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Equality, Diversity & Inclusion Policy

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1. PURPOSE

The purpose of this Policy is to define Nano Fibre UK's approach to equality, diversity, and inclusion (EDI), ensuring compliance with the Equality Act 2010 and establishing a consistent, fair, and inclusive working environment across all areas of the business.

Nano Fibre UK will ensure that equality, diversity, and inclusion are embedded into all aspects of organisational activity, including leadership, decision-making, operational processes, and employee behaviour.

This Policy is designed to ensure that all individuals are treated with dignity, fairness, and respect, and that no individual is disadvantaged or excluded due to a protected characteristic or any other unjustifiable factor.

This Policy will:

- Establish clear standards for fair, consistent, and lawful treatment of all individuals
- Prevent unlawful discrimination, harassment, victimisation, and exclusionary behaviour
- Promote a workplace culture where diversity is recognised as a strength and inclusion is actively demonstrated
- Define expected behaviours and responsibilities across all levels of the organisation
- Provide clear reporting, escalation, and resolution mechanisms
- Support compliance with applicable legislation and reduce the risk of employment tribunal claims and legal exposure

Nano Fibre UK will:

- Ensure that equality and inclusion are considered in all business decisions, including recruitment, promotion, and operational planning
- Actively identify and remove barriers to participation, progression, and opportunity
- Promote a culture where individuals feel safe, respected, and able to contribute fully
- Ensure that inappropriate behaviour is challenged and addressed promptly and effectively

Equality, diversity, and inclusion will not be treated as standalone initiatives but will form part of the Company's core operational and cultural framework.

Failure to manage equality, diversity, and inclusion effectively may result in:

- Breaches of the Equality Act 2010
- Employment tribunal claims (e.g. discrimination, harassment, unfair treatment)
- Reputational damage
- Reduced employee engagement and retention

Nano Fibre UK will take all reasonably practicable steps to mitigate these risks through the implementation of this Policy and associated controls.

This Policy forms part of the Nano Fibre UK Integrated Management System (IMS) and supports:

- Fair and consistent people management practices

- Employee wellbeing and engagement
- Risk management and legal compliance
- Continuous improvement of workplace culture

All employees, managers, and stakeholders must ensure that equality, diversity, and inclusion principles are applied consistently in day-to-day operations.

2. POLICY STATEMENT

Nano Fibre UK is committed to creating and maintaining a workplace that is inclusive, respectful, and free from unlawful discrimination, harassment, and victimisation.

All individuals will be treated fairly, consistently, and with dignity, regardless of their background, personal characteristics, or circumstances. The Company will ensure that all employment-related decisions are based on objective, job-related criteria and are free from bias or unjustifiable influence.

Nano Fibre UK will ensure that:

- Equal opportunities are provided in all aspects of employment
- Individuals are not disadvantaged due to protected characteristics as defined under the Equality Act 2010
- Decisions relating to recruitment, promotion, training, and performance are fair, consistent, and evidence-based
- Barriers to opportunity are identified and removed where reasonably practicable

The Company will take proactive steps to promote fairness and prevent discrimination across all areas of the business.

Nano Fibre UK recognises that a diverse and inclusive workforce strengthens business performance, innovation, and employee engagement.

The Company will:

- Foster an environment where differences are respected and valued
- Encourage inclusive behaviours across all teams and functions
- Promote equal participation and opportunity for all individuals
- Ensure that all employees feel able to contribute without fear of exclusion or unfair treatment

Inclusion must be actively demonstrated in day-to-day behaviour, not assumed.

All employees are expected to contribute to a respectful and inclusive working environment.

Employees must:

- Treat colleagues, customers, and third parties with dignity and respect
- Be mindful of how their behaviour may impact others
- Avoid conduct that could be considered discriminatory, offensive, or inappropriate
- Challenge or report unacceptable behaviour where it is safe and appropriate to do so

Behaviour will be assessed based on its impact, not the intention behind it.

Nano Fibre UK will not tolerate:

- Discrimination (direct or indirect)
- Harassment or unwanted conduct
- Bullying or intimidation
- Victimisation of individuals who raise concerns

Any such behaviour will be taken seriously and addressed through appropriate procedures, which may include disciplinary action.

All individuals are responsible for complying with this Policy.

Managers and Supervisors must:

- Lead by example
- Promote inclusive behaviours within their teams
- Address inappropriate conduct promptly
- Escalate concerns where necessary

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

This Policy supports compliance with the Equality Act 2010 and related employment legislation.

Nano Fibre UK will ensure that:

- Legal obligations are understood and applied
- Risks relating to discrimination and unfair treatment are managed
- Appropriate action is taken where breaches occur

3. SCOPE

This Policy applies to all individuals working for or on behalf of Nano Fibre UK and establishes the requirements for equality, diversity, and inclusion across all business activities, working environments, and interactions.

The Policy defines the standards of behaviour, decision-making, and conduct expected in order to ensure compliance with the Equality Act 2010 and to promote a fair and inclusive workplace.

This Policy applies to:

- All employees, regardless of role, seniority, or employment status
- Job applicants and candidates throughout the recruitment process
- Contractors, agency workers, and temporary staff
- Consultants, suppliers, and third parties acting on behalf of the Company

All individuals within scope are required to comply with this Policy when engaging in any activity connected to Nano Fibre UK.

This Policy applies to all employment-related activities, including:

- Recruitment, selection, and onboarding processes
- Terms and conditions of employment
- Training, development, and promotion opportunities
- Performance management and disciplinary procedures
- Pay, benefits, and reward structures
- Redundancy and termination processes

All decisions must be fair, consistent, and based on objective, job-related criteria.

This Policy applies across all working environments, including:

- Company offices and premises
- Customer sites and field-based operations
- Vehicles and mobile working environments
- Remote and home working locations
- Digital platforms and communication tools (e.g. email, Teams, messaging systems)

The standards set out in this Policy apply regardless of location or working arrangement.

