bullying & Harassment Policy.

7. Equality in Employment Practices

Recruitment, selection and advertising

- We will not discriminate unlawfully in deciding who is offered employment, in the terms on which it is offered, or by refusing employment.
- Recruitment advertising states that we are an equal opportunities employer and welcomes applications from all, with clear instructions on how to apply.
- Selection criteria are based on the job and person specification, measuring only relevant competencies so that candidates equally able to do the job are equally able to meet the criteria.

Interviews and reasonable adjustments

All candidates are asked in advance whether they need any adjustments so that they are not disadvantaged at interview (for example, an accessible interview room, or being accompanied by a signer or interpreter). Employees who are or become disabled are encouraged to tell us about any reasonable adjustments that may help them; we give careful consideration to any proposals and make adjustments where reasonable and reasonably practicable.

Promotion, transfer and training

- Decisions on promotion, transfer and access to training are based on objective, justifiable criteria, free from bias and unlawful discrimination.
- Those involved in recruitment, training or promotion receive equal opportunities training and may request further training where needed.
- Performance reviews are conducted fairly and without discrimination.

Communications

We make every effort to avoid gender-biased language and offensive terminology or imagery in our internal and external communications, and to promote inclusive language and imagery.

8. Monitoring and Assessment

- We monitor the composition of our workforce and job applicants on an anonymous basis, using information provided solely to assess the effectiveness of this policy.
- Where inequalities in recruitment, training or promotion become apparent, lawful positive action may be taken to redress the imbalance.
- We monitor the number and outcome of complaints under this policy and the Bullying & Harassment Policy, and report to the Board annually.
- Where business needs allow, we will consider flexible working for employees and applicants with caring or childcare responsibilities.

9. Raising Concerns

If you have any concern about inequality of opportunity, discrimination, harassment or victimisation, you should raise it through the Company's Grievance Procedure, or through the Whistleblowing (Disclosure) Policy where the Grievance Procedure is not appropriate. We want everyone to feel comfortable raising such concerns, and no one will be penalised for raising a genuine complaint in good faith.

10. Responsibilities and Breaches

Every manager and employee has a personal responsibility to implement this policy and to ensure their actions, attitudes and behaviour do not directly or indirectly discriminate against others. Questions about the application of this policy, or requests for training, should be directed to the Group HR Department. Any act of discrimination, harassment or victimisation, or any failure to comply with this policy, will be treated as misconduct and may lead to disciplinary action up to and including summary dismissal.

Approved and signed on behalf of Wavepoint Group Limited



Signed	Jason Alexander
Position	Managing Director (Employer)
Date	24 June 2026
Review date	24 June 2027

— End of Diversity & Equality Policy —