

EQUALITY AND DIVERSITY POLICY

PURPOSE

Why do we have this policy?

Advent Capital (Holdings) Ltd (“Advent”) is committed to promoting equality in the workplace and ensure fairness in the manner in which decisions are carried out.

We aim to create and sustain a supportive working environment which is:

- Free from unlawful discrimination
- All our staff are equally valued and respected
- Decisions about people are based on individuals’ abilities, skills, performance and behaviour together with our business requirements.

ELIGIBILITY

Who does this policy cover?

This policy applies to the Board of Directors, Senior Managers and all other workers and contractors., Advent expects that everyone respects the Company policy and acts accordingly. Any acts that breach the policy will be taken seriously, be properly investigated and may be subject to the Company’s disciplinary procedures.

POLICY

Definitions

Protected characteristics is a term introduced in the Equality Act 2010. These nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality and Human Rights Commission (EHRC) has published further information about the definition of protected characteristics, which can be found at: <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>

Equality is ensuring individuals or groups of individuals are not treated differently or less favorably, and that all forms of discrimination and harassment are eliminated.

Diversity means accepting each person as an individual irrespective of differences used to differentiate groups. These can be along the dimensions of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (“Protected Characteristics”)

Unlawful Discrimination

It is unlawful to discriminate directly or indirectly in the field of recruitment or employment because of the protected characteristics.

It is also unlawful to discriminate directly or indirectly, or harass customers or clients, in the provision of goods and services (the nature of our business) because of the protected characteristics.

Direct discrimination is less favourable treatment of a person compared with another person because of a protected characteristic. A simple example of this could be if an employee was passed over for

promotion purely on the grounds that they had been diagnosed with the condition of multiple sclerosis. This example would be directly discriminatory because of the protected characteristic of disability.

Indirect discrimination is when the use of an apparently neutral practice, provision or criterion puts people with a particular protected characteristic at a disadvantage compared with others who do not share that characteristic, and that the application of that practice, provision or criterion cannot be objectively justified. An example of this could be if the age range of 20 to 40 was stated as being preferred in a job advertisement. This example would be indirectly discriminatory because of the protected characteristic of sex; because this age range would proportionately disadvantage women during usual child bearing years. This example could also be directly discriminatory because of the protected characteristic of age.

The Equality Act 2010 also formally introduced two concepts which had previously been established in case law but not in primary legislation. These concepts are “associative discrimination” and “perceptive discrimination”.

Associative discrimination is where a victim of discrimination does not have a protected characteristic but is discriminated against because of their association with someone who does e.g. the parent of a disabled child.

Perceptive discrimination is where someone is discriminated against in the belief that someone has a protected characteristic, whether or not they do have it. In other words, treating someone less favourably because of a protected characteristic is still unlawful even if it transpires that the victim of that treatment does not have that protected characteristic.

Victimisation is subjecting a person to a detriment because they have carried out a “protected act” or there is a belief that they have carried out a protected act i.e. bringing proceedings under the Equality Act 2010; giving evidence or information in connection with such proceedings; doing any other thing for the purposes or in connection with the Equality Act 2010 including making an allegation that a person has contravened that legislation. An example of a detriment could be if someone is denied a training opportunity or promotion because s/he made or supported a complaint or raised a grievance under the Equality Act 2010 or because s/he is suspected of doing so, or being about to do so.

Failure to make reasonable adjustments for individuals with disabilities - Where a disabled person is at a substantial disadvantage in comparison with people who are not disabled, there is a duty to take reasonable steps to remove that disadvantage by (i) changing provisions, criteria or practices, (ii) altering, removing or providing a reasonable alternative means of avoiding physical features and (iii) providing auxiliary aids.

Instructing, causing or inducing unlawful discrimination is also strictly prohibited.

PROCEDURE

At Advent, equality and diversity are embedded into our everyday values and guiding principles as we:

- Promote collaboration and teamwork
- Ensure all employees have equal opportunities for learning and development
- Listen, engage and respond to feedback from our employees.

In addition, we recognise the importance of extending diversity and inclusion to our business practices.

Monitoring

The Company will regularly monitor and review the policy to ensure its continuing effectiveness in the workplace. Ann Roberts, Head of Hr & Office Services, is responsible for the effective operation of this policy.

Recruitment, selection, promotion and training procedures will be reviewed regularly to ensure that we are delivering on our policy.

Recruitment

Advent encourages job applications from all candidates and will endeavour via its Recruitment Policy to employ a workforce that reflects the diverse community at large.

No job applicant or employee will receive less favourable treatment on the grounds of one or more of the protected characteristics.

No job applicant or employee will be disadvantaged by any conditions or requirements that cannot be shown to be justifiable. The Company will provide clear and justifiable job and progression criteria, which are demonstrably objective and job-related.

The Company will not use pre-employment health screening, questionnaires or questioning for any job position.

Recruitment and selection criteria and all procedures relating to the assessment of employees or potential employees will be regularly reviewed to ensure they are non-discriminatory. We aim to ensure that the most competent job applicants are recruited and that the most able employees progress within their careers.

The Company will be flexible making reasonable adjustments for the provision of environment/interview conditions.

Board Appointments

The Company recognises the importance and value in a diverse board composition which helps in improving the effectiveness of the board and enabling it to run the business more prudently. A board should provide effective challenge across the full range of the business activities and have the capacity to explore key business issues rigorously. One of the ways that challenge at the board can be encouraged and be more robust is to have sufficient diversity of approach, skills and experience so that complex and technical issues can be probed and discussed. The Company will take these factors into account, together with all other aspects of this policy, when considering board appointments.

Benefits and conditions of employment

The Company will provide the same opportunities for everyone. No member of the workforce will be treated less favourably on the grounds of one or more of the protected characteristics.

The Company will communicate and make available opportunities for promotion and training to all employees on a fair and equal basis.

The Company will ensure that employment conditions and job requirements reflect its commitment to equal opportunities.

Flexibility/reasonable adjustments

The Company will provide reasonable adjustments to the workplace or environment for disabled employees as appropriate.

In addition, where appropriate and reasonable, the Company will provide flexibility in terms of working arrangements where cultural, religion, belief or family needs conflict with work requirements.

Third parties

The Company will endeavour to communicate its commitment to equal opportunities to its customers, clients and suppliers and take care to ensure, as far as reasonably practicable, that its employees' are not subject to discrimination by third parties.

What to do if problems occur?

All of Advent's employees have the right to a working environment free from unlawful discrimination and/or harassment and/or victimisation. Any person who believes that he or she has received less favourable treatment on the grounds of one or more of the protected characteristics should in the first instance try to resolve the problem informally by telling the individual concerned that they find their behaviour offensive and asking them to stop it. If an employee finds it difficult or embarrassing to ask the person to stop, they may want a colleague to be present and take notes of this conversation.

If the offensive behaviour persists, the employee should speak to HR who will advise the employee of the appropriate channels for recourse including the Company's grievance procedure or the bullying and harassment policy.

The Company will treat any such complaints with the utmost seriousness and discretion and a full investigation will be conducted. Staff who have raised a grievance relating to a case of discrimination, or who have provided information about such discrimination will not be victimised as a result.

Disciplinary

Any employee who discriminates against a colleague on the grounds of one or more of the protected characteristics will be subject to the Company's disciplinary procedure. This will be treated seriously and may be subject to disciplinary sanctions up to and including gross misconduct and could result in the termination of employment. For more information see the Disciplinary and Grievance Procedure.