

SVQ11_EDI_AthlaCapital Management

Athla's commitment to ED&I and how this can benefit the Joint Venture

The Athla CEO will be responsible for this area of the contract which will be delivered in line with Strategic Goal and Objective 5.3.

Collection and reporting and using diversity monitoring data

We have built an EDI due diligence and monitoring software tool that reflects the data collection requirements of HS2's EDI requirements. (Using HS2's latest EDI report as the base line, with augmentations). This includes an interface for us, our supply chain and portfolio companies to collect EDI data, as frequently as is required. It includes automated analytical tools to calculate key measurements and can monitor EDI statistics over multiple time periods. It also collects case studies. The data can be presented in word or excel/csv format for further analysis. We will supply the raw data to HS2 and also use it for our annual EDI report, which will to be made available on our website. The tool can also create the basis for a public HS2 Fund EDI report.

We will use the reports to encourage discussion amongst our team, our supply chain and HS2 Fund portfolio companies about EDI issues, at our annual EDI webinar (compulsory representation).

Where the data reveals weaknesses in EDI at portfolio companies, we present our findings to the board and request a Continual Improvement Plan (see below) is made available within c. six months. We will monitor and support progress until the rectification is implemented.

HS2 Fund portfolio company boards will be obliged, as a condition of investment, to:

- Produce and publish an EDI policy
- Submit data using our EDI due diligence and monitoring tool on demand by the deadline set.
- Where a rectification plan is required agree to support the plan and implementation process.

Evidence that we are promoting the Equality Act 2010

Our EDI policy is available on our corporate intranet (Teams) for all to see. We publish our EDI policy on our website and deliver a copy to stakeholders prior to contract signing. We seek to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. We publish quality objectives, at least every four years and information to demonstrate their compliance with the public sector equality duty.

Our EDI policy (see below) adheres to HS2's EDI policy. We will seek to obtain the appropriate ISO certification (considered to be IS26000 and ISO30414) once we have achieved the other ISO standards in our roadmap (currently 9001, followed by 27001).

Demonstration of diversity of thought and inclusive practices are applied in our organisation to ensure a high performing and competitive team and organisation

Our team is 33% identified as having a neurodiverse disability. (We always seek specific permission from our staff to identify diversity characteristics to third parties, on an anonymised basis before we refer to them or their activities).

This is of advantage to our organisation because one team member has upskilled in the area of valuations to a very high level of expertise in 18 months such that he has been promoted to Senior Valuations Analyst. He is now leading his own team. We are providing support to him in developing his managerial skills.

The other team member who is neurodiverse initially struggled within our organisation due to his disability. Following a discussion with executive management, it was agreed he should be offered the opportunity to fill the vacant role as our in-house software developer, which he accepted. He has discovered that he is a highly productive and skilled software developer

producing excellent work. He is achieving high levels of satisfaction from working in a role where his positive contribution to the company is demonstrated and recognised by all. He now has a career path and opportunity for financial advancement. We can develop new software tools faster, better and more cost effectively than before.

The consequences of our success in finding the benefits of using neurodiverse people in certain roles is that the quality of our products and services has improved, we are achieving higher levels of financial success and the team has a whole has understood that people with disabilities, when in the right job can contribute at an equal level to everyone else.

We are committed to encouraging good mental health in the investment ecosystem to address the stresses of being an entrepreneur or working in finance. Our technology roadmap includes a project to work with mental health experts either to licence or build a best of breed software solution to be used by HS2 investees to support good mental health practices and those struggling with their mental health.

We encourage healthy living practices and positive social engagement within our company. We are a remote team so face to face interaction on a day-to-day basis is difficult. Many of our team our young so working from home can be challenging. They also lack the benefits of “office life” in terms of informal training and development. To address this management are always available on Teams and meet for twice a month for two days in person where we operate normal working days; on one evening we host a team dinner. We take our staff to live meetings with customers and suppliers, which assists with their career development.

We take legal advice before acting as before using protected characteristics to make decisions.

Communication, monitoring, implementation and reporting on the impact of these activities

Our EDI due diligence and monitoring tool, plus reports will be used in the first instance to create a baseline set of EDI statistics. Then and thereafter, anonymised reports will be used to communicate about EDI with our stakeholders, as appropriate. Our annual report will be put in the public domain and we will promote its publication in the media (including social media). These reports will include data and qualitative examples to explain the impact of success in EDI activities to “nudge” improved behaviours by all. We will encourage the creation of and accept invitations to speak in public on EDI issues especially in the investment market.