This Policy applies to behaviour:

- During working hours and while carrying out Company duties
- At work-related events, meetings, and training sessions
- When representing the Company externally
- Outside of working hours where behaviour may impact colleagues, customers, or the Company

Behaviour outside of work may still be subject to this Policy where it:

- Affects working relationships
- Creates a hostile or uncomfortable working environment
- Damages the reputation of the Company

This Policy applies to all interactions with:

- Customers
- Members of the public
- Suppliers and external partners

Employees must ensure that:

- All individuals are treated fairly and respectfully
- No discriminatory or inappropriate behaviour is demonstrated
- The Company's standards are upheld at all times

All individuals within scope must:

- Understand and comply with this Policy
- Apply its principles in their day-to-day activities
- Take responsibility for their behaviour and conduct

Managers and Supervisors must ensure that:

- This Policy is applied consistently within their teams
- Any concerns or breaches are addressed promptly
- Appropriate action is taken where non-compliance is identified

There are no exceptions to this Policy based on role, seniority, location, or working arrangement.

This Policy applies equally to all individuals and situations where there is a connection to Nano Fibre UK.

4. DEFINITIONS / ABBREVIATIONS

Term	Definition
Equality	Ensuring all individuals are treated fairly and consistently, with equal access to opportunities, resources, and outcomes. Equality does not mean treating everyone the same, but ensuring decisions are justified, fair, and free from discrimination.
Diversity	The presence of differences between individuals, including characteristics such as age, disability, race, religion or belief, sex, and other personal or social factors. Diversity is recognised as a strength that supports innovation and performance.
Inclusion	Creating an environment where all individuals feel respected, valued, and able to contribute fully without fear of discrimination or exclusion. Inclusion requires active effort and is demonstrated through behaviour and decision-making.
Protected Characteristics	Characteristics protected under the Equality Act 2010, including: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
Direct Discrimination	Treating an individual less favourably because of a protected characteristic. Example: refusing a promotion based on gender or race.
Indirect Discrimination	A provision, criterion, or practice that applies to everyone but disadvantages individuals with a protected characteristic and cannot be objectively justified.
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes verbal, non-verbal, physical, and digital behaviour. Impact is more important than intent.
Bullying	Offensive, intimidating, malicious, or insulting behaviour that undermines or humiliates an individual. Bullying does not need to relate to a protected characteristic but is still unacceptable.
Victimisation	Treating an individual unfairly because they have raised a concern, made a complaint, or supported another person in doing so. This is unlawful under the Equality Act 2010.
Reasonable Adjustments	Changes made to remove or reduce disadvantages experienced by individuals with disabilities. This may include adjustments to duties, working hours, equipment, or environment. The Company has a legal duty to implement reasonable adjustments where required.
Unconscious Bias	Unintentional attitudes or assumptions that influence behaviour and decision-making. These must be actively recognised and managed to ensure fair outcomes.
Positive Action	Lawful steps taken to support underrepresented or disadvantaged groups to improve equality of opportunity. Must be proportionate, evidence-based, and must not result in unlawful discrimination.
IMS	The framework used by Nano Fibre UK to manage compliance, risk, quality, and operational processes across the business.

5. ROLES AND RESPONSIBILITIES

Role	Responsibilities
Senior Management	Senior Management will provide visible leadership and accountability for equality, diversity, and inclusion across the business. They must ensure that EDI is embedded into strategy, decision-making, and organisational culture. This includes allocating appropriate resources, setting expectations, and ensuring that risks relating to discrimination or unfair treatment are identified and managed. Senior Management must also ensure that appropriate action is taken where breaches of this Policy occur.
Policy Owner / HR	The Policy Owner (HR or nominated responsible function) will be responsible for maintaining this Policy and ensuring alignment with the Equality Act 2010 and best practice. They must provide guidance to managers and employees, oversee the handling of complaints, ensure fair and consistent application of procedures, and monitor trends relating to EDI risks. They are responsible for ensuring that appropriate investigations are conducted and that outcomes are documented and defensible.
Managers / Supervisors	Managers and Supervisors must apply this Policy consistently within their teams and lead by example. They are responsible for promoting inclusive behaviours, ensuring fair treatment in all decisions, and preventing discrimination, harassment, or exclusion. They must address inappropriate behaviour immediately, escalate concerns where necessary, and support employees who raise issues. Managers must ensure that decisions (e.g. recruitment, promotion, performance) are evidence-based, documented, and free from bias.
Employees	Employees must comply with this Policy at all times and contribute to a respectful and inclusive working environment. They must treat colleagues, customers, and third parties with dignity and respect, avoid behaviour that could be considered discriminatory or inappropriate, and take responsibility for their actions. Employees must report concerns, incidents, or inappropriate behaviour and must cooperate with any investigations.
All Individuals (Including Contractors & Third Parties)	Any individual working on behalf of Nano Fibre UK must adhere to the standards set out in this Policy. They must ensure that their behaviour aligns with Company expectations and does not expose the Company to legal or reputational risk. Failure to meet these standards may result in removal from work activities, termination of contracts, or further action as appropriate.

6. POLICY REQUIREMENTS

6.1. General Principles

Nano Fibre UK will ensure that equality, diversity, and inclusion principles are embedded into all aspects of business operations, decision-making, and workplace behaviour.

All individuals must be treated fairly, consistently, and with dignity and respect at all times. Equality and inclusion must not be treated as optional considerations, but as fundamental requirements of professional conduct.

Nano Fibre UK will ensure that:

- All individuals are treated fairly and without bias
- Decisions are based on objective, job-related criteria
- Policies and processes are applied consistently across all employees
- No individual is disadvantaged without lawful and justifiable reason

Managers must ensure that consistency is maintained across teams and that similar situations are handled in a comparable manner.

The Company will not tolerate:

- Direct or indirect discrimination
- Harassment or unwanted conduct
- Bullying or intimidation
- Victimisation

Any behaviour that breaches this standard will be taken seriously and addressed through formal procedures.

All individuals must understand that unacceptable behaviour, regardless of intent, may result in disciplinary action.

All employees must demonstrate inclusive and respectful behaviour in all interactions.

This includes:

- Treating others with dignity and professionalism
- Being mindful of language, tone, and conduct
- Avoiding behaviour that could reasonably be perceived as offensive or exclusionary
- Respecting differences in background, perspective, and experience

Behaviour will be assessed based on its impact, not solely on the intention behind it.

All individuals are personally responsible for their behaviour and must ensure that their actions align with this Policy.

Employees must:

- Take ownership of their conduct
- Challenge inappropriate behaviour where safe to do so
- Report concerns or breaches promptly

Managers must:

- Act as role models for inclusive behaviour
- Address issues immediately and appropriately
- Ensure compliance within their teams

Failure to take responsibility may be treated as a breach of this Policy.

