DOCUMENT 09 - EQUALITY & DIVERSITY POLICY

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1. Purpose

This policy sets out Spotlight Multimedia Group Ltd (“Spotlight”) commitment to treating people fairly, respectfully and with dignity.

Spotlight is committed to providing an environment where individuals are treated fairly and where discrimination, harassment, bullying and unfair treatment are not tolerated.

The purpose of this policy is to promote equality, respect and inclusion across Spotlight's activities and working relationships.

2. Scope

This policy applies to employees, freelancers, contractors and other individuals working for or on behalf of Spotlight.

It also applies to Spotlight's professional interactions with clients, performers, event organisers, venue staff, members of the public and other individuals involved in Company activities.

3. Equality and Fair Treatment

Spotlight will aim to ensure that individuals are treated fairly and are given appropriate and reasonable opportunities within Spotlight's activities.

Decisions relating to recruitment, work opportunities, responsibilities, treatment and professional relationships should be based on relevant

factors such as skills, experience, suitability, conduct and the requirements of the work.

Spotlight will not tolerate unfair treatment based on characteristics protected by law.

4. Diversity and Inclusion

Spotlight recognises that people have different backgrounds, experiences, abilities, perspectives and circumstances.

Spotlight aims to maintain an environment where differences are respected and individuals can participate in Company activities without unnecessary barriers or exclusion.

Everyone working for or on behalf of Spotlight is expected to treat others with professionalism, courtesy and respect.

5. Discrimination

Discrimination will not be tolerated within Spotlight's activities or working relationships.

This includes direct or indirect discrimination, unfair treatment, exclusion or other inappropriate behaviour relating to a protected characteristic or other circumstance protected by applicable law.

Individuals should not make decisions about another person based on assumptions or stereotypes relating to their personal characteristics.

6. Harassment and Bullying

Spotlight will not tolerate harassment, bullying, intimidation or other behaviour that creates a hostile, humiliating, threatening or otherwise inappropriate environment.

This includes verbal, physical, written, online or other forms of inappropriate behaviour.

Unwanted comments, jokes, messages, images or conduct that could reasonably cause offence, humiliation or distress may be treated as inappropriate even where the individual responsible did not intend to cause harm.

7. Recruitment and Work Opportunities

Where Spotlight recruits employees, freelancers or contractors, reasonable steps will be taken to ensure that selection decisions are based on relevant skills, experience, suitability and the requirements of the role.

Spotlight will not deliberately exclude an individual from an opportunity because of a protected characteristic or other irrelevant personal factor.

8. Reasonable Adjustments

Where appropriate, Spotlight will consider reasonable adjustments that may assist an individual in carrying out their role or participating in Company activities.

Individuals are encouraged to raise relevant requirements with Spotlight so that reasonable options can be considered.

Spotlight will consider requests on an individual basis, taking account of the circumstances and practical requirements of the work.

9. Events, Venues and Client Activities

When working at events, performances, venues or client premises, individuals working for Spotlight are expected to maintain the same standards of equality, respect and professional conduct.

Spotlight will cooperate with reasonable equality and inclusion requirements established by clients, venues or event organisers.

Where Spotlight becomes aware of serious discriminatory, harassing or inappropriate behaviour connected with its activities, the matter may be raised with the appropriate responsible person or organisation.

10. Photography and Creative Work

Spotlight recognises the importance of treating individuals fairly and respectfully when carrying out photography, videography and other creative work.

Images, footage and other creative material should be produced and handled professionally and should not deliberately portray an individual in a discriminatory, degrading or intentionally humiliating manner.

Where clients provide specific requirements relating to individuals, these should be considered alongside Spotlight's professional and legal responsibilities.

11. Responsibilities of Individuals

Everyone working for or on behalf of Spotlight has a responsibility to:

- Treat others with dignity and respect.
- Avoid discriminatory, harassing or bullying behaviour.
- Avoid making inappropriate assumptions or comments about other individuals.
- Follow reasonable Company requirements relating to equality and inclusion.
- Raise serious concerns where they believe discrimination, harassment or bullying has occurred.

12. Raising Concerns

Anyone who believes they have experienced or witnessed discrimination, harassment, bullying or other serious inappropriate behaviour should raise the concern with a director or other appropriate responsible person.

Concerns will be treated seriously and considered appropriately.

Where a concern involves serious wrongdoing or another matter covered by Spotlight's **Document 02 - In-House Whistleblowing Policy**, that policy may also apply.

13. Confidentiality

Spotlight will handle equality and diversity concerns sensitively and will respect confidentiality wherever reasonably possible.

Information may need to be shared where necessary to investigate a concern, protect an individual, comply with a legal obligation or take appropriate action.

Spotlight cannot guarantee complete confidentiality where disclosure is necessary or legally required.

14. Protection from Retaliation

Spotlight will not tolerate retaliation against an individual who raises a genuine concern about discrimination, harassment, bullying or other inappropriate behaviour.

Individuals should not be treated unfairly, threatened, intimidated or disadvantaged because they have raised a genuine concern or participated appropriately in the consideration of a concern.

Deliberately making a false or malicious allegation is not protected by this policy and may result in appropriate action.

15. Professional Responsibility

Everyone working for or on behalf of Spotlight is expected to maintain appropriate professional standards when communicating with colleagues, clients, performers, suppliers, venue staff and members of the public.

Spotlight expects individuals to consider how their behaviour, language and actions may affect others and to act respectfully and professionally.

17. Policy Acknowledgement

All individuals working for or on behalf of Spotlight Multimedia Group Ltd are expected to understand and comply with this policy and to contribute towards a professional, respectful and inclusive working environment.

Spotlight is committed to promoting equality, respecting diversity and addressing discrimination, harassment and bullying appropriately.