



## EQUALITY POLICY

### Policy Statement

Sanderson Asset Management LLP (“Sanderson”) recognises that discrimination and victimisation is unacceptable and aims to ensure that no Staff Member or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment, employment or LLP membership on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the “protected characteristics” under the *Equality Act 2010*). As such, selection for employment, membership, promotion, training or any other benefit will be on the basis of aptitude and ability. All Staff will be encouraged to develop their full potential and their talents and resources fully utilised to maximise the efficiency of the business.

Further, Sanderson’s Staff will not discriminate directly or indirectly, or harass, clients, consultants or service providers on the basis of any protected characteristic in the provision of Sanderson’s services.

This policy and the associated arrangements in the Personnel Handbook (“Handbook”) shall operate in accordance with statutory requirements and taking account of any relevant guidance or codes of practice issued by the Equality and Human Rights Commission, any government departments and any other statutory bodies.

### Sanderson’s Commitment

Further to the Core Values set out in the Handbook, Sanderson is committed to creating an environment in which individual differences and the contributions of all our Staff are recognised and valued. Every Staff Member is entitled to a working environment that promotes dignity and respect for all. Sanderson believes that the promotion of equality in the workplace is good management practice and makes sound business sense. As such, no form of intimidation, bullying or harassment will be tolerated.

Breaches of this policy will be regarded as misconduct and could lead to disciplinary action. This policy is fully supported by Sanderson’s senior management and, as set out below, will be monitored and reviewed.

### Responsibilities of Management

Day-to-day responsibility for ensuring the effective implementation and operation of the arrangements in this policy will rest with the managers of each of Sanderson’s business groups. These senior managers will ensure that they and the Staff in their group operate within this policy, and that all reasonable and practical steps are taken to avoid discrimination. Each senior manager will ensure that:

- all the Staff in their business group are aware of the policy and the reasons for having it in place;
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible;
- proper records are maintained.

### Responsibilities of Staff

Responsibility for ensuring that there is no unlawful discrimination rests with all Staff and their attitudes are crucial to the successful operation of fair employment practices. In particular, all Staff Members should:

- comply with the policy;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other Staff who have, or are perceived to have, one of the protected characteristics;

- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic;
- inform the Personnel Manager or their business group manager if they become aware of any discriminatory practice.

### **Third Parties**

Third-party harassment occurs where a Staff Member is harassed on the basis of a protected characteristic by third party such as a service provider or client. Sanderson will not tolerate such actions against its Staff, and the Staff Member concerned should inform the Personnel Manager or their business group manager at once. Sanderson will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

### **Rights of Disabled People**

Sanderson recognises the importance of the needs of disabled people. Under the terms of this policy, the firm will:

- make reasonable adjustment to maintain the services of a Staff Member who becomes disabled, for example, training, provision of special equipment, reduced working hours;
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

Staff requiring adjustments or accommodations due to a disability should notify the Personnel Manager or their business group manager.

### **Equality Training**

Training will be provided for all Staff on equality and diversity issues.

### **Policy Ownership**

The Personnel Manager will be responsible for periodically monitoring the operation of this policy in respect of Staff and job applicants and will maintain procedures for this purpose. Any questions that Sanderson Staff may have about this policy or its operation should be referred to the Personnel Manager.

All employment policies and arrangements have a bearing on equality of opportunity. Sanderson's policies will be reviewed regularly and any identified discriminatory elements removed.

### **Grievance and Disciplinary Procedures**

Harassment and discrimination will be treated as disciplinary offences and dealt with accordingly under the terms of the Handbook. Any Staff Member who feels that they have been the subject of harassment or discrimination should not hesitate to report this to the Personnel Manager or their business group manager, or raise a complaint in accordance with the Grievance and Disciplinary Procedures set out in the Handbook.