Equality, diversity, and inclusion principles must be applied across all business activities, including:

- Recruitment and selection
- Performance management
- Training and development
- Operational decision-making
- Customer and third-party interactions

EDI considerations must be incorporated into everyday processes and must not be treated as a separate or isolated function.

Nano Fibre UK will take a proactive approach to promoting inclusion by:

- Identifying and addressing barriers to participation
- Encouraging open and respectful communication
- Supporting diverse perspectives and contributions
- Continuously reviewing practices to improve fairness and inclusivity

Inclusion must be actively demonstrated through behaviour, not assumed.

All activities must comply with the Equality Act 2010 and associated legislation.

Nano Fibre UK will ensure that:

- Legal obligations are understood and applied
- Risks relating to discrimination are identified and managed
- Appropriate action is taken where breaches occur

Failure to comply with legal requirements may result in disciplinary action and legal consequences.

6.2. Protected Characteristics

Nano Fibre UK will ensure that all individuals are protected from unlawful discrimination, harassment, and victimisation in relation to the protected characteristics defined under the Equality Act 2010.

These characteristics must be actively considered in all employment-related decisions and workplace interactions.

Protected characteristics are specific attributes defined by law under the Equality Act 2010. It is unlawful to treat an individual less favourably, or to disadvantage them, because of any of these characteristics.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

All individuals must ensure that their behaviour and decisions do not discriminate against others on the basis of these characteristics.

Protected characteristics must be considered across all aspects of employment and workplace conduct.

This includes:

- Recruitment and selection decisions
- Promotion and career development opportunities
- Allocation of work and responsibilities
- Performance management and disciplinary actions
- Access to training and benefits
- Day-to-day interactions and workplace behaviour

Managers must ensure that decisions are fair, objective, and free from bias related to any protected characteristic.

Unlawful conduct in relation to protected characteristics may include:

- **Direct discrimination** – treating someone less favourably because of a protected characteristic
- **Indirect discrimination** – applying a rule or practice that disadvantages a particular group
- **Harassment** – unwanted conduct that creates an offensive or hostile environment
- **Victimisation** – treating someone unfairly for raising or supporting a complaint

Such conduct is strictly prohibited and will be addressed through formal procedures.

Examples of behaviour that may breach this Policy include:

- Making assumptions about someone's ability based on age or gender
- Excluding individuals from opportunities due to cultural or religious factors
- Making inappropriate comments, jokes, or remarks about personal characteristics
- Failing to consider reasonable adjustments for disabled employees
- Treating someone differently because they have raised a complaint

These examples are not exhaustive. Behaviour will be assessed based on its impact.

All employees must:

- Be aware of protected characteristics and what they mean in practice
- Avoid behaviour or decisions that may disadvantage others
- Challenge or report inappropriate conduct where safe to do so

Managers must:

- Ensure that decisions are justified, documented, and free from bias
- Identify and address any practices that may disadvantage certain groups
- Promote awareness and understanding within their teams

Lack of awareness or intent will not be accepted as justification for discriminatory behaviour.

Where protected characteristics require specific consideration (e.g. disability, pregnancy, religion), Nano Fibre UK will:

- Assess individual circumstances
- Implement reasonable adjustments where required

- Ensure individuals are not disadvantaged

Decisions must be proportionate, justified, and documented.

6.3. Recruitment And Selection

Nano Fibre UK will ensure that all recruitment and selection processes are fair, transparent, and free from unlawful discrimination.

All hiring decisions must be based solely on objective, job-related criteria and must be applied consistently to all candidates.

- The Company will ensure that:
- Recruitment processes are structured and consistently applied
- Selection decisions are based on skills, experience, qualifications, and suitability for the role
- No candidate is treated less favourably due to a protected characteristic
- All stages of recruitment are conducted in a fair and unbiased manner

Managers must ensure that personal opinions, assumptions, or preferences do not influence recruitment decisions.

All job roles and advertisements must:

- Be clearly defined with objective and relevant criteria
- Avoid language that could discourage or exclude certain groups
- Focus on essential requirements rather than unnecessary criteria
- Be accessible to a wide and diverse audience where reasonably practicable

Job descriptions must reflect actual role requirements and must not include unjustified barriers to entry.

Shortlisting decisions must be:

- Based on pre-defined criteria aligned to the role
- Consistent across all applicants
- Supported by documented evidence

The following controls must be applied:

- Structured scoring systems must be used
- Interview notes must be retained
- Decisions must be capable of justification if challenged

Unstructured or informal selection processes must not be used.

Interviews must be conducted in a fair and consistent manner.

This includes:

- Asking the same or equivalent core questions to all candidates
- Avoiding inappropriate or discriminatory questions
- Ensuring candidates are assessed against the same criteria

- Providing a professional and respectful interview environment

Where possible:

- More than one interviewer should be involved
- Decisions should be reviewed to reduce bias

Nano Fibre UK will ensure that reasonable adjustments are made during the recruitment process where required.

This may include:

- Adjustments to interview formats
- Additional time for assessments
- Provision of accessible materials or support

Candidates must not be disadvantaged due to a disability or other relevant need.

Final hiring decisions must:

- Be evidence-based and aligned to the role requirements
- Be documented and capable of explanation
- Be free from bias, assumptions, or external influence

Managers must be able to demonstrate that the selected candidate was the most suitable based on objective criteria.

The following practices are strictly prohibited:

- Making decisions based on protected characteristics
- Asking inappropriate questions (e.g. about age, family plans, health unless relevant and lawful)
- Using informal or subjective criteria without justification
- Selecting candidates based on “fit” where this cannot be objectively defined

Any such behaviour may result in disciplinary action and potential legal consequences.

Recruitment decisions must be documented and retained in line with Company procedures.

Records must include:

- Job descriptions and criteria
- Shortlisting decisions
- Interview notes and scoring
- Final decision rationale

These records must be sufficient to demonstrate fairness, consistency, and legal compliance.

6.4. Training And Development

Nano Fibre UK will ensure that all employees have fair and equal access to training, development, and progression opportunities.

Training and development must be allocated based on business needs, role requirements, and individual capability, and must not be influenced by bias, assumptions, or protected characteristics.

