

## Equality and Diversity Policy

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This policy applies to Premier Asset Management Limited, Premier Fund Managers Ltd and Premier Portfolio Managers Ltd, which are subsidiaries of Premier Miton Group plc. It also applies to Premier Miton Group plc and any other subsidiaries of Premier Miton Group from time to time (together "Premier Miton").

Premier Miton is committed to promoting equality and diversity. We aim to create a working environment where everyone feels respected and valued, regardless of their background or characteristics.

This policy covers all employees, officers, consultants, contractors, volunteers, casual and agency workers and job applicants. It applies to all areas of employment including recruitment, selection, training, deployment, career development, promotion, benefits and conditions, appraisals, conduct at work and termination of employment.

We are also committed to providing equitable treatment for all those we deal with as an organisation, including our investors and suppliers.

The purpose of this policy is to:

- Ensure that all employees and applicants are treated fairly and without discrimination.
- Promote a culture of respect and inclusion.
- Comply with relevant employment legislation.

### Introduction

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Premier Miton Investors ("Premier Miton") is an equal opportunities employer. We are committed to equality of opportunity and to following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no person receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage or civil partnership status, pregnancy or maternity, race, colour, nationality, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment, for further information employees should refer to the Harassment and Bullying policy found in our Staff Handbook.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it any time. The HR team is responsible for this policy and will review it annually.

### Defining equality, inclusion and diversity

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The terms equality, inclusion, diversity and equity are at the heart of this policy. 'Equality' means ensuring everyone has the same opportunities to fulfil their potential free from discrimination. 'Inclusion' means ensuring everyone feels comfortable to be themselves at work and feels the worth of their contribution. Celebrating 'Diversity' means having people with a range of different thought processes, as well as a range of different backgrounds, lifestyles, experiences and

interests, amongst the workforce. 'Equity' means fairness and justice, and recognising barriers and advantages that some groups may have compared to others, and putting measures in place to eliminate these barriers, making adjustments where necessary to imbalances, ensuring fair opportunities for all.

We want to encourage everyone in our business to reach their potential, and we will actively support diversity, equity and inclusion and ensure that our workforce feels valued and is treated with dignity and respect. We want to actively promote a culture that values difference and eliminates discrimination in our workplace.

## Our commitment as an employer

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Premier Miton is committed to:

- creating an environment in which individual differences and the contributions of our staff are recognised and valued.
- providing a working environment that promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated.
- promoting psychological safety and empowering employees by providing channels to feedback, escalate and report unacceptable practices or behaviour.
- providing training, development and progression opportunities to all staff
- understanding that equality and inclusion in the workplace is good management practice and makes sound business sense.
- reviewing our policies, employment practices and procedures to ensure fairness and inclusion for all
- taking steps to ensure equity amongst our workforce such as ensuring that our vacancies are advertised to a diverse range of potential candidates and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our workforce or industry.
- where appropriate, taking measures to identify and remove unnecessary obstacles and to meet the special needs of disadvantaged or underrepresented groups and
- regularly monitoring the diversity of our workforce to promote equal opportunities throughout the Company.

## Training

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All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

All employees, workers or self-employed contractors whether part time, full time, permanent or temporary, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit will be made on the basis of aptitude and ability. Equality of

opportunity, valuing diversity and compliance with the law is for the benefit of all individuals working in Premier Miton.

While specific responsibility for eliminating discrimination and providing equality of opportunity lies with managers and supervisors, individuals at all levels have a responsibility to treat others with dignity and respect. We will provide regular training to ensure that everyone is aware of and understands the contents of this policy.

The personal commitment of everyone to this policy and the application of its principles are essential to eliminate discrimination and provide equality and equity throughout the Company.

## Discrimination

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Premier Miton employees, consultants and contractors must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers etc. Further information is set out in the Harassment and Bullying policy in our Staff Handbook.

## Recruitment and selection

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Recruitment, promotion and other selection exercises (such as redundancy selection) will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity; by removing from CVs identifying details and gendered language where possible, by using a range of recruitment consultants and asking them to provide us with balanced short lists in regards to gender, ethnicity and educational background, and by engaging with programmes such as Investment20/20 to broaden the reach of our recruitment efforts.

