

NERACLEAR LTD

Document Title	NEURO-INCLUSION POLICY
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REVIEW RECORD

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1 PURPOSE

The purpose of this policy is to establish the commitment of Neraclear (the Company) to creating and maintaining a neuro-inclusive workplace.

The Company recognises neurodiversity as the natural variation in how people think, learn, process information and experience the world. People may have different strengths, needs and experiences, including people with the same type of neurodivergence.

The Company aims to identify and reduce unnecessary barriers within the workplace and create an environment in which colleagues can contribute effectively without being expected to work, communicate or process information in the same way.

This policy establishes the principles that apply across the Company. Detailed requirements and procedures relating to specific areas of work are contained within the relevant Company documents referenced in this policy.

2 SCOPE

This policy applies to employees and other people working for or on behalf of the Company.

The Company's responsibilities and the arrangements that apply may vary according to an individual's employment or contractual relationship with the Company.

This policy relates specifically to neuro-inclusion. Mental health and neurodivergence are distinct, although an individual may experience both and there may be areas of overlap. Requirements relating specifically to mental health and wellbeing are provided in the Mental Health and Wellbeing Policy (POL-003).

Where a colleague experiences a workplace barrier or requires changes or support relating to their work, the Flexible Working and Other Workplace

Support (INT-003) document applies, regardless of whether the need relates to neurodivergence, mental health or another circumstance.

3 DEFINITIONS

Term/Abbreviation	Description
Colleague	A person working for or on behalf of the Company, including employees and, where applicable, contractors or other workers. The use of this term does not imply employment status.
Neurodivergent	A term used to describe someone whose brain works differently from what is considered more typical. Neurodivergence includes, but is not limited to, ADHD, autism, dyslexia and dyspraxia.
Neurodiversity	The natural variation in how people's brains behave and process information.
Neuro-inclusion	The active inclusion of neurodivergent people within the workplace, including identifying and reducing unnecessary barriers that may prevent people from accessing, participating in or contributing effectively to work.

4 POLICY REQUIREMENTS

4.1 Our Commitment

The Company is committed to developing a workplace in which different ways of thinking, communicating, learning and working are recognised and respected.

The Company shall seek to:

- identify and reduce unnecessary workplace barriers;
- provide clear and accessible information and processes;
- consider how working practices may affect people differently;
- enable colleagues to raise barriers or support needs without requiring them to identify a particular solution;
- provide access to appropriate workplace support;
- consider individual circumstances rather than making assumptions based on a diagnosis or type of neurodivergence; and
- continue to review and improve its approach to neuro-inclusion.

Neuro-inclusion is a Company-wide responsibility and shall be considered when developing or reviewing workplace practices, processes and documentation.

4.2 Legal Responsibilities

The Company shall comply with its responsibilities under the Equality Act 2010 and other applicable employment legislation.

Neurodivergence may amount to a disability under the Equality Act 2010. Where the legal definition of disability is met, the individual has the protections provided by the Act, including the right to reasonable adjustments.

The Company recognises that not every neurodivergent person identifies as disabled and that an individual does not need a formal diagnosis for the Equality Act definition of disability to apply.

4.3 Accessing Workplace Support

Colleagues do not need to have a diagnosis or disclose that they are neurodivergent to raise a workplace barrier or ask for support.

Where a colleague identifies a barrier, difficulty or change relating to their work, they may use the Company's workplace support process whether they know what support they require or are unsure what may help.

Requirements and procedures for requesting, considering, agreeing and reviewing workplace support are provided in:

- **Flexible Working and Other Workplace Support** (INT-003)

This document includes flexible working, workplace adjustments, workplace needs assessments, Occupational Health, Access to Work and other appropriate workplace support.

4.4 Sharing Information About Neurodivergence

Colleagues are not required to tell the Company that they are neurodivergent.

Where a colleague chooses to share information about their neurodivergence, the information shall be treated sensitively and appropriately.

Information shall only be shared where there is an appropriate reason to do so and in accordance with applicable Company requirements relating to confidentiality and data protection.

