

PART I: POLICY DETAILS

1. What does this policy cover?

We do not tolerate discrimination or harassment in any part of BORA MEDIA LTD's operations. We are fully committed to promoting equal opportunities in employment.

So, this policy covers any and all aspects of our company operations, how we treat those who work for and with us and how we recruit or engage others to join that community.

This means that our policy covers, but is not limited to, the following:

- a. Your pay and your employment conditions
- b. Our recruitment processes
- c. How we may appraise, reward, incentivise, promote, train, and commit to the continuing professional development of our workers
- d. Our procedures for addressing grievances and disciplinary matters
- e. How we end employment contracts and exit employees, including related matters, such as how we give references
- f. How visitors, clients and suppliers and other key business contacts and stakeholders are treated

It also means that we will ensure, as far as possible:

- a. full access to everyone applying for job vacancies and job opportunities with our business, and
- b. that all relevant decisions are made on the basis of objective criteria.

You should familiarise yourself with this policy and all BORA MEDIA LTD's other policies, including, in particular our Grievance Policy and our Harassment and Bullying Policy.

2. Who does it apply to?

All employees, apprentices, consultants, officers, contractors, interns, volunteers, job applicants, agency and casual workers.

3. It is not part of your employment contract

This policy is not part of your employment contract. We, BORA MEDIA LTD may amend this policy at any time.

4. What is discrimination?

Under UK employment law, there are a number of characteristics relevant to an individual who is covered by the policy that must not unfairly be considered (if accounted for at all) in decisions relating to any aspect of their working life.

These characteristics are called 'protected characteristics' and they are listed immediately below:

- a. Age
- b. Disability
- c. Gender reassignment
- d. Marital or civil partnership status
- e. Pregnancy or maternity
- f. Race (which includes colour and ethnic/national origin)
- g. Religion or belief
- h. Sex
- i. Sexual orientation

If employment-related decisions are made about an individual on the basis (whether wholly or partially), of any of these protected characteristics, it is almost inevitable that unlawful discrimination will have taken place.

The sorts of actions that would fall into this category of unlawful and prohibited initiatives, include (but aren't limited to) those set out below. These actions need not be intended or directly committed by someone (indirect responsibility may be sufficient for someone to have unlawfully discriminated) and an omission or failure to do something may be just as culpable as a positive action.

We will not tolerate their practice by anyone within our business:

a. Direct discrimination...

when someone with a protected characteristic is treated less favourably than somebody else has or would have been in identical circumstances. An example of this would be where an applicant for a job is rejected on grounds of their racial background. Further examples would be where a pregnant employee, or one with young children, is not promoted

b. Indirect discrimination...

when a group of people with one of the protected characteristics is disadvantaged by a provision, criterion or practice that is applied to all staff (unless the treatment may be justified for a good business reason). Examples of this would be:

- a. Insisting, without good reason, that all staff must work full time, (which indirectly discriminates anyone with child-care responsibilities, women in particular)
- b. Requiring all staff to work onsite and refusing to consider a request to work remotely or under alternative conditions, like flexible hours to avoid commute times, which could disadvantage someone with a disability or a phobia (e.g. someone who suffers claustrophobia or panic attacks on commuting routes)
- c. Refusing to provide a room for reflection and prayer, which would discriminate against individuals practising certain faiths
- d. Dismissing or not employing a woman because she is pregnant or of child-bearing age

c. Harassment...

covers hostile, humiliating, degrading, intimidating or similarly offensive treatment or conditions to which an individual with one or more protected characteristics is subjected. Any such actions deprive an individual of their dignity and violate them. We draw no distinction between actions that may be labelled as 'joking' and not intended to cause offence, and those that may have been more direct and premeditated in their delivery. So, for example, in line with legal definitions, reflecting general standards of decency, we will regard any of the following as falling within the definition of harassment:

- a. making lewd comments and/or displaying pornographic material
 - b. calling someone unkind, derogatory or otherwise unwelcome names or nicknames
 - c. making insensitive jokes, whether about someone directly, or the content of which would be evidently offensive to anyone with a protected characteristic
 - d. excluding colleagues and/or making them feel that they have no option but to exclude themselves
- You should refer to our Bullying and Harassment Policy for a full run-down of the matters that we consider to be covered by this definition.

d. Victimisation

This has a particular meaning under UK employment law and it is narrower than an ordinary dictionary definition, covering the situation only where:

- a. a worker has complained of discrimination (or harassment),
- b. or has supported a fellow worker in making a complaint about these concerns, and has then suffered reprisals from others, including those responsible for that worker's employment prospects and working conditions.

e. Other discriminatory actions that are also prohibited

The UK's employment law also identifies other actions that can be unlawful under the equal opportunities legislation. Examples of these include:

- a. Failing to make reasonable adjustments to minimise certain disadvantages suffered by a disabled employee (or job applicant)
- b. Instructing another person (or applying pressure on them) to discriminate
- c. Knowingly assisting somebody else when they carry out a discriminatory act
- d. Discriminating against somebody believed to have a protected characteristic, whether or not they actually do, or because they associate with a third party who does.

PART II: OUR PROCEDURES AND APPROACH TO THIS POLICY

1. Duties and responsibilities

Overall responsibility for the effective implementation and operation of the policy lies with BORA MEDIA LTD'S management, specifically with the directors and our HR team. All managers are expected to lead by example, and attain and maintain appropriate standards of behaviour within the teams they manage.