The Company will ensure that:

- Training opportunities are communicated clearly and made accessible to all relevant employees
- Individuals are not excluded from development opportunities without valid and justifiable reason
- Decisions regarding training and progression are fair, consistent, and transparent

Managers must ensure that all team members are given appropriate opportunity to develop in line with their role and potential.

All decisions relating to training, development, and progression must be:

- Based on objective criteria (e.g. performance, role requirements, business need)
- Free from bias or personal preference
- Supported by documented reasoning where appropriate

Managers must avoid making assumptions about individuals' ambitions, capabilities, or availability.

Nano Fibre UK will support employee development by:

- Providing opportunities to build skills and knowledge
- Supporting career progression where appropriate
- Encouraging continuous learning and improvement

Progression decisions must be based on merit and suitability for the role, not informal judgments or subjective opinions.

Opportunities such as:

- Acting-up roles
- Project involvement
- Specialist tasks
- Overtime or additional responsibilities

must be allocated fairly and consistently.

Managers must ensure that:

- Opportunities are not repeatedly given to the same individuals without justification
- Decisions are not influenced by personal relationships or preferences
- All suitable employees are considered

Where required, Nano Fibre UK will make reasonable adjustments to support employees in accessing training and development.

This may include:

- Adjustments to training formats or delivery methods

- Additional support or resources
- Flexible arrangements where appropriate

Employees must not be disadvantaged in accessing development opportunities due to disability or other protected characteristics.

Training and development activities must be monitored to ensure fairness and consistency.

This includes:

- Reviewing participation across teams
- Identifying any patterns of exclusion or imbalance
- Addressing gaps or inequalities where identified

Managers must take corrective action where unfair practices or barriers are identified.

The following are not permitted:

- Excluding individuals from opportunities based on assumptions (e.g. availability, capability, personal circumstances)
- Providing opportunities based on favouritism or informal relationships
- Failing to consider all suitable candidates for development opportunities
- Making progression decisions without clear justification

Such behaviour may result in disciplinary action.

6.5. Workplace Behaviour and Inclusion

Nano Fibre UK will ensure that all workplace interactions are conducted in a professional, respectful, and inclusive manner.

All individuals are expected to contribute to a working environment where people feel safe, valued, and able to participate without fear of discrimination, exclusion, or inappropriate behaviour.

All employees must:

- Treat colleagues, customers, and third parties with dignity and respect
- Communicate in a professional and appropriate manner
- Be mindful of how their behaviour, language, and tone may affect others
- Demonstrate inclusive behaviour in all interactions

Behaviour must align with Company standards at all times, regardless of location or communication method.

Nano Fibre UK will promote an inclusive workplace by ensuring that:

- All individuals are given the opportunity to contribute and be heard
- Different perspectives are respected and considered
- No individual or group is excluded, marginalised, or overlooked
- Working environments support participation from all employees

Inclusion must be actively demonstrated through behaviour and decision-making.

The following behaviour is not acceptable and will not be tolerated:

- Discriminatory comments or actions
- Offensive, inappropriate, or derogatory language
- "Banter" that causes offence or discomfort
- Bullying, intimidation, or exclusion
- Microaggressions or repeated subtle behaviours that disadvantage others
- Any conduct that creates a hostile or uncomfortable environment

Behaviour will be assessed based on its impact, not solely the intention behind it.

This Policy applies to all forms of communication, including:

- Email
- Microsoft Teams or internal messaging platforms
- Phone calls and video meetings
- Social media where connected to work

Employees must ensure that:

- Messages are appropriate and professional
- Personal data or sensitive topics are handled respectfully
- Informal communication does not become inappropriate

Digital communication must meet the same standards as face-to-face interaction.

This Policy applies to behaviour outside of working hours where there is a connection to the workplace.

This includes:

- Work-related events and social gatherings
- Interactions between colleagues outside work
- Behaviour on social media that impacts colleagues or the Company

Behaviour may be addressed where it:

- Affects working relationships
- Creates a hostile or uncomfortable environment
- Damages the reputation of the Company

Employees are encouraged to:

- Challenge inappropriate behaviour where it is safe to do so
- Support colleagues who may be affected
- Report concerns through appropriate channels

Managers must:

- Address issues immediately
- Take all concerns seriously

- Ensure appropriate action is taken

Failure to act on known inappropriate behaviour may be treated as a breach of this Policy.

The following are strictly prohibited:

- Dismissing concerns as "banter" or "harmless"
- Ignoring or tolerating inappropriate behaviour
- Excluding individuals from conversations, activities, or opportunities
- Retaliating against individuals who raise concerns

Such behaviour may result in disciplinary action.

6.6. Reasonable Adjustments

Nano Fibre UK will ensure that reasonable adjustments are made to remove or reduce disadvantages experienced by individuals with disabilities or other relevant needs, in accordance with the Equality Act 2010.

The Company recognises its legal duty to take reasonable steps to ensure that individuals are not placed at a substantial disadvantage compared to others.

Nano Fibre UK will:

- Comply with its legal obligation to make reasonable adjustments
- Take a proactive approach to identifying and addressing barriers
- Ensure that individuals are supported to perform their roles effectively

Failure to make reasonable adjustments where required may constitute unlawful discrimination.

The need for adjustments may arise:

- Following disclosure by an employee or candidate
- Through medical or occupational health assessments
- Where a manager becomes aware of potential difficulties
- Through observation of barriers affecting performance or participation

Managers must not wait for formal requests where a need is reasonably apparent.

Adjustments may include, but are not limited to:

- Changes to working hours or patterns
- Adjustments to duties or responsibilities
- Provision of specialist equipment or software
- Modifications to the working environment
- Adjustments to training, assessments, or recruitment processes
- Additional support or supervision where appropriate

Adjustments must be tailored to the individual's needs and the specific circumstances.

All requests or identified needs for adjustments must be:

- Assessed on a case-by-case basis

- Considered in a fair and timely manner
- Based on evidence and, where appropriate, professional advice

When determining what is "reasonable," the Company will consider:

- The effectiveness of the adjustment in reducing disadvantage
- Practicality and feasibility
- Cost and available resources
- Impact on business operations

Decisions must be proportionate, justified, and documented.

Once agreed, adjustments must:

- Be implemented without unreasonable delay
- Be clearly communicated to the individual
- Be supported by managers and relevant teams

Failure to implement agreed adjustments may be treated as a breach of this Policy.

Reasonable adjustments must be reviewed periodically to ensure they remain effective.

