

Equality, Diversity and Inclusion

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The Firm's commitment

Our commitment

The Firm values a diverse workforce and the contribution each individual makes. We are committed to promoting inclusivity, equality and diversity in our policies, practices and procedures.

This Policy applies to the Firm's dealings with all its people as well as others engaged by or who work with the Firm including, for example, clients, job applicants and other third parties.

The Firm believes in treating everyone equally and with the same attention, courtesy and respect regardless of their age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion or belief, sex and sexual orientation. These will be referred to in this Policy as the "protected characteristics".

For the purpose of this policy "the Firm" relates to both Burgess Salmon LLP and Burgess Salmon Company Limited.

Regulation and Legislation

In developing and implementing our anti-discrimination policy, the Firm is committed to complying with the Solicitors' Regulation Authority's (SRA) principles and code of conduct in relation to equality and diversity and with all applicable anti-discrimination legislation and associated codes of practice, including the Equality Act 2010.

Forms of discrimination

Discrimination can take a variety of forms including direct discrimination, indirect

discrimination, harassment, victimisation and, for those with a disability, discrimination arising from disability and a failure to make reasonable adjustments. A brief summary of each of these is set out in Appendix 1.

Employment and training

General statement

As an employer, it is the Firm's policy to treat all employees and job applicants equally and fairly and not to discriminate unlawfully against them. This will, for example, include arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, selection for redundancies, work allocation and any other employment related activities.

Recruitment and selection

The Firm recognises the benefits of having a diverse workforce and will take steps to ensure that:

- it endeavours to recruit from the widest pool of suitably qualified candidates possible;
- employment opportunities are open and accessible to all on the basis of their ability, skills, experience, appropriate qualifications and aptitude for the job;
- all recruitment agencies acting for the Firm align with our equality and diversity requirements and their own requirement not to unlawfully discriminate.

Terms and conditions of work

It is the Firm's policy to treat its people

equally, to create a working environment which is free from unlawful discrimination and which respects, where possible, the diverse backgrounds and beliefs of partners and employees.

Working arrangements such as working hours, maternity and other leave arrangements, performance review systems and any other conditions of employment will not unlawfully discriminate against any employee in a way that cannot be justified on the basis of the protected characteristics.

Where appropriate, the Firm will endeavour to provide appropriate facilities and working arrangements which take into account the specific needs of employees which arise from their having any of, or being associated with, the protected characteristics.

Promotion and career development

Promotion within the Firm is made without reference to any of the protected characteristics and will be based solely on merit.

The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unlawful discriminatory impact on any particular group which cannot be justified.

Whilst positive action measures may be taken in accordance with the relevant anti-discrimination legislation to encourage under-represented groups to apply for promotion opportunities, recruitment or promotion to all jobs will be based solely on merit.

All employees will have equal access to >

training and other career development opportunities appropriate to their experience and abilities. The Firm may take appropriate positive action (as permitted by the anti-discrimination legislation) to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

Appropriate behaviour

It is expected that everyone in the firm will conduct themselves in an appropriate manner, which can be characterised by:

- treating others with dignity, trust and respect
- having an awareness of the effects our behaviour may have on others
- working collaboratively to achieve objectives
- communicating openly and honestly, clearly stating what we mean and what we expect of others
- giving and receiving constructive feedback as part of normal day-to-day activities, that is evidence based and delivered appropriately
- starting from the assumption that everyone is working to the best of their abilities, taking account of their current stage of their professional development.

Unacceptable behaviour (including bullying, harassment and victimisation) may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. Unacceptable behaviour does not have to be face-to-face, any may take many forms such as written, telephone or email communications or through social media. Unacceptable behaviour will be dealt with under the processes set out in our Anti-harassment and bullying policy.

All partners and line managers are expected to set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives in relation to equal opportunity, diversity and inclusion.

Promoting and communicating equality and diversity

This Policy is published on the Firm's intranet and is also available to job applicants on the Firm's website. In addition, diversity, inclusion and equality training is provided on a regular basis.

All those who act on the Firm's behalf will be informed of this policy and will be expected to comply with it.

In all its dealings, with clients and other third parties, the Firm will seek to promote the principles of diversity, inclusion and equality.

The Firm will make every effort to reflect its commitment to diversity, inclusion and equality in its marketing and communication activities where appropriate.