However, everyone who works in and with BORA MEDIA LTD is responsible for ensuring that this policy works to prevent the activities that it prohibits from taking place within our business.

Because we are a values-led business, this goes beyond the legal obligations that each one of us has, (and regardless of our job titles or how long any of us has worked for or with BORA MEDIA LTD.

However, you need to be aware that the breach of these legal obligations alone will mean that any individual can be found personally liable for unlawful discrimination where they have breached this policy and they will face disciplinary action by us and potentially other legal actions. This is because if you breach this policy, you may also make the Company liable for your actions, and both of us may have to pay compensation to anyone who claims against us.

We therefore expect you to take personal responsibility for adhering to this policy's aims and commitments and for promptly and appropriately drawing any breaches of them to our attention.

We always welcome feedback on how we can best promote and ensure equal opportunities throughout BORA MEDIA LTD. Please let your manager know if you have any ideas or would like to be involved in any of our existing initiatives.

2. Recruitment, promotions and identifying candidates for other opportunities

In any selection process that we use within our business, whether we're selecting interviewees for job opportunities, offering jobs, identifying individuals for promotion or considering other opportunities or necessities (like redundancy situations), we will apply a rigorous, objective selection process using non-discriminatory criteria, as far as possible.

We emphasise here, however, that both direct and indirect age discrimination may be justified and lawful, if the less favourable treatment, criterion or practice amounts to a proportionate means of achieving a legitimate aim.

A legitimate aim must relate to a genuine business need on our part that is not related to age discrimination itself. For example, a legitimate aim potentially justifying age discrimination might include:

- Economic factors such as business needs and efficiency;
- The health, welfare and safety of the individual concerned (including the protection of young people or older workers);
- The particular training requirements of the job.

All job adverts and opportunity announcements must be:

- Discussed with and signed off by the Human Resource manager, one of whose responsibilities is to ensure that any advert is compliant with this policy
- Located and/or circulated so as to reach as wide and diverse a pool of interested candidates as possible, and
- Worded so as to encourage, as far as possible and reasonable, applications from individuals of all characteristics to apply – or, at the very least, so as not to discourage any individuals with protected characteristics from applying.

There may be circumstances where some indication of required skills (that do discriminate) is justified and where self- deselection is inevitable, for example, where the job vacancy is for a window cleaner who works at height, wearing abseiling harnesses. The job advert might specify that interested candidates must be willing and capable of abseiling to be considered for the job.

If you are involved in interviewing and or any other part of our recruitment process, you must never ask a job applicant about their health, attendance record, or whether they have a disability before making a job offer to them (except in very limited circumstances).

You can ask someone if they have any particular needs or requirements with which you can assist if they are coming to meet you for an interview. In certain limited cases, it may also be permitted to make a job offer conditional on a successful medical examination.

During interviews or other interactions with candidates for a role, you must not ask anything that might infer a bias against any candidate with one or more protected characteristics. So, for example, asking a candidate if they are married, intend to have children (or any more children), or whether their religion permits them to work at weekends, are strictly no-go zones.

If you are ever in doubt about what can or must not say, or if you believe that a particular job vacancy needs a medical examination as part of the recruitment or onboarding process, you must check the position with the Human Resource manager.

3. Monitoring the policy and our personnel

During any recruitment and onboarding process, we may ask questions that include some protected characteristics to help us monitor our diversity and how we are succeeding in our commitment to promote equal opportunities. Including health or disability questions in equal opportunities monitoring exercises is acceptable, but the data gathered must not be used for any employment-related decisions, such as whether to offer a role or opportunity to a particular candidate.

We may also record and analyse information about equal opportunities more generally within the workplace. We do this so that we can make sure this policy operates successfully. The data helps us to refine it, review the composition of our workforce, and to promote workplace equality.

When you join the Company, you give us consent to gather and process this data about you.

4. Handling breaches and enforce

We take all allegations of breach and any breaches that we discover very seriously. All allegations and/or suspicions of breach will therefore be thoroughly investigated.

If you wish to complain or raise an allegation of breach (or potential breach) under the policy, you should contact the Human Resource manager or your line manager as soon as possible. If you want to take formal action, you will need to follow our grievance procedure and read our policy on harassment and bullying.

Anyone raising a concern about matters covered by this policy, who does so in good faith, will have our full support and co-operation in getting to the bottom of what has happened and any appropriate action that needs to follow on from that examination. This will be the case regardless of our conclusions and including where we determine that the allegation was mistakenly made. There will never be any reprisals against those who genuinely have, or consider that they have, valid grounds to bring concerns about discrimination to our attention.

However, complaints made in bad faith, for whatever reason (including where this is an attempt to avoid or to deflect disciplinary action), will be treated as misconduct and may lead to a dismissal for gross misconduct.

We will also take prompt disciplinary action against you if we discover that you have harassed or discriminated against anyone else in breach of this policy. If we conclude that your behaviour amounts to gross misconduct, we will be within our rights to dismiss you without notice and with no payment in lieu of that notice.

Monitoring and Reviewing

BORA MEDIA LTD has declared its commitment to establishing, developing, implementing and reviewing a policy of equality of opportunity. Effective record keeping and monitoring, and acting on information gathered, are essential in order to measure effectiveness and plan progress. The management committee will review the policy annually.

This statement is valid for 1 year and has been approved by the board of BORA MEDIA LTD at the board meeting on 18/11/2022.

[Signature]



Name: Hakeem Ssozi

Position : Chief Executive Officer

[Date] 18/11/2022