This includes:

- Reviewing adjustments following changes in role or circumstances
- Monitoring effectiveness in practice
- Making further adjustments where required

Adjustments must not be treated as a one-off action but as an ongoing responsibility.

Information relating to an individual's condition or circumstances must be handled sensitively and in accordance with data protection requirements.

Only those who need to know should have access to relevant information.

Employees must:

- Inform the Company where they require support or adjustments
- Engage in discussions regarding their needs

Managers must:

- Take all requests seriously
- Act promptly and fairly
- Seek advice where required (e.g. HR or Occupational Health)
- Ensure adjustments are implemented and maintained

Failure to appropriately consider or implement reasonable adjustments may result in disciplinary action and legal consequences.

6.7. Fair Decision-Making and Unconscious Bias

Nano Fibre UK will ensure that all decisions affecting employees are fair, objective, and free from unlawful bias.

All decision-making must be based on evidence, role-related criteria, and business need, and must not be influenced by assumptions, stereotypes, or personal preferences.

All employment-related decisions must be:

- Based on objective, job-related criteria
- Consistent with Company policies and procedures
- Applied equally to all individuals in similar circumstances
- Supported by evidence and, where appropriate, documentation

Decisions must be capable of being clearly explained and justified if challenged.

Unconscious bias refers to unintentional attitudes or assumptions that influence judgement and behaviour.

Nano Fibre UK recognises that:

- Bias can affect decisions without individuals being aware
- Good intentions do not remove the impact of biased decisions
- Bias must be actively managed to ensure fairness

All employees, particularly those in decision-making roles, must remain aware of the potential for bias.

To reduce the impact of unconscious bias, the following controls must be applied:

- Use of structured processes (e.g. scoring criteria, standardised questions)
- Involvement of more than one decision-maker where appropriate
- Reviewing decisions for consistency and fairness
- Avoiding reliance on subjective judgments such as “gut feel” or “cultural fit”

Managers must actively challenge their own assumptions and decision-making patterns.

All decisions must be supported by relevant and appropriate evidence.

This includes:

- Performance data
- Skills and qualifications
- Experience and capability
- Documented behaviours and outcomes

Decisions must not be based on:

- Personal preference
- Informal opinions
- Assumptions about individuals’ personal circumstances

Managers must ensure that:

- Similar situations are handled in a consistent manner
- Decisions are aligned across teams where applicable
- Any differences in treatment can be justified and explained

Inconsistent decision-making may indicate bias and must be addressed.

Additional care must be taken in decisions with a higher risk of bias or impact, including:

- Recruitment and promotion
- Disciplinary actions
- Performance management outcomes
- Allocation of opportunities

For such decisions:

- Documentation must be thorough
- Decisions should be reviewed or validated where appropriate
- Rationale must be clearly recorded

The following are not permitted:

- Making assumptions based on protected characteristics
- Using subjective criteria without justification
- Selecting individuals based on personal preference or familiarity
- Relying on "gut feeling" without evidence
- Making decisions without documenting rationale

Such behaviour may result in disciplinary action.

Managers are responsible for ensuring that all decisions within their teams are fair, consistent, and compliant with this Policy.

The Company will:

- Monitor decision-making patterns where appropriate
- Review outcomes for fairness and consistency
- Take action where bias or unfair treatment is identified

Failure to demonstrate fair and objective decision-making may be treated as a breach of this Policy.

6.8. Positive Action

Nano Fibre UK may take lawful positive action to support individuals or groups who are underrepresented or disadvantaged, with the aim of improving equality of opportunity.

Positive action will be applied in accordance with the Equality Act 2010 and must always be proportionate, evidence-based, and justifiable.

Positive action may be used to:

- Address underrepresentation within the workforce
- Reduce disadvantage experienced by specific groups

- Encourage participation from individuals who may otherwise be less likely to apply or progress
- Promote fairness and inclusion across the organisation

Positive action is intended to level the playing field, not to guarantee outcomes.

Under the Equality Act 2010, positive action is lawful where it is used to:

- Encourage applications from underrepresented groups
- Provide targeted development or support
- Address specific disadvantages

However, positive action must not result in:

- Automatic selection or promotion based solely on a protected characteristic
- Unfair disadvantage to other individuals
- Decisions that are not based on merit where merit can be determined

Positive action must only be applied where:

- There is evidence of underrepresentation or disadvantage
- The action is proportionate to the identified issue
- The approach is appropriate and necessary
- The impact on other individuals is considered

All positive action measures must be capable of justification if challenged.

Positive action may include:

- Targeted outreach or recruitment initiatives
- Additional training or development opportunities
- Mentoring or support programmes
- Encouraging applications from underrepresented groups

These measures must be designed to support access to opportunities, not to bypass fair selection processes.

In recruitment and promotion:

- All candidates must be assessed based on merit and suitability
- Positive action may only be applied in limited circumstances where candidates are equally qualified
- Decisions must not be made solely on the basis of a protected characteristic

Managers must ensure that selection decisions remain fair, objective, and evidence-based.

All positive action measures must be:

- Clearly defined and approved where required
- Supported by evidence (e.g. workforce data, identified gaps)
- Documented and capable of explanation

Managers must be able to demonstrate that:

- The action taken was lawful
- It was proportionate
- It was applied appropriately

Positive action initiatives must be monitored to ensure they:

- Achieve their intended objectives
- Do not create unintended disadvantages
- Remain lawful and proportionate

Where necessary, adjustments must be made or initiatives withdrawn.

The following are not permitted:

- Selecting or promoting individuals solely based on a protected characteristic
- Applying blanket policies that favour one group over others
- Implementing measures without evidence or justification
- Using positive action as a substitute for fair decision-making

Such practices may result in unlawful discrimination and disciplinary action.

6.9. Reporting Concerns

Nano Fibre UK will ensure that all concerns relating to equality, diversity, and inclusion are reported, taken seriously, and addressed promptly and appropriately.

All individuals must feel able to raise concerns without fear of being ignored, dismissed, or treated unfairly.

Concerns must not be handled informally where they involve potential breaches of this Policy.

Nano Fibre UK will ensure that all concerns relating to equality, diversity, and inclusion are reported, taken seriously, and addressed promptly and appropriately.

All individuals must feel able to raise concerns without fear of being ignored, dismissed, or treated unfairly.

