Equal Opportunities and Diversity Policy

The Directors of Shaftesbury Capital PLC recognise the benefits that diversity can bring both to the Board and across the Company. The merits of diversity are recognised both in this Employee Diversity policy and in the Board Diversity policy.

1. Policy Statement

1.1 Shaftesbury Capital is committed to promoting equality of opportunity for all our employees and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

1.2 We do not discriminate against our employees on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

1.3 The principles of non-discrimination and equality of opportunity also apply to the way in which our employees treat visitors, clients, customers, suppliers and former employees.

1.4 All employees have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Your attention is drawn to our separate Anti-harassment and bullying policy.

1.5 This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Who is covered by the policy?

This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, trainees, homeworkers, part-time and fixed-term employees, interns, casual workers and agency staff. There is a separate policy dealing with issues of discrimination and harassment which applies specifically to third party consultants, contractors and suppliers.

3. Forms of discrimination

3.1 Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

3.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above.

3.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage.

3.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that 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.

3.5 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported

someone else's complaint.

4. Recruitment and selection

4.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Shortlisting of applicants should be done by more than one person wherever possible.

4.2 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. They should include an appropriate short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.

4.3 Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with Human Resources approval. For example:

a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
c) Permitted positive action to recruit disabled persons.
d) Equal opportunities monitoring (which will not form part of the decision-making process).

4.4 Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of Human Resources (who should first consider whether such matters are relevant and may lawfully be taken into account).

4.5 We are required by law to ensure that all employees are entitled to work in the UK. 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) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the UK Border Agency.

4.6 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

5. Employee training and promotion and conditions of service

5.1 Employee training needs will be identified through regular performance conversations. All employees will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

5.2 Our conditions of service, benefits and facilities are available to all employees who should have access to them and there should be no unlawful obstacles to accessing them.

6. Termination of employment

6.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

6.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

7. Disability discrimination

7.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

7.2 If you experience difficulties at work because of your disability, you may wish to contact Human Resources to discuss any reasonable adjustments that would help overcome or minimise the difficulty. HR may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

7.3 We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

8. Breaches of this policy

8.1 If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment Policy. If you are uncertain which applies or need advice on how to proceed you should speak to Human Resources.

8.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

8.3 Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.