SPIRITMEDIA.

Equality, Diversity and Inclusion Policy

Issued: August 2026. Next review: August 2027.

1. Statement of Policy

Spirit Media Scotland is committed to equality of opportunity, to eliminating unlawful discrimination, and to fostering an inclusive working environment in which everyone is treated with dignity and respect. This policy is made under, and is to be read consistently with, the Equality Act 2010.

This policy applies to job applicants, employees (full-time and part-time), freelancers and contractors working on our behalf, and anyone on a work placement with us. It covers every stage of the working relationship: recruitment and selection, terms and conditions, pay, training and development, promotion, day-to-day treatment, and the ending of employment.

2. Protected Characteristics

It is our policy that no one receives less favourable treatment because of any of the protected characteristics in the Equality Act 2010:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality and ethnic or national origins)
- religion or belief (including lack of belief)
- sex
- sexual orientation

3. What We Will Not Tolerate

We are opposed to all forms of unlawful discrimination, whether direct or indirect, and to harassment and victimisation. Decisions about recruitment, selection, promotion, training and any other benefit will be made objectively, on merit, and without unlawful discrimination. Breaches of this policy will be treated as misconduct and may lead to disciplinary action, up to and including dismissal for serious breaches.

4. Preventing Sexual Harassment

Under the Worker Protection (Amendment of Equality Act 2010) Act 2023, we have a proactive duty to take reasonable steps to prevent sexual harassment of our employees. We take that duty seriously in every setting in which our people work, including video calls and messaging platforms, client meetings, supplier events and industry gatherings. Any employee who experiences or witnesses sexual harassment - including from clients, suppliers or other third parties - should report it to either Joint CEO, and every report will be treated seriously, confidentially and without reprisal.

5. Inclusion in a Remote Business

As a fully remote business we will make reasonable adjustments for disabled employees and applicants, including to home workstation equipment, software and accessibility tools, and to how meetings and communications are run. All employees have the statutory right to request flexible working from the first day of employment, and we support flexible and family-friendly working patterns where they can be accommodated.

6. Responsibilities

The Joint CEOs are responsible for the effective implementation of this policy, for ensuring it is communicated to employees, applicants and others working with us, and for ensuring that anyone

involved in recruitment or promotion decisions understands their obligations under it. Every employee shares responsibility for upholding this policy and for treating colleagues, candidates, clients and suppliers with respect.

Where we engage subcontractors, freelancers or agencies, we expect them to comply with the principles of this policy in their dealings with our organisation and our people.

7. Raising a Concern

Any employee who believes they have experienced or witnessed discrimination, harassment or victimisation should raise it with either Joint CEO, or through the grievance procedure. No one will be victimised or suffer any detriment for raising a concern in good faith.

8. Review

This policy will be reviewed at least annually by the Joint CEOs, and additionally on any relevant change in the law or in our working arrangements. Its operation will be kept under review in a manner proportionate to the size of the organisation.