Concerns must not be handled informally where they involve potential breaches of this Policy.

Concerns must be reported:

- As soon as reasonably practicable after the issue is identified
- Even where the individual is unsure whether the behaviour constitutes a breach
- Where behaviour is observed affecting others, not just themselves

Delays in reporting may impact the ability to investigate and resolve issues effectively.

Concerns may be reported through the following channels:

- Line Manager or Supervisor
- HR / Policy Owner

- Senior Management (where appropriate)

Where an individual does not feel comfortable reporting through their direct manager, they must escalate the concern to an alternative appropriate contact.

All reports must be treated confidentially and handled sensitively.

In some cases, concerns may be addressed informally where appropriate and agreed by the individual raising the concern.

This may include:

- Raising the issue directly with the individual involved
- Manager-led discussions to address behaviour
- Clarification or awareness of expectations

Informal resolution must only be used where:

- The issue is minor in nature
- There is no ongoing risk
- The individual raising the concern is comfortable with this approach

Serious concerns must be escalated through formal processes.

Managers must:

- Take all concerns seriously, regardless of perceived severity
- Act promptly and appropriately
- Maintain confidentiality
- Escalate concerns where required
- Avoid dismissing or minimising issues

Managers must not attempt to resolve serious concerns informally where formal action is required.

All reported concerns must be:

- Recorded where appropriate
- Managed in line with Company procedures
- Retained securely and confidentially

Records must include:

- Details of the concern
- Actions taken
- Outcomes

Documentation must be sufficient to demonstrate that concerns have been handled appropriately.

The following are not permitted:

- Ignoring or failing to report concerns
- Discouraging individuals from raising issues

- Attempting to resolve serious concerns informally to avoid escalation
- Dismissing concerns as "minor" without proper consideration
- Retaliating against individuals who raise concerns

Such behaviour may result in disciplinary action.

6.10. Investigation and Outcomes

Nano Fibre UK will ensure that all reported concerns relating to equality, diversity, and inclusion are investigated promptly, fairly, and consistently.

Investigations must be conducted in a manner that is impartial, proportionate, and aligned with Company procedures, ensuring that all parties are treated with respect and that outcomes are based on evidence.

All investigations must be:

- **Impartial** – free from bias or conflicts of interest
- **Confidential** – information shared only where necessary
- **Timely** – conducted without unnecessary delay
- **Proportionate** – appropriate to the severity and complexity of the issue
- **Evidence-based** – based on facts, not assumptions

Individuals involved in the investigation must be treated fairly and given the opportunity to provide their account.

An investigation must be initiated where:

- A formal complaint has been raised
- A serious concern has been identified
- Informal resolution is not appropriate or has failed
- There is a potential breach of this Policy

Managers must escalate concerns to HR or the appropriate responsible function where formal investigation is required.

The investigation process may include:

- Gathering relevant information and evidence
- Interviewing individuals involved or witnesses
- Reviewing documentation, communications, or records
- Assessing behaviour against Company policies and standards

Investigations must be conducted in line with Company procedures and must be documented appropriately.

Following investigation, outcomes may include:

- **No further action** – where no breach is identified
- **Informal resolution** – where appropriate for minor issues
- **Management action** – such as guidance, training, or behavioural expectations

- **Formal disciplinary action** – in line with Company procedures
- **Process or control improvements** – where systemic issues are identified

All outcomes must be proportionate, justified, and based on evidence.

Where appropriate, outcomes will be communicated to relevant parties, taking into account confidentiality and data protection requirements.

The individual who raised the concern will be informed that the matter has been addressed, although specific details may not always be shared.

All investigations must be:

- Documented accurately and in full
- Stored securely and confidentially
- Retained in line with Company procedures

Records must include:

- Details of the concern
- Evidence gathered
- Actions taken
- Outcome and rationale

These records must be sufficient to demonstrate that the investigation was conducted fairly and appropriately.

The Company will ensure that:

- Similar cases are handled consistently
- Outcomes are aligned with Company standards and procedures
- Decisions are reviewed where necessary

Inconsistent or unjustified outcomes must be addressed.

The following are not permitted:

- Ignoring or failing to investigate concerns
- Conducting biased or incomplete investigations
- Failing to document findings or decisions
- Applying inconsistent or unjustified outcomes
- Attempting to resolve serious issues informally to avoid escalation

Such behaviour may result in disciplinary action.

6.11. Protection from Victimisation

Nano Fibre UK will ensure that all individuals are protected from victimisation when raising concerns, making complaints, or participating in processes related to equality, diversity, and inclusion.

The Company recognises that individuals must feel safe and supported in order to report concerns and engage with investigations without fear of negative consequences.

Victimisation is unlawful under the Equality Act 2010 and will not be tolerated.

Victimisation occurs where an individual is treated unfavourably because they have:

- Raised a concern or complaint under this Policy
- Supported another individual in raising a concern
- Provided evidence or participated in an investigation
- Challenged behaviour they reasonably believe to be inappropriate

This protection applies regardless of whether the original concern is upheld.

Nano Fibre UK will ensure that individuals are not:

- Subjected to negative treatment or disadvantage
- Excluded from opportunities or activities
- Treated unfairly in decisions relating to performance, development, or progression
- Subject to hostility, intimidation, or retaliation

All individuals must be able to raise concerns without fear of repercussions.

Managers must:

- Ensure that individuals who raise concerns are treated fairly and respectfully
- Monitor for any signs of victimisation within their teams
- Take immediate action where victimisation is suspected
- Escalate concerns appropriately

Managers must not allow subtle or indirect victimisation to occur.

Victimisation may not always be obvious and may include:

- Changes in behaviour or treatment following a complaint
- Exclusion from meetings, communications, or opportunities
- Unjustified negative performance feedback
- Withdrawal of support or cooperation
- Hostile or dismissive attitudes

All concerns must be assessed based on behaviour and impact.

Any suspected victimisation must be reported immediately in line with Section 6.9.

Reports will be:

- Taken seriously
- Investigated promptly and fairly
- Addressed through appropriate action

Failure to report known victimisation may be treated as a breach of this Policy.

Where victimisation is identified:

- Appropriate action will be taken in line with Company procedures

- This may include formal disciplinary action
- Additional support will be provided to affected individuals where required

Victimisation is considered a serious breach of this Policy.

