Equality, Diversity & Inclusion Policy

1. Our Commitment

Subcontext is committed to equality of opportunity, and to a workplace where everyone is treated with dignity and respect. We comply with the Equality Act 2010.

We believe a team with different backgrounds and perspectives builds better products, particularly when those products talk to members of the public. As a small and growing company, we want to set fair habits from the start so they scale as we grow.

2. Scope

This policy covers recruitment, pay, training, promotion, working conditions and the end of employment, for employees, contractors and job applicants.

It also covers how we treat customers, suppliers and visitors, and how we design the platform.

3. Definitions

Term	Meaning
Direct discrimination	Treating someone less favourably because of a protected characteristic
Indirect discrimination	Applying a rule or practice that puts people with a protected characteristic at a disadvantage, without a good reason
Harassment	Unwanted conduct related to a protected characteristic, or of a sexual nature, that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment
Victimisation	Treating someone badly because they have made or supported a complaint of discrimination
Reasonable adjustment	A change to how work is done, or to the workplace or equipment, that removes a disadvantage for a disabled person

4. No Discrimination

We do not discriminate on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

These are the protected characteristics under the Equality Act 2010. We also aim to treat people fairly regardless of background, caring responsibilities or other personal circumstances. Direct and indirect discrimination, harassment and victimisation are all prohibited.

5. In Practice

- Recruitment and promotion decisions are based on skills, experience and potential
- Reasonable adjustments are made for disabled colleagues and applicants
- Flexible working requests are considered fairly
- Harassment and bullying are not tolerated, and complaints are investigated promptly

In recruitment, we:

1. Write job descriptions around the skills the role actually needs
2. Advertise roles in ways that reach a range of candidates
3. Ask every applicant whether they need any adjustments to take part in the process
4. Use consistent questions and criteria for every candidate for a role
5. Record the reasons for hiring decisions

People are paid fairly for the work they do, and pay decisions are based on the role, skills and contribution, not on any protected characteristic.

Worked example

A candidate with dyslexia asks for extra time on a written exercise. We agree, and assess their work against the same criteria as everyone else. Later, as a colleague, they ask for screen-reading software. We provide it as a reasonable adjustment.

6. Our Products

We design the platform to treat our customers' customers fairly, including people who may be vulnerable, in line with our AI Ethics & Responsible Use Policy.

The platform includes vulnerability detection, conduct rules for vulnerable customers and Consumer Duty, and escalation to a human, which help our customers support people who need extra care. We consider accessibility and fair outcomes when we design new features.

7. Roles and Responsibilities

Who	Responsibilities
Directors	Own this policy, make sure recruitment and people decisions follow it, and handle complaints
Everyone	Treats colleagues, customers and others with dignity and respect, and speaks up about unfair treatment

8. Raising Concerns

Anyone who feels they have been treated unfairly can raise it with a director, or under the Whistleblowing Policy.

Complaints are handled confidentially and investigated promptly by a director who is not involved. Nobody will be victimised for raising a complaint in good faith or for supporting someone else's.

9. Breaches

Discrimination, harassment, bullying or victimisation may lead to disciplinary action, including dismissal, or to termination of a contract.

10. Review

This policy is reviewed at least annually.

As the team grows, the review will also consider whether our recruitment, pay and promotion practices are producing fair outcomes.

11. Related Documents

- AI Ethics & Responsible Use Policy
- Whistleblowing Policy
- Conflicts of Interest Policy

12. Document Control

Item	Detail
Owner	A director of Subcontext Ltd
Approved by	The directors
Review	At least annually
Effective	October 2026

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