



**Colchester**<sup>®</sup>  
GLOBAL INVESTORS

# Equal Opportunities and Diversity Policy

August 2023



## Equal Opportunities and Diversity Policy

This policy sets out Colchester Global Investors ("Colchester") approach to equal opportunities and diversity.

Colchester is built on our core values which form the foundations of our culture and support everything we do. Being an inclusive employer with a diverse workforce is a fundamental part of how we operate as an organisation. We are committed to encouraging and achieving a working environment which is underpinned by fairness to all individuals, where equality and diversity are recognised, encouraged, and valued and the concept of individual responsibility is accepted by all.

This policy sets out Colchester's approach to equality, diversity and inclusion and allows us to have a clear and effective means of addressing concerns relating to equal opportunity matters. The policy applies to all aspects of employment, including, but not limited to, recruitment, pay and conditions, training and development opportunities, appraisals, promotion, conduct at work, disciplinary and grievance procedures, termination of employment and providing references.

### Policy Statement

Colchester is committed to ensuring that we have effective policies, strategies, procedures and processes and that we encourage behaviour which promotes equality, encourages diversity and contributes to an inclusive organisational culture. All employees and any job applicants will receive equal treatment regardless of age, disability, gender, gender reassignment, marital or civil partner status, sexual orientation, pregnancy or maternity, having or not having dependents, race, colour, nationality, ethnic or national origin, religion or belief, work pattern or any other irrelevant grounds.

Colchester does not tolerate intimidation, bullying, harassment, or discrimination in any form under any circumstances. Individuals who make allegations in good faith will not be victimised or treated less favourably by Colchester as a result of taking proper and legitimate action against discrimination or harassment.

Selection for employment, promotion, training, development, or any other benefit is on the basis of merit, skills, qualifications, ability and aptitude alone. All employees are aided and encouraged to develop and fulfil their potential and decisions in this regard are made on fair and objective criteria, free from discrimination.

### Aims of this policy

The aims of this policy are to ensure that:

- all staff work in an open, equal opportunities environment that is free from unlawful discrimination, including harassment and victimisation;
- all staff are treated equally and fairly within each aspect and at each stage of their employment, and have the opportunity to achieve their full potential;
- all employees have a clear understanding of their rights and responsibilities under the policy. If anyone is in any doubt about what constitutes acceptable and unacceptable conduct under this policy, they should contact their manager or HR;
- in order to ensure that Colchester has access to the widest pool of talent and secures the best workers for its needs, employment opportunities are open to all suitably qualified candidates.
- Colchester employs/engages an ability-based workforce that reflects the multi-cultural nature of its' local communities and labour markets;

- Colchester will effectively deal with unlawful discrimination where it is discovered; and
- individuals who make complaints under this policy in good faith will not be victimised or treated less favourably as a result.

## Types of discrimination

There are various forms of discrimination and to varying degrees. Discrimination, whether direct or indirect, is a barrier to equality, diversity and inclusion. Discrimination occurs when decisions are made, (whether consciously or not), that favour certain groups or individuals and therefore disadvantage others, because of a particular characteristic they have no control over. How one individual perceives behaviour can be very different to how another colleague may perceive it.

A general description of some of the different types of discriminatory acts that may be unlawful is set out below. Some of the actions referred to below can be intentional and others unintentional:

**1) Direct Discrimination** – occurs where a person is treated less favourably than another person was treated, or would have been treated, in like for like circumstances, because of a protected characteristic they have. For example, refusing to promote a pregnant employee on the basis that she is shortly due to go on maternity leave.

**Associative Discrimination** – this is direct discrimination against someone because they associate with another person who possesses a protected characteristic. For example, an employee is discriminated against because their child is disabled.

**Perceptive Discrimination** – this is direct discrimination against an individual because others believe or make assumptions that they possess a particular protected characteristic. For example, where an employee is directly discriminated against because their co-workers believe the individual is gay. It applies even if the employee does not actually possess that characteristic.

**2) Indirect Discrimination** – occurs where a practice, provision or criteria applied to all staff has the effect, despite on the face of it being a neutral practice, of disadvantaging a certain group of people who share a particular protected characteristic, and it cannot be justified. For example, asking all employees to work on a Saturday or a Sunday could indirectly discriminate against those employees with certain religious beliefs who cannot work on these days.

**Harassment** – occurs where an individual is subjected to unwanted conduct, which may violate that person's dignity or create an intimidating, hostile, degrading, humiliating or otherwise offensive environment for that person.

For example, it can include unwanted behaviour such as name calling, teasing and making lewd comments, ignoring or excluding colleagues, displaying pornographic material in the workplace and making repeated, unwanted insensitive jokes. Harassment is dealt with under Colchester's Bullying and Harassment Policy.

Employees can complain of behaviour they find offensive even if it is not directed at them.

