

EQUAL OPPORTUNITY AND DIVERSITY POLICY

1. Introduction

Cleveland Cable Company believes the skills, capabilities and talents of its employees are the key to its success. The Company benefits enormously from the diversity and variety of its workforce and is fully committed to maintaining and encouraging this diversity. The richer the mix of people, skills and cultures in the Company, the greater the range of inputs, viewpoints and experiences. Because of this, Cleveland Cable is fully committed to being an equal opportunities employer, enriched by its diversity and opposed to all forms of unlawful and unfair discrimination.

The Company is committed to equality of opportunity, which refers to the fair treatment of individuals at work with employment decisions being made on relevant, objective criteria. The Company will not discriminate on the grounds of gender, race, disability, sexuality, religion, religious or philosophical belief, trade union membership or age.

Diversity is about bringing together a rich mix of people with differing perspectives and from different backgrounds, and creating an environment in which those differences are valued. Diversity improves competitiveness by enlarging the potential for ideas and innovation, one of Cleveland Cable's key principles. It is therefore a business imperative and part of the Company's corporate and social responsibility.

2. Purpose

The purpose of this policy is to:

- Explain Cleveland Cable's principles on equality and diversity;
- Provide a framework for putting these principles into practice;
- Explain the types of behaviour that are not acceptable and how the Company will deal with such behaviours.

3. Guiding Principles

Cleveland Cable operates in a variety of social structures, cultural structures and locations. Because of this variety, the Company promotes equality of opportunity and diversity in all its locations. The only requirements for successful employment will be talent and performance.

As an employee of Cleveland Cable, you will be treated fairly and with respect. You will be encouraged to develop your full potential, ensuring your talents are fully utilised for the benefit of the organisation. You will also be expected to act within the guidelines of some basic behavioural principles. To this end, Cleveland Cable has established the following guiding principles for managing equality of opportunity and diversity:

- An ongoing commitment to diversity by ensuring that the relevant policies, practices, metrics and action plans are in place to reflect the underpinning equal opportunity legislation;
- The Company is committed to creating an environment in which individual differences and the contribution of all employees are recognised and valued;
- The Company is committed to providing every employee with a working environment that promotes dignity and respect for all;
- The Company will support every individual to perform their work and develop their potential regardless of gender or sexual orientation, race or ethnicity, religion, age, disability, beliefs or trade unions membership;
- For groups within society who have not had equal access to education and training, the Company will actively support partnerships to develop their talent and potential; Irrespective of their gender or sexual orientation, race or ethnicity, religion, age, disability, beliefs or trade unions membership the Company is committed to:
 - identifying and developing high potential individuals within the organisation and externally
 - maintaining and improving employability through training and development
- The Company will monitor and benchmark equality of opportunity and diversity, encouraging continuous improvement throughout the business;
- The Company will not positively discriminate on any grounds, as equality is always about the best person for the role;
- The Company is opposed to all forms of intimidation, discrimination, harassment, bullying and victimisation;

The Company understands having a truly diverse workforce goes beyond simply establishing a policy and monitoring a set of statistics and is about a mindset. The Company also recognises that a truly diverse workforce will benefit our understanding of the marketplaces we operate in, our understanding of the needs of our customers, our access to a wide pool of talented employees and ultimately improve our productivity and effectiveness. Therefore, we are committed to the above principles, which will be applied in our relations with customers, suppliers and contractors.

4. What is Harassment, Bullying and Victimisation?

Harassment, Bullying and Victimisation can be defined as any unwanted conduct that has the effect of violating your dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. This type of environment is not conducive to enabling you to perform to the best of your abilities, and hence the Company is committed to eradicating these behaviours

wherever they are known to exist. It is not the intention of the perpetrator that is important when considering whether these actions have taken place, but your perception of the behaviour.

5. What to do if you are the victim of Harassment, Bullying and Victimisation

The Company has a separate Harassment, Bullying and Victimisation Policy which you should refer to for advice and guidance as to the steps to follow.

6. Responsibilities

Throughout your career with the Company, you will be treated no less favourably, nor be disadvantaged by conditions, requirements or practices which cannot be shown to be just, fair and based upon your ability. This will be reflected in the application of the recruitment, selection, promotion, transfer, training, performance management, reward, disciplinary and grievance procedures and termination of employment. Within the Company we all have a responsibility to uphold the principles of the Equal Opportunity and Diversity Policy, but some groups or individuals have particular responsibilities, which are outlined below:

6.1 Director / Senior Manager

The Directors and Senior Managers of Cleveland Cable Company are responsible for implementing actions to meet our targets, standards and our diversity aims. These would typically include monitoring, training and internal audit of our processes.