While all concerns will be treated seriously, knowingly false or malicious allegations may result in disciplinary action.

This provision must not be used to discourage individuals from raising genuine concerns.

7. LEGAL, REGULATORY AND IMS ALIGNMENT

Nano Fibre UK will ensure that equality, diversity, and inclusion requirements are managed in line with applicable legal, regulatory, and organisational standards.

EDI will be treated as a core compliance and risk management area and will be integrated into the Company's governance, operational processes, and Integrated Management System (IMS).

Failure to comply with EDI requirements may result in legal, financial, and reputational consequences.

Nano Fibre UK will comply with all applicable legislation relating to equality, employment, and fair treatment, including:

- Equality Act 2010
  Governing discrimination, harassment, victimisation, and the duty to make reasonable adjustments.
- Employment Rights Act 1996
  Supporting fair treatment in employment practices and protection against unfair dismissal.
- Human Rights Act 1998
  Protecting fundamental rights such as dignity, fairness, and respect.
- Health and Safety at Work etc. Act 1974
  Including the duty to protect employees from harm, including psychological harm arising from bullying or harassment.

The Company will ensure that:

- All employment practices comply with legal requirements
- Decisions are capable of justification under law
- Risks relating to discrimination or unfair treatment are identified and managed

Appropriate action is taken where breaches occur.

Nano Fibre UK will maintain appropriate governance structures to support EDI compliance.

This includes:

- Clearly defined roles and responsibilities (Section 5)
- Oversight by HR / Policy Owner and Senior Management
- Integration with risk management and compliance frameworks
- Maintenance of appropriate records and documentation

EDI risks must be:

- Identified and assessed where relevant
- Escalated where necessary
- Managed in line with Company procedures

This Policy forms part of the Nano Fibre UK Integrated Management System (IMS) and must be applied consistently across all business processes.

EDI considerations must be integrated into:

- Recruitment and onboarding processes
- Performance management and disciplinary procedures
- Training and development frameworks
- Incident, complaint, and grievance handling
- Risk assessments and audits
- Supplier and contractor management

EDI must not operate in isolation and must align with wider business systems and controls.

ISO Alignment: This Policy supports compliance with the following ISO standards

- **ISO 9001:** This policy supports fair, consistent, and transparent people management practices, improving organisational effectiveness and employee engagement.
  It enables identification of issues and supports corrective actions and continuous improvement in workplace culture and processes.
- **ISO 14001:** This policy supports responsible organisational behaviour by ensuring that environmental responsibilities are applied fairly and consistently across the workforce.
  It contributes to maintaining compliance and ethical standards in environmental practices.
- **ISO 45001:** This policy supports employee wellbeing by promoting a safe, inclusive, and respectful working environment.
  It helps reduce risks related to stress, harassment, and poor workplace culture.
- **ISO/IEC 27001:** This policy supports the protection of personal and sensitive employee data, particularly where diversity or complaint-related information is processed.
  It ensures that such data is handled securely and in line with information security requirements.

Failure to comply with this Policy may result in:

- Breaches of the Equality Act 2010
- Employment tribunal claims (e.g. discrimination, harassment, victimisation)
- Financial penalties or compensation awards
- Reputational damage
- Reduced employee engagement and retention

Nano Fibre UK will take all reasonably practicable steps to:

- Prevent EDI-related risks
- Identify issues early

- Implement corrective actions where required

8. MONITORING, COMPLIANCE AND ENFORCEMENT

Nano Fibre UK will monitor the effectiveness of this Policy to ensure that equality, diversity, and inclusion principles are applied consistently and that risks are identified, managed, and addressed.

Monitoring activities will be structured, evidence-based, and aligned with the Company's Integrated Management System (IMS).

The Company will carry out monitoring activities to assess compliance and identify areas for improvement.

These activities may include:

- **Review of complaints, grievances, and incidents**
  Analysing trends relating to discrimination, harassment, or workplace behaviour.
- **Recruitment and progression monitoring**
  Assessing whether outcomes are fair and consistent across different groups.
- **Training and development analysis**
  Reviewing access to opportunities and identifying potential imbalances.
- **Disciplinary and performance outcomes**
  Ensuring consistency and fairness in decision-making.
- **Employee feedback and engagement data**
  Identifying concerns relating to inclusion, fairness, or workplace culture.

Monitoring must be used to identify patterns, risks, and areas requiring action.

EDI compliance will be subject to internal audit and assurance activities as part of the IMS.

Audits may include:

- Review of compliance with this Policy
- Assessment of recruitment, promotion, and decision-making practices
- Verification of investigation records and outcomes
- Review of training records and awareness activities

Audit findings must be:

- Documented and communicated
- Classified where appropriate (e.g. non-conformities, observations)
- Addressed through corrective actions

Managers and Supervisors are responsible for ensuring compliance within their teams.

They must:

- Monitor behaviour and decision-making
- Identify and address risks or concerns
- Ensure policies are applied consistently

- Escalate issues where required

Failure to manage EDI risks may be treated as a breach of responsibility.

Where monitoring or audits identify issues, Nano Fibre UK will implement appropriate corrective actions.

This may include:

- Changes to processes or procedures
- Additional training or awareness activities
- Review of decision-making practices
- Updates to policies or controls

All corrective actions must be:

- Proportionate to the identified risk
- Implemented without undue delay
- Tracked through to completion
- Reviewed to ensure effectiveness

All employees must comply with this Policy and apply its principles in their day-to-day work.

Employees must:

- Follow expected standards of behaviour
- Apply fair and inclusive practices
- Report concerns or breaches
- Cooperate with investigations and monitoring activities

Failure to comply may result in disciplinary action.

Nano Fibre UK will enforce compliance through appropriate management and disciplinary processes.

Enforcement actions may include:

- Investigation of breaches or non-compliance
- Formal disciplinary action
- Additional training or supervision
- Restriction of responsibilities where appropriate

Serious or repeated breaches may result in dismissal or termination of contract.

9. REPORTING AND ESCALATION

Nano Fibre UK will ensure that all concerns, risks, incidents, and breaches relating to equality, diversity, and inclusion are reported promptly and escalated appropriately.

EDI-related issues must be treated as operational and compliance risks and must not be ignored, delayed, or managed informally where formal action is required.