**Victimisation** – occurs where an individual suffers a detriment because they complained about or supported someone else's complaint about discrimination or harassment.

**Bullying** – offensive, malicious or insulting behaviour and abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

**Lawful Practices** – whilst it is Colchester's aim to act within the boundaries of the equal opportunities legislation at all times, the law provides exceptions for certain practices and acts that may appear to be contrary to the aims of this policy, but which, for example, may be justified by objective and operational means. If an employee has any concerns in respect of any workplace behaviour that they suspect may be contrary to this policy, the employee should contact their manager and/or HR.

## Duties and responsibilities

Those working at a managerial level can have a significant impact on the effective implementation of this policy and are expected to lead by example. Colchester requires all managerial staff to act in accordance with both the spirit and the letter of this policy at all times, and to ensure that appropriate standards of behaviour are maintained amongst the teams that they manage.

The success of this policy can only be achieved with the co-operation of all employees. The law and the existence of this policy cannot by themselves prevent discrimination. It is therefore crucial that each employee takes personal responsibility in applying this policy to the workplace, play their full part in adhering to it and help create an atmosphere of equality across the organisation including treating all fellow workers, visitors, clients, customers, suppliers and other business contacts with dignity and respect.

Employees should avoid any behaviour that could be discriminatory or be considered as harassment. If an employee becomes aware of any actual or potential breach of this policy, they should report it immediately to their manager and/or HR so that appropriate action can be taken by the Company.

All employees should ensure that where relevant, external contacts such as clients, suppliers and visitors to Colchester are aware of this policy and their obligations to work and operate within its parameters as appropriate. Employees should speak to their manager immediately if they engage in conduct that is unacceptable in accordance with the terms of this policy.

All employees are encouraged to participate in furthering this policy. If an employee requires further information or has any ideas to contribute, they should contact their manager and/or HR.

## When does this policy apply?

The policy applies to all conduct in the workplace and includes conduct outside of the workplace that is related to work such as meetings, social events and social interactions with colleagues. The policy also applies to conduct that may impact Colchester's reputation such as the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to Colchester.

Below are some specific areas of application:

### 1) Recruitment

Equality is an important part of our recruitment and selection processes and practices. Selection for employment at Colchester will be on the basis of merit, ability and aptitude, against objective criteria that avoid discrimination.

Job advertisements, whether internal or external must not indicate or appear to indicate an intention to discriminate. Job applicants must not be asked questions that might suggest an intention to discriminate because of a protected characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

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 to accommodate a disability are needed for an interview.

## 2) Training

Employees may be required to participate in training and development activities from time to time, to encourage the promotion of the principles of this policy.

## 3) Promotion

All promotion decisions will be made on the basis of merit and will not be influenced by any of the protected characteristics outlined in this policy. Promotion opportunities will be monitored to ensure equality of opportunity.

## 4) Equality and Pay

Colchester believes in equal pay for equal work, neither our remuneration policy nor our compensation programmes discriminate on the basis of any particular characteristic. Our approach to compensation is built on the principle of "fair pay for performance". All compensation decisions are reviewed with a diversity lens to ensure personal characteristics are irrelevant when it comes to compensation outcomes.

## Breaches of this policy and enforcement

If an employee believes that they have not been given equal treatment, they should raise the matter immediately with their manager and/or HR in the first instance. Where the employee wants to take formal action, Colchester's formal Grievance Procedure should be followed.

Any complaints or allegations regarding potential breaches of this policy will be treated very seriously and in confidence. Complaints may be investigated by Colchester to the extent that it considers appropriate.

While Colchester welcomes complaints relating to breaches of this policy made in good faith, any false complaints or complaints in bad faith will be viewed as an act of misconduct. This will normally result in disciplinary action being taken by the Company against the employee concerned.

If an employee discriminates, harasses or induces others to do so they may be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct, and may result in dismissal without notice or payment in lieu of notice. Colchester takes breaches of this policy seriously.

## Monitoring

In order to maintain equal opportunities best practice and identify barriers to workforce equality and diversity, information relating to equal opportunities matters and the make-up of the workforce may be recorded and analysed by Colchester. We may use anonymised statistics and data to monitor and review the composition and movement of workers and its provisions, practices, criteria, policies and procedures taken in respect of such matters.

The information obtained from equal opportunities, diversity and ethnicity monitoring is held in strict confidence and used to ensure our processes are fair, transparent, promote equality of opportunity for all and/or for compliance with applicable procedures, laws and regulations. Employee personal data may be provided to Clients and potential clients in response to

Requests for Information, Due Diligence Questionnaires, or similar requests. Any reporting of personal data will be provided to third parties on an aggregated anonymised basis and will only be made available to third parties where employees have freely provided their explicit written consent. Employees are free to withdraw their consent to the processing of this data at any time.

## Miscellaneous

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