



## Scope

This Policy applies to all Liontrust entities (collectively “Liontrust”) set out below, their employees, partners and associated persons including contractors, interns, and consultants, who are with Liontrust for over a 4 week period.

- Liontrust Asset Management Plc (employees only)
- Liontrust Investment Funds Limited (partners only)
- Liontrust Fund Partners LLP (FRN: 518165) (partners only)
- Liontrust Investment Partners LLP (FRN: 518552) (partners only)

## Summary

Liontrust is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination in line with the Equality Act 2010. The Company believes that all employees/Partners, clients, suppliers, contractors and job applicants are entitled to be treated with respect and dignity, creating an inclusive culture.

### **The Company aims at all times to:**

- actively oppose all forms of discrimination, bullying and harassment
- ensure that all job applicants and employees/Partners receive fair and equal treatment
- select, recruit, develop and promote on the basis of capability, qualifications, experience, skills and performance
- maintain a working environment free from harassment and intimidation
- treat seriously and deal promptly with any complaints of alleged discrimination/bullying/harassment/victimisation, ensuring a thorough investigation, and the implementation of remedial action if necessary.

## Understanding Discrimination

All employees/Partners have a right to decide what behaviour is acceptable to them and to have their views and feelings respected by others.

## **Equal Opportunities and Dignity at Work Policy**

Lack of understanding can sometimes result in unwanted and inappropriate behaviour. Liontrust therefore feels that it is important that employees/Partners understand the meaning of discrimination and the types of discrimination that exist.

Discrimination is unequal or differential treatment which leads to one person being treated less favourably than others are, or would be, treated in the same or similar circumstances because of a “protected characteristic”.

There are nine protected characteristics, these are:

1. race (which includes colour, nationality, and ethnic or national origins),
2. sex,
3. pregnancy and maternity,
4. marital or civil partnership status,
5. gender reassignment,
6. disability,
7. religion or beliefs,
8. age or
9. sexual orientation.

Discrimination may be direct or indirect.

### **Unlawful Reasons for Discrimination**

#### **Sex**

It is not permissible to treat a person less favourably because of their sex, marital status, civil partnership, pregnancy or maternity, gender reassignment or transgender status. This applies to men, women and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination.

#### **Age**

It is not permissible to treat a person less favourably because of their age. This applies to people of all ages.

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### **Disability**

It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person. (\* See Employee Responsibilities below.)

### **Race**

It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality or their ethnic origin.

### **Sexual Orientation**

It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because s/he is homosexual, heterosexual or bisexual.

### **Religion or Belief**

It is not permissible to treat a person less favourably because of their religious beliefs or their religion or their lack of any religion or belief.

### **Types of Discrimination**

#### **Direct Discrimination**

Direct discrimination occurs when an individual is treated less favourably than another on the basis of a “protected characteristic” they possess, or are thought to possess (a sub-category called perception discrimination), or because they associate with someone who possesses that characteristic (a sub-category called discrimination by association).

#### **Indirect Discrimination**

Indirect discrimination occurs when there is a “provision, criterion or practice”, which although not discriminatory on the face of it, puts people with a particular protected characteristic at a particular disadvantage, when compared with those who do not share that protected characteristic.

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### **Dignity at Work**

#### **Bullying**

Bullying occurs when a person is subjected to offensive, intimidating, malicious or insulting behaviour which undermines, humiliates or injures the person on the receiving end.

#### **Harassment**

Harassment occurs when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, even if this was not the intention of the person responsible for the conduct.

Examples of harassment include (but are not limited to): physical conduct ranging from unwelcome touching to serious assault; unwanted sexual advances; disparaging comments about a person's appearance; unwelcome jokes, "banter", or comments of a sexual or racial nature or about an individual's age or disability; excluding or ignoring an individual because they are associated with someone who has a protected characteristic or because they are perceived to be connected to someone with a protected characteristic; repeated name calling; use of obscene gestures, pictures or objects with sexual or racial overtones.

Behaviour which any reasonable person would find offensive, for example sexual touching will be deemed as harassment without the recipient having to make it clear in advance that this behaviour is not acceptable.

In cases where it is not clear that certain conduct would cause offence, this will not be deemed harassment. However, if the conduct continues after the recipient has made it clear by words or conduct that such behaviour or conduct is offensive to them, this will become harassment.

#### **Victimisation**

Victimisation occurs when a person is treated less favourably because they have done something such as raise a grievance, brought a claim complaining of discrimination, supported someone to make a complaint or given evidence in relation to a complaint.

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### **Employee/Partner responsibilities**

All employees/Partners of Liontrust are required to act in a way that does not subject any other employees/Partners, clients or job applicants to direct or indirect discrimination, bullying, harassment or victimisation because of their race, sex, pregnancy or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Employees/Partners are expected to be aware of how their own behaviour may affect or be perceived by others and change it if necessary.

Employees/Partners are expected to fully comply with the Equal Opportunities Policy and will be subject to the Disciplinary Procedures if they are found to be in breach of it.

Deliberate acts of discrimination/ bullying/ harassment/ victimisation are considered to be gross misconduct.

- Where harassment is related to one of the protected characteristics, individuals can be held personally liable. Serious cases of bullying or harassment may amount to other civil or criminal offences under the Protection from Harassment Act 1977.
- If an employee/Partner has a disability and feels reasonable adjustments would be of benefit they should contact HR.

### **Company Responsibilities**

The Company will provide compulsory Equality and Diversity training to all existing and new employees/Partners to ensure that all employees/Partners are adequately informed of their rights and responsibilities under this policy and to ensure a working environment free of all forms of discrimination, bullying and harassment,

### **Acting on Discriminatory Behaviour**

In the event that an employee/Partner feels they are being subjected to discriminatory behaviour/harassment/victimisation they can raise their complaint informally or formally – please refer to the Grievance Procedure. Employees/Partners are assured that allegations will be treated seriously and dealt with promptly. Disciplinary procedures will be instigated as appropriate, where employee(s)/Partner(s) are the subject of

## **Equal Opportunities and Dignity at Work Policy**

discrimination/harassment/victimisation allegations.

All employees/Partners have the right to raise a grievance for discrimination/ bullying/ harassment in good faith, even if it is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you, which could result in dismissal.

### **Third party harassment**

Employees/partners who feel they are being subjected to harassment by people who are not employees/Partners of Liontrust – e.g. clients or suppliers – should raise the matter with their Line Manager. The Line Manager is responsible for informing HR.

### **Linked Policies**

The following policies should be read in conjunction with this Policy:

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### Policy Administration

<b>Owner</b>	
<b>Governance Owner</b>	<i>[Committee that has approved the document]</i>
<b>Effective Date</b>	
<b>Review Cycle</b>	
<b>Document Distribution</b>	[Internal/External] - Confidential

### Version Control

<b>Version</b>	<b>Date</b>	<b>Edits Made By</b>	<b>Change Details</b>	<b>Approved By &amp; Date</b>
1	July 2021	Alison Isbill	First Release	Vinay Abrol
1	June 2014	Alison Isbill	No updates made	
3	September 2015	Marie Ford	Inclusion of job applicants	Alison Isbill
3	September 2016	Marie Ford	Inclusions of perception discrimination and discrimination by association	Alison Isbill
4	July 2017	Ross Hadden		
5	November 2017	Catrina Stevens	Inclusion of harassment and bullying	Ross Hadden
6	April 2019	Lynne Anderson-Edwards	Remains relevant	Ross Hadden
7	February 2021	Karen Downey	New template. Policy remains relevant	

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