Continual improvement plan for our team, organisation and the Joint Venture (including portfolio companies)

Our standard EDI improvement plan is set out below. We propose to use this as the template for portfolio companies and adapt it for specific scenarios. As required we will amend this plan so that it is acceptable Limited Partners and aligns with their EDI policies.

		Resp.	Est time
1	Annual collection of EDI data and analysis against past performance and peer group.	EDI manager	½ day
2	Identify specific issues of concern or areas requiring improvement.	EDI manager	½ day
3	As appropriate seek qualitative evidence in respect of areas of concern or areas requiring improvement.	EDI manager	2-14 days
4	Invite representatives from stakeholders to support EDI manager in creating and implementing an improvement action plan.	EDI manager	½ day
5	Create action plan for issues of concern or improvement.	EDI manager	1 day

6	Prepare report on action plan.	EDI manager	1 day
7	Circulate action plan with stakeholders to gain consensus of approach and planned outcomes. Agree who will have responsibility for implementation, monitoring and reporting. Appoint/announce Action plan manager.	EDI manager	3 weeks
8	Present action plan to board for approval.	Action plan manager	½ day
9	Announce action plan and monitor implementation. If problems with implementation, revisit steps 5-9.	Action plan manager	As required
10	Following successful implementation of action plan. Review and update, inter alia, EDI policy and Staff Handbook. If necessary, change data points for collection. Consider whether useful as a case study.	EDI manager	1 day
11	Completion meeting: confirm Action plan successful implemented and inform board	EDI manager	½ day

Athla Capital Management EDI policy

Responsibility: Modwenna Rees-Mogg CEO	Monitoring: Quarterly review	Implementation date: 9 August 2022	Review date: Next board meeting
<p>Statement</p> <p>Athla Capital Management leads by example and embeds EDI in all its activities. It complies with anti-discrimination legislation and Equality and Human Rights Commission (EHRC) Codes of Practice and treats all people fairly and equally so that no one group of people is treated less favourably than others. We comply in terms of service delivery, employment and supply chain. We are committed to developing, maintaining and supporting a culture of equality, diversity and inclusion in our workforce, in the planning and operation of our products and services, and amongst our stakeholders (all of whom we treat fairly). In particular, we:</p> <ul style="list-style-type: none"> - Proactively minimise the potential for discrimination, harassment and bullying - Seek out opportunities to promote inclusive development - Seek out the views of stakeholders - Take the necessary steps so that people with protected characteristics do not experience disproportionate disadvantage as a result of activities - Promote an environment that is free from discrimination, harassment, bullying and victimisation and tackle any behaviour breaches - Create opportunities for local, disadvantaged and underrepresented people and companies to benefit from our activities, particularly our investment activities, by being an equal opportunities organisation, providing training in EDI, promoting equal outcomes and creating equal opportunities for skills and employment - Build a team that reflects the communities it serves - Provide continual training, support and encouragement to employees and to staff at portfolio companies, so they can develop their careers and contribute to the company and society. - Involve employees and their representatives in the development, implementation monitoring and review of human resources policies, procedures and flexible working arrangements. - Deliver value through effective management of our products and services in a sustainable and reliable way to provide exceptional levels of service. 			

- Create a diverse, inclusive and skilled workforce at all levels including in our supply chain and portfolio companies by promoting fair employment practices to bring economic benefits to all.

This policy applies to all workers including Board members, employees, consultants, temporary workers, agency staff, secondees, portfolio companies and other third parties working with us (including customers and those in our supply chain). This Policy sets out how we will address the needs of people and communities who have protected characteristics as specified within Equality Act 2010. We meet FCA requirements in respect of Equality, Diversity and Inclusion as an Appointed Representative of Frank Investments Ltd.

Communication of policy

Employees and supply chain

All employees are provided with a Staff Handbook on appointment which explains our approach to equality, diversity and inclusion. The Staff Handbook is also shared with board members, suppliers, contractors and consultants. We do not work with any trade union or other representative group members at present, but if this opportunity arises we will work with the trade union representative to ensure that our Staff Handbook is compliant with the union's or representative group's requirements.

