

EDI Policy

August 2023



Statement

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:

- 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.