Title:	DEI Policy	**Classification:**	Confidential
Revision date:	22/09/2026	**Doc. Id:**	DEI
Status:	Released	**Revision:**	V2

DIVERSITY, EQUITY AND INCLUSION POLICY

This Policy was originally issued on 16/10/2024. This version (Revision V2) was amended on 22/09/2026 to add Section 3 *(Gender Balance Objectives and Action Plan).*

1 COOLBROOK COMMITMENTS

1.1 Coolbrook is committed to promoting equal opportunities in employment and creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. At Coolbrook we are passionate about building teams where unique perspectives and backgrounds are valued and where everyone feels equally included. Coolbrook employees and any job applicants will receive equal treatment regardless of age, disability, gender, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, sex or sexual orientation, religion or belief and political or trade union activity (referred to as Protected Characteristics in this policy). Coolbrook is also committed to providing equitable treatment to all those we deal with as an organisation, including customers and suppliers. While each country will have its own applicable legislation, this policy describes the business principles that we will operate under as part of our zero tolerance approach to discrimination in any form.

2 ABOUT THIS POLICY

2.1 This policy sets out our approach to diversity, equity and inclusion. Coolbrook aims to encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination in our workplace. It applies to all aspects of employment with the company, including recruitment, pay, benefits and conditions, flexible working and leaves, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

2.2 This policy applies to all employees, consultants, contractors, volunteers, interns, casual workers and agency workers.

2.3 The Management Team is responsible for this policy and will review it on a regular basis.

2.4 This policy does not form part of any contract of employment or other contract to provide services, and the company may amend it at any time.

3 GENDER BALANCE OBJECTIVES AND ACTION PLAN

3.1 Coolbrook recognises that its workforce, in particular in engineering and other technical roles, is not yet representative of a gender-balanced organisation. This section sets out concrete objectives, actions and governance to progress gender balance across the organisation, in addition to the equal treatment principles set out in Section 1.

3.2 Coolbrook will establish and maintain baseline data on the gender composition of (i) the workforce as a whole, (ii) engineering and other technical roles, (iii) management and leadership positions, and (iv) the applicant pool for open positions. As of September 2026, women make up 14.0% of the total workforce (6 of 43 employees), 6.7% of engineering roles (2 of 30), and 12.5% of management (1 of 8). Coolbrook does not currently track the

gender composition of its applicant pools and will begin doing so as part of this action plan. This data will be reviewed by the Management Team on a semi-annual basis.

3.3 Coolbrook will monitor the gender composition of its applicant pools, in particular for engineering and leadership roles, and take active steps under Section **3.4** to broaden and diversify these pools. Recruitment, promotion and succession decisions will continue to be made strictly on the basis of merit, competence and suitability for the role, consistent with the merit-based principles set out elsewhere in this policy, and no numerical hiring or promotion target overrides this principle. Progress in applicant pool diversity and in the measures taken will be reviewed at least annually and reported to the Management Team.

3.4 In support of these objectives, Coolbrook will take the following concrete measures:

3.4.1 **Inclusive job advertisements:** for each vacancy, the responsible manager will review the job advertisement and job description to remove gendered language and any unnecessary requirements that could discourage applicants of any gender from applying.

3.4.2 **Broader recruitment channels:** recruitment channels for technical roles will be actively broadened to reach as wide and diverse a pool of applicants as practicable, including seeking out relevant organisations or networks to partner with where suitable ones can be identified.

3.4.3 **Diverse interview panels:** shortlisting and interview panels for technical and leadership roles will include more than one person and, where feasible, a gender-diverse panel.

3.4.4 **Equal parental leave:** parental leave arrangements will be available on equal terms regardless of gender, and take-up by all employees will be actively encouraged.

3.4.5 **Flexible working:** flexible working arrangements will be available to support employees with caring responsibilities.

3.4.6 **Mentoring:** given Coolbrook's size, a formal mentoring programme is not currently planned; managers are encouraged to provide informal mentoring and support to aid the development and retention of women within the organisation.

3.4.7 **Manager responsibility:** managers are responsible for applying inclusive recruitment and promotion practices, in line with the policy described in Section 4**.**

3.5 The Management Team will be responsible for overseeing this section and reporting progress against the objectives and measures in this section on an annual basis.

3.6 This section will be reviewed and updated at least annually, or sooner if required by changes in applicable law or Coolbrook's growth.

4 DIVERSITY AND INCLUSION RESPONSIBILITIES

4.1 Managers are responsible for being familiar with this policy and for recognising and avoiding discrimination, harassment and victimisation, and for promoting equality of opportunity and diversity in the recruitment, development and promotion decisions they

make. The Management Team has overall responsibility for keeping employees up to date on expectations and unacceptable behavior.

4.2 Coolbrook will make this policy and the Anti-harassment and Bullying Policy available to all employees as part of onboarding, and employees will be required to confirm that they have read, understood and will comply with them.

4.3 Coolbrook employees must not discriminate against or harass other people, including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace and outside the workplace when dealing with customers, suppliers or other work-related contacts and on work-related trips or events including social events.

5 PROHIBITED FORMS OF DISCRIMINATION

5.1 The following forms of discrimination are prohibited under this policy and are unlawful:

5.1.1 **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.

5.1.2 **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect employees with childcare or other caring commitments. Such a requirement would be discriminatory unless it can be justified.

5.1.3 **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

5.1.4 **Victimisation:** treating someone less favourably who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has made the complaint.

5.1.5 **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

6 RECRUITMENT AND SELECTION

6.1 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, Coolbrook aims to take steps to improve the diversity of the workforce and provide equality of opportunity, including as set out in Section 3. Shortlisting and interviewing candidates will be done by more than one person where

possible. Coolbrook recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.

6.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

6.3 Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

6.4 Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

6.5 Right to work checks will be undertaken in line with the country-specific requirements in which the role holder will be based. The company is required by law to ensure that all employees are entitled to work in the location where the role is based. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport or work permit) before employment starts, to satisfy current immigration legislation of the destination country.

7 DISABILITIES

7.1 If an employee is disabled or becomes disabled, it is encouraged to tell the employer about the condition so that the company can consider what reasonable adjustments or support may be appropriate.

8 PART-TIME AND FIXED-TERM WORK

8.1 Part-time and fixed-term employees should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

9 BREACHES OF THIS POLICY

9.1 Coolbrook takes a strict approach to breaches of this policy, which will be dealt with in accordance with country-specific practices. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

9.2 If you believe that you have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, you can raise the matter using the procedure set out in our Anti-harassment and Bullying Policy or via the company's Raise a Concern channel by sending an email to raiseaconcern@coolbrook.com where appropriate. Complaints will be treated in confidence and investigated as appropriate.

9.3 There must be no victimisation against staff who complain about or report discrimination. If you believe you have been victimised for making a complaint or report of discrimination,

or have witnessed it happening to someone else in the workplace, you should raise this with the Management Team or through the company's Raise a Concern mechanism or raising a concern via applicable country-specific procedures.

9.4 We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that diversity, equity and inclusion principles are adhered to in the workplace. However, making a false allegation in bad faith, or that you know to be untrue, will be treated as misconduct and dealt with under disciplinary procedures.