

EQUAL OPPORTUNITIES POLICY

1 Introduction

- 1.1 At 17Capital we recognise the importance of diversity, equality and inclusion (referred to as “DEI” in this policy). We are fully committed to providing an environment in which each employee is recognised, valued, able to fulfil their full potential and maximise their contribution. We appreciate and value the creative potential that individuals of different backgrounds and abilities bring and work hard to ensure an inclusive and supporting culture where differing views and experience are respected. We firmly believe that such a culture significantly enhances our ability to perform as a business.
- 1.2 17Capital is also committed to providing a working environment free from discrimination, victimisation, harassment and bullying and ensuring all our employees are treated, and treat others, with dignity and respect. We also aim to create a harmonious working environment in which no employee feels apprehensive and which is conducive to the health, confidence, morale and effective performance of our employees.
- 1.3 Our policy is to treat all job applicants, employees, officers, consultants, contractors, casual workers, agency workers and people with whom we do business in the same way, regardless of their age, sex, gender, gender reassignment, pregnancy and maternity, marital or civil partner status, sexual orientation, race, nationality, religion or belief, ethnic origin or disability.

2 Values and objectives

We consider DEI in all aspects of working life at 17Capital. In particular, we strive to:

2.1 Promote equality in all aspects of employment

We do this by:

- 2.1.1 providing equal treatment in aspects of working life in line with the Equality Act 2010, including in relation to:
- recruitment, selection and retention
 - terms and conditions of employment
 - training, development and career progression
 - compensation and reward.
- 2.1.2 discouraging assumptions about ability based on any protected characteristic including age or disability, confronting racist, sexist and homophobic, biphobic and transphobic attitudes, behaviours and language, and encouraging the understanding of gender identity, as well as marital/civil partnership status.
- 2.1.3 confronting and eliminating discriminatory and other inappropriate behaviour through use of the Disciplinary Procedure where necessary.

2.2 Increase diversity throughout the business

We do this by:

- 2.2.1 using recruitment and selection practices to attract a broad selection of talent from diverse backgrounds and encouraging applications from under-represented groups.

2.2.2 enhancing our diversity metrics via reporting and staff engagement surveys.

2.2.3 promoting an environment where people recognise the value that a diverse and inclusive workforce brings.

2.3 **Provide training and developing awareness**

We do this by:

2.3.1 providing awareness training and guidance to all employees and managers to ensure our commitment to DEI is known and understood, including unconscious bias workshops.

2.3.2 ensuring that the principles of this policy are reflected in 17Capital's goals and objectives, and appropriate policies and procedures.

2.4 **Support family friendly policies**

We do this by:

2.4.1 promoting family friendly and agile working policies.

2.4.2 ensuring staff are supported when making work-life balance choices about their parenting, caring and work roles and responsibilities, as appropriate to the needs and demands of the business and applicable laws.

2.5 **Work with other organisations**

We do this by:

2.5.1 continuing to support efforts to educate underrepresented groups through our work with Epic, Think Forward and Sports Dans Le Ville.

2.5.2 working with external groups and advisory bodies to keep up to date with external best practice.

2.6 **Show high level commitment**

We do this by:

2.6.1 making DEI part of the Executive Committee and the ESG Committee agenda and continuing to demonstrate visible commitment from our leadership.

2.6.2 communicating and regularly reviewing DEI inclusion initiatives that have been successfully implemented.

2.7 **Be recognised as an employer with high DEI standards**

We do this by further embedding inclusive behaviour within our culture, being recognised as an employer with positive DEI practices and championing DEI issues both internally and externally.

3 **Responsibility**

3.1 All employees have a role to play to ensure that any form of discrimination and any actions which go against the spirit of this policy are avoided. Employees at all levels must ensure that there is no unlawful discrimination or other unacceptable behaviour in the workplace. All employees must:

3.1.1 implement this policy in their day-to-day work and their dealings with colleagues and third parties;

- 3.1.2 ensure their behaviour is appropriate and that they treat people with respect and dignity;
- 3.1.3 report any suspected discriminatory acts or practices;
- 3.1.4 not victimise anyone who has complained about, reported or provided evidence of discrimination; and
- 3.1.5 not harass, abuse or intimidate others.
- 3.2 Managers are responsible for implementing the policy as part of their day-to-day management of employees and in applying employment policies and practices in a fair and equitable way. All managers must:
 - 3.2.1 ensure DEI issues are immediately addressed;
 - 3.2.2 encourage all employees to act in accordance with the DEI policy, providing necessary support and direction; and
 - 3.2.3 effectively manage and deal promptly when investigating issues relating to potential discrimination.
- 3.3 Senior management are responsible for providing leadership on the DEI policy, acting as overall role models to ensure the policy is implemented and communicated accordingly.
- 3.4 However, whilst all employees have a collective and individual responsibility to ensure this policy is effectively implemented, members of the Executive Committee and the ESG Committee are primarily responsible for ensuring this policy and its principles are successfully integrated into working life at 17Capital.

4 **Prohibited behaviour**

Everyone must ensure that they do not, by their own actions, behaviour or attitude, directly or indirectly discriminate against, victimise, bully or harass anyone else, whether at work, working remotely, on business trips or at any work-related social functions or events. This applies to staff (which may include consultants, contractors and agency workers) and also to third parties such as clients, investors, suppliers or visitors to our premises.

Various forms of unacceptable behaviour are explained below:

- 4.1 **Bullying:** Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying may include physical or psychological threats, overbearing and intimidating levels of supervision or inappropriate derogatory remarks about someone's performance. Please note however that legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment will not amount to bullying on their own.
- 4.2 **Harassment:** Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment may relate to a protected characteristic (see above) but harassment is unacceptable even if it does not. Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. A single incident can amount to harassment.
- 4.3 Examples of harassment include spreading malicious rumours about someone's sexuality, teasing someone about a disability they have, sending offensive emails, making suggestive remarks or making unwelcome sexual advances. A person may be harassed even if they

were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

- 4.4 **Direct discrimination:** Direct discrimination occurs when someone is treated less favourably because of a protected characteristic (encompassing age, sex, gender, gender reassignment, marital status, sexual orientation, race, nationality, religion or belief, ethnic origin or disability). For example, rejecting a job applicant because of their religious views or because they might be gay.
- 4.5 **Indirect discrimination:** This occurs where a practice applies to everyone but adversely affects people with a particular protected characteristic more than others, and it is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- 4.6 **Victimisation:** This is retaliation against someone who has complained or has supported someone else’s complaint about discrimination or harassment. An example of victimisation would be denying a promotion to a female employee because she had made a complaint of sex discrimination.

5 **Making a complaint**

- 5.1 If you are being harassed, bullied, victimised or discriminated against, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you feel uncomfortable. If this is too difficult or embarrassing, you should speak to your Manager or People & Talent, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 5.2 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your Manager or People and Talent informally for confidential advice.
- 5.3 If these informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out in our Grievance Policy. We will aim to deal with any approach confidentially except where any investigation makes this not reasonably practicable or undesirable.
- 5.4 Staff should feel able to raise such issues and no-one will be penalised for doing so unless the complaint made is untrue, malicious or made in bad faith.
- 5.5 Any breach of 17Capital’s Equal Opportunities Policy will be taken seriously by 17Capital and may result in disciplinary action being taken. Such behaviour may constitute gross misconduct resulting in summary dismissal in the absence of mitigating circumstances.