

# Diversity and equality policy

## Overview

Canaccord Genuity Wealth Limited ('CGWL'), Canaccord Genuity Financial Planning Limited ('CGFPL'), CG Wealth Planning Limited ('CGWPL'), Hargreave Hale Limited ('HHL') and Adam & Company Investment Management Limited ('AIM') are authorised and regulated by the Financial Conduct Authority ('FCA'). Collectively these regulated companies are known as 'Canaccord Genuity Wealth Management' ('CGWM UK') or the 'Company'. As part of CGWM UK, CGFPL, CGWPL, HHL, AIM are subject to the same standards as CGWL.

## Principle

This Company exists within a changing business and social environment. As the profile of the local population becomes more diverse, the Company aims to provide opportunities for people to exercise their individual rights, gain access and contribute to the Company.

The Company recognises the contribution and creative potential that employees and potential employees, of differing backgrounds, skills and abilities bring to the workplace. It therefore makes sense for the Company to ensure that all applicants and employees receive fair and equal treatment irrespective of race, colour, nationality, ethnic or national origin, religion, gender or sexual orientation, marital or family status, gender reassignment, disability, trade union membership and non-membership or political opinion (this is not an exhaustive list) subject to the constraints of other policies and legislation.

Discrimination in employment happens as a result of prejudice, misconception, and stereotyping which in turn hinders the proper consideration of an individual's talent,

skills, abilities, potential and experiences.

It can be direct or indirect, intentional or unintentional. What is most important is that certain forms of discrimination are not just unfair – they are illegal.

Every possible step will be taken to ensure that all individuals are treated equally and fairly and decisions on recruitment, selection, terms and conditions, benefits, training, development, promotion, performance and appraisal activities are based solely on the individual's ability to do the job.

In keeping with the spirit of this policy all individuals involved with the Company will be expected to value each other and to treat each other with respect and dignity. In order to understand the relevance of the Policy, and to support its effective application, a number of issues must be understood.

- Prejudice is inherent within individuals and society, but often not recognised; employment practices must manage the treatment of people in order to challenge and change attitudes in order to eliminate any unfair discrimination.
- Discrimination occurs when an individual is treated less, or more favourably, than others due to a particular characteristic they have. Discrimination can be based on any prejudice held by the person exercising power over the treatment of another.
- Assumptions can be made on the likely behaviour and potential performance of an individual. These preconceptions are based on stereotypes of groups with such characteristics. Discrimination means that an individual does not have an opportunity to provide the personal factual evidence needed in order to receive fair and equal treatment.

Management in particular has a responsibility to understand and promote the policy.

## Employee's responsibilities under the policy

Whilst overall responsibility for the effective operation of this policy lies with the Company, all employees, whatever their position are responsible for ensuring its effective implementation.

Employees can be held personally liable for any unlawful acts of discrimination. In this respect, employees should ensure that they:

- Co-operate with any measures introduced by the Company to promote equal opportunities in the workplace;
- Refrain from taking any actions or decisions which are contrary to the letter or spirit of this policy;
- Do not harass, victimise or otherwise discriminate against other employees, potential employees or customers;
- Do not instruct or pressurise other individuals to act in breach of this policy; and
- Advise their manager if they are aware of any discriminatory conduct, either against themselves or any third party contrary to the spirit of this policy, so that the Company can take steps to deal with any concerns at an early stage.

## Procedure for complaints

The Company believes that any form of discrimination is unacceptable and this policy sets out to raise awareness of expected standards of behaviour and to reassure employees that any complaints of this nature will be taken seriously, investigated and if found to be positive this may lead to disciplinary action.

Any employee who believes that they have suffered any form of discrimination is entitled to raise the matter through the Company's grievance procedure as set out in the Employee Handbook.