

Equality, Diversity and Inclusion Policy

Orchard Street Investment Management LLP and Orchard Street Investment Advisers Limited (together "Orchard Street") is committed to encouraging equality, diversity and inclusion for all employees, workers, and job applicants, and eliminating unlawful discrimination.

Our aim is to create a genuinely inclusive workplace where diversity is recognised as a strength and where all partners and staff can develop, succeed and reach their highest potential regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation (together the Equality Act 2010 protected characteristics) and social background.

In the course of our business, Orchard Street is also committed to prevent unlawful discrimination of clients or the public.

We understand that discrimination may occur in the following forms:

- 1 **Direct discrimination** - this is treating someone less favourably (or, in the case of pregnancy and maternity, unfavourably) because of a protected characteristic. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic, e.g because a worker is the primary carer for a disabled child.
- 2 **Indirect discrimination** - this is treating a group of people in the same way, but in a way which adversely affects those with a protected characteristic.
- 3 **Victimisation** - this is treating someone less favourably because they have alleged discrimination or asserted their right not to be discriminated against because of a protected characteristic.
- 4 **Harassment** - this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity.

Orchard Street commits to:

- Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense;
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued. This commitment includes ongoing training for partners, senior management and other staff about their rights and responsibilities under this Policy. Responsibilities include staff conducting themselves to help Orchard Street provide equal opportunities in employment and prevent bullying, harassment, victimisation and unlawful discrimination.

- All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment, against fellow employees, clients, suppliers and the public.
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, clients, suppliers, visitors, the public and any others in the course of Orchard Street's business activities. Such acts will be dealt with as misconduct under Orchard Street's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice. Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.
- Make opportunities for ongoing training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of Orchard Street.
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.

Details of Orchard Street's grievance and disciplinary policies and procedures can be obtained from the partner in charge of HR. This includes with whom an employee should raise a grievance.

Use of Orchard Street's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

Orchard Street's Equality, Diversity and Inclusion Policy

- Provide equality, fairness and respect for all personnel, whether temporary, part-time or full-time;
- Not unlawfully discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation (together the Equality Act 2010 protected characteristics) and social background; and
- Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, bonus arrangements, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

This Policy is fully supported by Orchard Street Partners and senior management.

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