

INCLUSION POLICY

1. INTRODUCTION

Our organisation is made up of brilliant people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations and we value our people for the differences they bring to the table. This diversity is powerful.

Fostering an inclusive culture helps each of us to benefit from a wider range of these different perspectives, experiences, and skills. We believe that this creates a happier, more productive, and inclusive working environment for us all. To support this inclusive culture, this policy:

- outlines our commitment to diversity, equality and inclusion and sets out how we put this commitment into practice; and
- explains the behaviours we expect of our people in support of this commitment.

2. POLICY SCOPE

This policy applies to employees, contingent workers, volunteers, interns, work experience students and apprentices across all Rathbones Group entities. The policy also relates to external candidates and is relevant to all stages of the employment relationship.

There are certain sections of the policy which only apply to employees – these sections are clearly marked. It should be read by all and in conjunction with the following Rathbones policy documents:

- Grievance Policy
- Disciplinary Policy
- Recruitment Policy

3. OUR COMMITMENT TO YOU

We believe that a culture of equality, diversity and inclusion not only benefits our organisation but supports wellbeing and enables our people to work better because they can be themselves and feel that they belong.

We are committed to promoting a working environment based on dignity, trust, and respect, and one that is free from discrimination, harassment, bullying or victimisation.

We make sure that before and during employment we do not treat people less favourably because of any protected characteristic (defined further below). This practice used to commonly be known as Equal Opportunities and within this Inclusion Policy Rathbones extends this commitment to you.

4. WHAT WE EXPECT FROM YOU

We expect you to take personal responsibility for applying this policy and to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute. By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.

If any individual believes that this policy is not being adhered to then they are encouraged to bring this to the attention of their line manager or raise the matter as a grievance under the Grievance Policy.

If any of our people are found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under the Disciplinary Policy.

5. WHAT IS DISCRIMINATION?

Within Rathbones Group we look to protect and prohibit discrimination in line with the local legislations, this includes:

- The Equality Act 2010, Equality Act (Amendment) Regulations 2023
- The Prevention of Discrimination (Guernsey) Ordinance
- Discrimination (Jersey) Law 2013
- The Equal Status Acts 2000-2018 (Ireland)

We see the protected characteristics as:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race including colour, nationality, ethnic or national origin;
- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.
- carer status (Guernsey)
- family status (Ireland)
- membership of the traveller community (Ireland)

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those groups at a disadvantage.

Different types of discrimination under the Equality Act 2010 (UK)

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled, and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure, or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
 - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
 - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.

- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to make sure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
 - changing their working hours or place of work;
 - adjusting procedures for assessing job candidates; and
 - modifying disciplinary and grievance procedures.
- **Harassment and sexual harassment:** Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of; violating someone else's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.
- **Sexual harassment:** Conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.
- **Victimisation:** Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

6. BULLYING

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.

Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

Addressing bullying and/or harassing behaviours is challenging. The best way to resolve the issue at the earliest opportunity is by ensuring the other party is aware of the impact of their behaviour. This could include speaking to the other party directly or involving a manager to facilitate a discussion.

If early resolution is unsuccessful or the bullying or harassing behaviour is significant or persistent in nature, the employee or manager may initiate a formal procedure under the Grievance Policy. Further details are set out in that policy.

7. RECRUITMENT

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible and we aim to avoid discrimination in relation to recruitment and selection, including selection for promotion, redundancy, training, and development. Recruitment and selection will be based on merit using objective selection criteria.

Full details of how we manage our recruitment processes are set out in our Recruitment Policy.

8. TERMS AND CONDITIONS, PROMOTION, TRAINING, DISCIPLINARY, GRIEVANCE PROCEDURES

All learning, development and promotion decisions will be made based on merit.

The terms and conditions, benefits, and access to facilities available to employees are regularly reviewed to make sure that they comply with this policy and that there are no unlawful obstacles to access.

9. DISABILITY INCLUSION

Recruiting individuals with a disability

Full details of our approach to recruiting individuals with a disability is set out in our Recruitment Policy.

Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.

We also encourage you to join our Abilities Count Network to speak with others who also have experience of disability and who understand the associated workplace challenges. You can make your voice heard and make a difference by helping raise disability awareness and understanding across the wider organisation.

10. SUPPORT

If you need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice. Details of how to access this service are on our intranet.

11. MONITORING

To make sure that this policy is operating effectively and to identify those sections of the local community which may be under-represented in employment, we monitor applicants' and employee demographic information, including special category protected characteristics eg: race and ethnicity, gender identity, disability, sexual orientation and age as part of the recruitment procedure and employee lifecycle. Rathbones also maintain records of this data as per the D&I Data Capture Appropriate Policy. All reporting of demographic data is in an anonymised format solely for the purposes stated in policy.

Ongoing monitoring and regular analysis of the data obtained provide the basis for taking appropriate steps to eliminate unlawful direct and indirect discrimination and implement this policy, as well as helps Rathbones to develop our Inclusion Strategy.

12. ROLES AND RESPONSIBILITIES

Every colleague has a responsibility for applying this policy and to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) with dignity, trust and respect.

The policy will be maintained by the Inclusion Team who report directly into the Chief People Officer and indirectly into the Board, GEC, and Responsible Business Committee.

13. BREACH OF POLICY

All employees may be subject to disciplinary action for breaching this policy, up to and including termination of employment. With regards to individuals (consultants, contractors, suppliers, etc) who are not employees, but who breach this policy, the Group may exercise any and all of its contractual rights. All employees or individuals may also be subject to regulatory, civil, or criminal proceedings, depending on the circumstances.

14. VERSION CONTROL

Version control			
Version #	Change	Approved by	Date

1.0	Group policy review	Head of Diversity & Inclusion	04/03/2025
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