Implementing the policy

Responsibility and implementation

The Managing Partner supported by the Chief People Officer have overall responsibility for the effective implementation and operation of this policy. The partners of the firm are expected to support them in this. This Policy is also supported by the firm's Diversity & Inclusion group and people team.

All partners and employees of the Firm are expected to pay due regard to the provisions of this Policy and should ensure compliance with it when undertaking their jobs or representing the Firm.

Acts of unlawful discrimination by partners, employees or others may result in disciplinary action, which in serious cases could result in summary dismissal. Please see our Disciplinary Procedure for more information. Failure to comply with this Policy will be treated in a similar fashion.

Acts of unlawful discrimination by those acting on behalf of the Firm will lead to appropriate action, which may include termination of services where appropriate.

Complaints of discrimination

The Firm will investigate all complaints of unlawful discrimination made by partners, employees, clients or other third parties in relation to the Firm and take action where appropriate. All complaints will be investigated in accordance with

the Firm's grievance or complaints procedure and the complainant will be informed of the outcome.

There will be no victimisation or retaliation against employees who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Firm's Disciplinary procedure.

Monitoring and evaluation

- The firm's Diversity and Inclusion Group reports into the Partnership Committee of the Firm.
- The firm collects, reports and monitors diversity data. This allows us to see the effectiveness of equality and diversity initiatives that have been implemented, as well as helping us to take appropriate steps to avoid unlawful discrimination. Having up-to-date and comprehensive data enables us to target and support initiatives within the firm and illustrates our commitment to diversity and inclusion.
- In particular, the Firm will (in accordance with SRA requirements), as appropriate and where possible, monitor and record:
 - the protected characteristics, whether someone has caring responsibilities and their educational background (to measure social mobility), at different levels of the firm. This data is collected on a voluntary basis through the firm's annual diversity survey. The HR system securely holds age, gender, disability, ethnic and national origins, sexual orientation, religion or belief and disability data for employees and partners.
 - on a voluntary and anonymous basis the gender, ethnic group, disability, sexual orientation and age on of all applicants as part of the recruitment process for all jobs and training contracts. This data is kept separate from the candidates actual job application;
 - the number and outcome of any complaints of unlawful discrimination made by partners, employees, clients and other third parties in relation to the Firm and its business. >

- To support the firm's business strategy, the Diversity and Inclusion Group sets diversity and inclusion objectives. With specific priorities in mind the Diversity and Inclusion Group will:

- set specific areas of focus every 18-24 months;
- collect, monitor and report diversity and inclusion data;

- plan initiatives around agreed actions;
- execute those initiatives;
- evaluate initiatives to establish if they were successful.

Purpose and scope

This policy does not form part of your contract of employment and the Firm reserves the right to amend it from time

to time. A breach of this policy may result in disciplinary action. All other policies referred to within this policy can be found under the People Zone of the intranet.

Last updated January 2017

APPENDIX

Forms of discrimination

Protected characteristics under the Equality Act 2010 (the "Act") are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership
- pregnancy and maternity;
- race (including colour, nationality and ethnic or national origins);
- religion or belief;
- sex;
- sexual orientation.

Direct discrimination occurs where a person is treated less favourably than another person because:

- they have a protected characteristic;
- they are thought to have a protected characteristic; or
- they associate with someone who has a protected characteristic.

Indirect discrimination occurs when a provision, criterion or practice that applies to everyone but adversely affects people with the protected characteristic more than others and is not justified.

Discrimination arising from disability occurs where a person is treated unfavourably because of something arising in consequence of their disability and that treatment is not justified.

Failure to make reasonable adjustments occurs where the Firm fails to take such steps (adjustments) as are reasonable to alleviate disadvantages caused by a disability.

Harassment occurs when unwanted conduct related to a relevant protected characteristic takes place with the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve

physical acts or verbal and non-verbal communications and gestures. Harassment is dealt with in our Anti-harassment and bullying policy.

Victimisation occurs when an employer subjects a person to a detriment because the person has carried out (or the employer believes they have or may have carried out) what is referred to as a 'protected act'. A protected act includes:

- bringing proceedings under the Act;
- giving evidence or information in proceedings brought under the Act;
- doing anything which is related to the provisions of the Act;
- making an allegation that another person has done something in breach of the Act.