A colleague who does not wish to disclose neurodivergence may still raise workplace barriers and seek appropriate support.

4.5 Recruitment and Onboarding

The Company shall seek to identify and reduce unnecessary barriers within recruitment and onboarding.

Recruitment and selection shall focus on the requirements of the role and shall not rely unnecessarily on communication style, social behaviour or other characteristics that are not relevant to the person's ability to carry out the role.

Applicants shall be provided with information about how to request reasonable adjustments during recruitment and shall not be required to have a diagnosis to request support.

Detailed requirements for inclusive recruitment and onboarding are provided in:

- **Recruitment and Onboarding** (INT-004)

4.6 Communication and Information

Company information and communication shall be designed, where reasonably practicable, to be clear, accessible and easy to navigate.

The Company shall consider whether the way information is communicated creates unnecessary barriers, including ambiguity about what is required, where information can be found, who is responsible or what happens next.

Detailed requirements and guidance are provided in:

- **Internal Communications** (STD-002)
- **Document Management** (INT-001)

4.7 Ways of Working

The Company recognises that people may work most effectively in different ways and that working environments, arrangements, systems and processes can create different barriers for different people.

Managers shall focus on what a role or task genuinely requires and consider appropriate flexibility and support where a workplace barrier is identified.

Flexible working, workplace adjustments and other workplace support shall be managed in accordance with:

- **Flexible Working and Other Workplace Support** (INT-003)

4.8 Management and Awareness

Managers shall be supported to understand their responsibilities in creating a neuro-inclusive workplace and responding appropriately when a colleague identifies a workplace barrier or support need.

The Company shall provide appropriate information, awareness activities, guidance or training to support the implementation of this policy.

Managers shall not make assumptions about an individual's abilities, difficulties or support needs based solely on a known or suspected neurodivergence.

4.9 Performance, Conduct and Capability

Performance, conduct and capability shall be considered fairly and in accordance with the relevant Company procedures.

Before progressing a concern through a formal procedure, consideration shall be given to whether an unidentified or unresolved workplace barrier or support need may be relevant and whether appropriate support or reasonable adjustments are required.

Reasonable adjustments shall also be considered in relation to the formal procedure itself where appropriate.

Detailed requirements are provided in:

- **Performance and Capability** (INT-005)
- **Disciplinary and Grievance** (INT-006)

4.10 Raising Concerns

A colleague who is experiencing a workplace barrier, requires support or has concerns about how this policy is being applied may raise the matter through the appropriate Company route.

Where the matter relates to workplace support, colleagues should refer to:

- **Flexible Working and Other Workplace Support** (INT-003)

Concerns relating to discrimination, harassment, bullying or other inappropriate treatment shall be raised in accordance with:

- **Equality, Diversity and Inclusion Policy** (POL-001)
- **Disciplinary and Grievance** (INT-006)

4.11 Responsibilities

- **The Company** is responsible for providing the organisational framework, resources and governance required to support neuro-inclusion.
- **HR** is responsible for maintaining this policy, providing advice and support, and coordinating relevant Company activities relating to neuro-inclusion.
- **Managers** are responsible for applying this policy within their areas of responsibility, considering workplace barriers and seeking appropriate support or advice where required.

- **All colleagues** are expected to contribute to a respectful and inclusive working environment and to follow the requirements of this policy and other relevant Company documents.

5 MONITORING AND REVIEW

HR shall monitor the implementation of this policy and consider feedback, identified barriers and relevant organisational or legal developments when determining whether changes are required.

The policy shall be formally reviewed at the interval stated in the document control information or earlier where a significant change makes review necessary, in accordance with Document Management (INT-001).

6 REFERENCES

Document Title	Document Number/Source
Equality, Diversity and Inclusion Policy	POL-001
Mental Health and Wellbeing Policy	POL-003
Flexible Working and Other Workplace Support	INT-003
Recruitment and Onboarding	INT-004
Internal Communications	STD-002
Document Management	INT-001
Performance and Capability	INT-005
Disciplinary and Grievance	INT-006
Acas – Neurodiversity at work	www.acas.org.uk