Customers

Our policy in respect of customers is available on our website or from Modwenna Rees-Mogg via email at modwenna.rees-mogg@athlacapitalmanagement.com.

Complaints

All employees and workers should treat each other with dignity and respect whilst at work. Our staff handbook outlines the company Grievance process and Harassment and Bullying Policy. We encourage informal resolution and will provide a named independent person to call for help and advice. Currently this person is Mike Rees who can be contacted by email in the first instance at mike.rees@athlacapitalmanagement.com. All complaints will be taken seriously and will be dealt with promptly and confidentially. If an employee or worker is found to have breached the Equality, Diversity and Inclusion Policy, they may be subject to disciplinary action which could result in dismissal.

Members of the public who wish to make a complaint about Athla Capital can do so using our Complaints Procedure which can be found on our website. All complaints will be dealt with fairly and respectfully, regardless of the protected characteristic of the individual making the complaint.

Assistance will be given to people who wish to make a complaint but require support or a different format to do so.

Our approach to equality, diversity and inclusion

Monitoring and Review

We will regularly collect, monitor and analyse diversity data; including information about the gender, age, ethnicity, sexual orientation, religion and belief or disability information provided by employees and job applicants to make sure our employment processes are fair and are achieving the aims of this policy.

We will undertake a formal review of this policy at regular intervals or after significant changes in our business operations or legislation and communicate the changes to those who are bound by this policy.

Recruitment, selection, training, promotion, discipline and dismissal process.

- Our process is fair and open, to enable the selection of best talent. All employees undergo the same recruitment process
- Selection of individuals for an offer of employment is agreed by a unanimous team vote, following interview.
- We budget for and offer in house and external training to all team members.

- Promotion is offered to staff when vacancies occur or when a new role is created. All staff are offered the opportunity to apply for the role.
- How we discipline staff and arrangements for dismissal is laid out in our Staff Handbook and employee contracts.

Monitoring of the diversity of job applicants specifically

The board monitors the diversity of job applicants before candidates are selected for interview. Our approach to selection for interview is as follows:

- Job advertisement states that we are an EDI employer and encourages applications from all.
- % by which candidate meets selection criteria.
- Analysis of diversity of applicants who mostly or completely meet selection criteria and then sort by gender; and ethnicity, disability and orientation (if information available). Note we also welcome older job applicants and those who may be returning to work.
- If diversity of applicants is weak, we may readvertise.
- Selection for interview volumes based on % of numbers of applicants by volumes of applications in different categories.
- Decision on how many candidates we will interview.
- Depending on volumes, if necessary, a random selection of candidates to interview is made.
- Where appropriate match interviewer gender, ethnicity, disability and orientation.
- Prior to interview, review interview questions to ensure that EDI bias not present.
- Post interview, monitor interviewer notes to satisfy no EDI bias in the interview.
- From time-to-time survey interview candidates to confirm no evidence of discrimination in interview.

Equal Pay, Minimum Wage

We are an equal pay and opportunities employer.

We always pay at least minimum wage and for permanent employees the wage reflects the role they perform. We offer internships to Year 12 and Year 13 and undergraduates, typically for a week. These internships are not paid, but we do pay travel & expenses. If you are interested in an internship, please contact modwenna.rees-mogg@athlacapitalmanagement.com.

Victimisation, discrimination and harassment

Our Staff Handbook contains a Grievance Procedure which explains how staff can notify us of accusations of victimisation, discrimination and harassment. It also contains our disciplinary procedures for those accused of victimisation, discrimination and/or harassment.

At weekly meetings with staff and a senior manager, we actively ensure that the employee is not suffering from victimisation, discrimination and harassment and to offer support where they may be facing challenges e.g. due to disability. At bi-annual staff appraisals, we confirm the employee is not suffering from victimisation, discrimination and/or harassment. If there is a concern at such meetings, we agree a plan to address it.

Training in respect of this policy

We offer a training programme for employees, managers, board members and third-party contractors, consultants and suppliers on their rights and responsibilities under the Equalities Act 2010.

Implementation of this policy

This policy is implemented through the Athla Capital Management intranet. Implementation by suppliers, contractors and portfolio companies is achieved through contracts and agreements.