Our recruitment procedures will be reviewed regularly to ensure that individuals are being objectively assessed on the basis of their merits and abilities. We will also monitor the composition of our workforce and may use this information to promote equal opportunity and diversity.

## Advertising

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Advertisements should avoid stereotyping or using wording that may discourage certain groups from applying. They should include a short statement on equal opportunities and Premier Miton's commitment to equality, diversity and inclusion in the workplace and state that a copy of this policy will be made available on request.

Advertising of all positions will be carried out both internally and externally. Vacancies will be posted on the Premier Miton website and signposted to current staff via regular emails sent from the HR team.

## Screening and Interviewing

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Screening will be carried out by matching details of applicants to the requirements of the job. The screening criteria will be applied consistently to all applicants.

If it is necessary to use selection tests for a job, they will only relate to non-biased, genuine objective requirements of the role. Records of any testing undertaken will be retained for a period of one year.

The interview process will be carried out in the following way:

- no assumptions will be made on the grounds of age, disability, gender reassignment, marriage/civil partnership, pregnancy, maternity, race, religion or belief, sex or sexual orientation.
- Any questions will relate to the requirements of the job as established in the job description and the person specification
- interviews will be carried out by more than one person and the interview panel will preferably comprise of individuals of both genders
- applicants will be assessed at the end of the interview process against pre-defined objective criteria
- records of the interview process will be retained for a period of one year, including any interview notes and CVs.

## References

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All external candidates will be required to provide either six years' worth of referencing history or at a minimum, two satisfactory references prior to appointment. Should a manager wish to ask any question not mentioned on the standard reference checking form, authorisation from HR is required. Referees will not be contacted without the permission of the relevant candidate. Should a candidate not be in a position to provide either six years' worth of referencing history or two references, the issue will be dealt with by the relevant manager and the HR team to determine if an alternative approach should be considered, on a case- by-case basis.

## Immigration laws

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Premier Miton is required by law to ensure that all employees are legally entitled to work in the United Kingdom. All prospective employees, irrespective of nationality, will be required to produce original documents to satisfy current immigration laws or to undertake an appropriate right to work check online.

## Disability

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Job applicants should not be asked about health or disability before a job offer is made, except in 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 might be needed at interview because of a disability.

However, if an employee has or develops any disability, we encourage them to tell us about their condition so that we can consider what reasonable adjustments may be appropriate.

## Part-time and fixed-term work

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Part time and fixed term staff should be treated the same way as comparable full time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

## PROMOTION

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Wherever possible, employees will be made aware of the promotional and career opportunities available to them from details circulated through the internet and emails. Training and job experience needed for promotional opportunities will be open to all employees. Promotion will be determined by merit and performance against objective criteria.

Unsuccessful internal candidates will be given feedback to facilitate improvement. Training in giving feedback will be provided to managers charged with this task.

No employee will be overlooked in relation to a promotion or an experience-broadening opportunity because of their reluctance to apply or accept on a previous occasion. The process surrounding promotion will be free from discrimination.

## BRACHES of this policy

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We take a strict approach to breaches of this policy which will be dealt with in accordance with our Disciplinary Procedure which is available in the Staff Handbook. Serious cases of discrimination may amount to gross misconduct resulting in dismissal without notice.

If an employee believes that they have suffered discrimination or witnessed it happening to someone else, they should initially raise the issue with their line manager and / or the HR team. They can also raise the matter through our Grievance Procedure or through our Harassment and Bullying Policy, found in our Staff Handbook, as appropriate.

There must be no victimisation or retaliation against staff who complain about or report discrimination. If an employee believes they have been victimised for making a complaint or report of discrimination or have witnessed it happening to someone else in the workplace, they should raise this through our Grievance Procedure.

We encourage the reporting of all types of potential discrimination, as this assists us in ensuring that equality, diversity and inclusion principles are adhered to in the workplace. However, making false allegations in bad faith, or that are known to be untrue, will be treated as misconduct and dealt with under our Disciplinary Procedure.