All individuals must report any issue that may impact equality, diversity, or inclusion, including:

- Discrimination (direct or indirect)
- Harassment, bullying, or inappropriate behaviour
- Victimisation or retaliation
- Unfair or biased decision-making
- Breaches of this Policy or related procedures
- Systemic issues or patterns of concern within teams or processes

Issues must be reported whether they affect the individual directly or are observed affecting others.

Concerns must be reported through appropriate internal channels, including:

- Line Manager or Supervisor
- HR / Policy Owner
- Senior Management (where appropriate)

Where an individual is unable or unwilling to report through their direct manager, they must escalate the concern to an alternative appropriate contact.

The Company will ensure that reporting channels are accessible, clearly communicated, and capable of handling concerns appropriately.

Where an issue presents an immediate risk:

- Action must be taken to prevent further harm where possible
- The issue must be escalated without delay
- Managers must intervene where required

Delays in escalation may increase risk and impact.

All reported issues must be assessed and escalated based on severity, risk, and potential impact.

Managers must:

- Take all reports seriously
- Escalate concerns where formal investigation is required
- Avoid resolving serious issues informally

The Policy Owner / HR must:

- Assess risk and determine appropriate action
- Initiate investigations where required
- Ensure compliance with Company procedures

Serious or high-risk concerns must be escalated to Senior Management.

All reported concerns must be recorded and tracked where appropriate.

Records must include:

- Details of the concern

- Actions taken
- Investigation outcomes
- Any corrective actions

Records must be:

- Accurate and complete
- Stored securely and confidentially
- Available for audit and review

Tracking must ensure that issues are not left unresolved.

All reports will be handled:

- Confidentially and sensitively
- In line with data protection requirements
- With appropriate safeguards to protect individuals involved

Individuals raising concerns must be protected from victimisation (see Section 6.11).

Failure to report or escalate known issues may result in:

- Increased risk to individuals and the organisation
- Escalation of issues that could have been addressed earlier
- Disciplinary action where appropriate

Managers who fail to escalate serious concerns may be considered in breach of their responsibilities.

10. TRAINING, AWARENESS AND COMMUNICATION

All employees and individuals working on behalf of Nano Fibre UK must complete appropriate EDI training relevant to their role.

Training will include:

- **Induction Training**
  Covering key principles of equality, diversity, and inclusion, expected behaviours, and Policy requirements.
- **Role-Specific Training**
  For individuals with management or decision-making responsibilities, including:
  - Recruitment and selection
  - Performance management
  - Handling complaints and investigations
- **Refresher Training**
  Delivered periodically to reinforce understanding and address emerging risks or issues.
- **Targeted Training**
  Provided where monitoring, incidents, or audits identify gaps in knowledge or behaviour.

Nano Fibre UK will promote ongoing awareness of EDI principles through regular communication and engagement activities.

This may include:

- Internal briefings and updates
- Toolbox talks and team discussions
- Awareness campaigns (e.g. respectful behaviour, inclusion)
- Policy updates and guidance materials

Communication will focus on practical application and real-world scenarios to support understanding.

Employees must:

- Complete all required training
- Apply training in their day-to-day work
- Demonstrate inclusive and respectful behaviour
- Remain aware of their responsibilities under this Policy
- Report concerns or issues where identified

Failure to complete training or apply learning may result in disciplinary action.

Managers and Supervisors must:

- Ensure all team members complete required training
- Reinforce EDI expectations within their teams
- Monitor behaviour and address issues promptly
- Identify and address knowledge gaps
- Ensure training is applied in practice

Managers must not assume that completion of training equates to understanding or compliance.

11. REVIEW AND CONTROL

Nano Fibre UK will ensure that this Policy is formally reviewed, maintained, and controlled to confirm its continued suitability, effectiveness, and alignment with legal, regulatory, and operational requirements.

This Policy must remain reflective of how the business operates and must evolve in response to changes in risk, legislation, and organisational activity.

This Policy will be formally reviewed:

- At least annually
- As part of Management Review processes
- Following significant organisational or operational changes

Regular review ensures that the Policy remains relevant, accurate, and effective.

In addition to scheduled reviews, this Policy must be reviewed where necessary, including:

- Following complaints, grievances, or incidents relating to EDI
- Following investigation outcomes identifying systemic issues
- Following audit findings or non-conformities

- Where monitoring identifies trends, risks, or weaknesses
- Following changes to legislation or regulatory guidance
- Following the introduction of new processes, systems, or working practices

The Policy must be updated where gaps or improvements are identified.

The effectiveness of this Policy will be assessed through:

- Analysis of complaints, incidents, and investigation outcomes
- Monitoring of recruitment, development, and decision-making practices
- Review of training completion and awareness levels
- Internal audit findings and IMS assurance activities
- Employee feedback and engagement data

Findings must be used to identify areas for improvement and inform corrective actions.

Where weaknesses, risks, or non-compliance are identified:

- Corrective actions must be implemented without undue delay
- Processes, controls, or procedures must be reviewed and updated
- Additional training or awareness activities must be delivered where required

All actions must be:

- Proportionate to the identified risk
- Clearly defined and documented
- Tracked through to completion
- Reviewed to ensure effectiveness

This Policy is controlled under the Nano Fibre UK Integrated Management System (IMS) and is subject to document control requirements.

This includes:

- Version control and revision history
- Formal approval and authorisation
- Controlled distribution to relevant personnel
- Retention of previous versions in line with Company procedures

Only the most current version of this Policy must be used.

The Policy Owner is responsible for:

- Ensuring this Policy remains current, accurate, and effective
- Coordinating reviews and updates
- Ensuring changes are communicated across the business
- Maintaining alignment with legal and ISO requirements

Managers must ensure that:

- The Policy is applied consistently within their teams

- Updates are communicated and understood
- Compliance is maintained

All employees must ensure they are working in accordance with the current version of this Policy.

12. APPROVALS

Name and Surname:	Designation:	Role in Document	Signature:	Date:
Callum Krzysik	Head of ISO Compliance	Approver		20/11/2026
Ashley Woodcock	Process Manager	Approver		25/11/2026
Lisa Woods	Head of HR	Policy Owner		19/11/2026

13. REFERENCE TO RELATED DOCUMENT

ID	Title of Document

14. CHANGE RECORD

Date	Information
21-10-2026	Added **Information Classification: INTERNAL** to the document footer.
16-11-2026	Changed the document classification in the footer from INTERNAL to PUBLIC.