6.2 Manager

One of the Cleveland Cable behavioural competencies Managers should possess is the ability to demonstrate the Cleveland Cable values. An important part of this is the ability for every manager to demonstrate, with their words and actions, that they understand, believe in and demonstrate the principles of equal opportunity and diversity. Whilst a Cleveland Cable Manager would be expected to demonstrate these principles in every aspect of their work there is particular relevance to the situations below:

Training and Development, Promotions and Transfers

Your training and development needs will be treated according to their individual merits, based business and individual requirements. You will be provided with equal and fair access to all training and development opportunities appropriate to your role, personal development and further career within Cleveland Cable. This may include the opportunity to apply for and gain access to promotion and / or a transfer to another role (see below under recruiter).

Reward

You will be fairly rewarded for the work that you do, irrespective of gender or other unfair criteria. The Company will ensure this by operating and maintaining reward systems that provides all employees with the same pay and conditions for work which is the same or broadly similar, has been rated as equivalent and is of equal value in terms of effort, skill, knowledge and responsibility

Dialogue

Your dialogue is a planned time for you and your manager to formally discuss your objectives, development and career aspirations. Your dialogue will be conducted fairly and objectively, based upon your achievements and ability, taking into consideration any factors which may have an impact on these.

Performance Management

in the course of your career with Cleveland Cable, you are likely to have frequent discussions with your manager about your 'performance at work outside of the formal dialogue. These discussions will be subject to the same principles of fairness and objectivity, free of any unlawful or unfair discrimination, harassment or prejudice.

Disciplinary and Grievance Procedure

As a manager you may be required to use either the disciplinary and / or grievance procedures. As a manager if you are required to handle these situations you must ensure that you do not discriminate, either directly or indirectly, and handle these situations according to Company policy, with any decisions you make being free from unlawful or unfair discrimination, harassment or prejudice.

Termination of Employment

As a manager within Cleveland Cable it is normal and likely that members of your team will leave the Company from time to time. There are a number of potential reasons for leaving the Company, which may include resignation, retirement, dismissal or redundancy. As a manager you are required to handle these situations according to Company policy, with any decisions you make being free from unlawful or unfair discrimination, harassment or prejudice.

6.4 Recruiter

To attract the most suitable candidates for the role, job advertisements will not be confined to areas or publications that would exclude or disproportionately reduce the number of applicants. In fact, we will seek to address these through our attraction and employment strategies. When you apply for a job with Cleveland Cable, your application will be matched against a clear role and person specification.

Interviews and selection centres will be based upon the role description and person specification. Taken together, the role description, person specification and analysis of your application will form the framework for the selection procedure. Should you have a disability you are encouraged to disclose the details of any disability you may have to the Company at the application stage. This is so any reasonable adjustments can be made to the recruitment and selection procedures. The same fair and objective selection criteria as applied in the recruitment and selection process applies equally for promotion or transfer opportunities.

We will seek to ensure that everyone undertaking recruitment on behalf of the Company has received training in Equal Opportunities and Diversity.

6.5 Employee

Every employee has a responsibility to understand the principles of Equal Opportunity and Diversity which Cleveland Cable is committed to and it is important that our behaviour at work reflects these values. If you have any questions or queries regarding the principles of Equal Opportunity and Diversity you should first talk to your manager, who should be able to help you.

6.6 Customer / Contractor / Third Party provider

Every employee has a responsibility to every customer / contractor or third party provider to ensure that they are treated in accordance with the principles set out by the Equal Opportunity and Diversity policy. Equally there is responsibility from our customers / contractors and third party workers to treat Cleveland Cable employees in the same way.

Employees should not be exposed to harassment, bullying or victimisation of any sort when on Company business, whether on Company premises, customer premises or elsewhere, and equally should not subject anyone to harassment, bullying or victimisation.

7. Monitoring

The purpose of monitoring is to determine if the policy and the actions it generates are working effectively. The Company will establish structures and techniques to monitor equality of opportunity in, for example, ethnicity, race, gender and disability throughout the employment process. This information will only be collected in support of the Company's aim of being an equal opportunities employer and will be consistent with the recommendations of the Commission for Equality and Human Rights.

The Company is committed to regularly reviewing the policy to determine its effectiveness.

Signed:

A handwritten signature in black ink, appearing to read "Alistair Powell", written over a light blue horizontal line.

Alistair Powell
Managing Director
Cleveland Cable Company Limited
Dated: 06 Jan 2022