

Zennor Equal Opportunities Policy

This document sets out the equal opportunities and anti-harassment policy of Zennor Asset Management LLP (“Zennor” or “the Firm”). Zennor is committed to providing equal opportunities to all employees and potential employees. All employment decisions are based on merit and the specialist needs of the Firm and are regardless of age, disability, gender, gender reassignment, marital status, pregnancy and maternity, race (including colour, nationality and ethnic origin), religion, sexual orientation or any other characteristic protected by the Equality Act 2010. This applies to all employment whether temporary, part-time or fulltime.

The policy governs all aspects of employment, including but not limited to, recruitment, pay and other forms of benefit and compensation, selection for training, promotion or demotion, dealing with grievances, discipline, leave for parents, requests for flexible working, redundancy or termination of employment. The principles also apply to the treatment of clients, visitors and former employees.

Zennor is committed to providing a working environment which is free from bullying, harassment and discrimination and in which all individuals are treated with dignity and respect. “Inappropriate behaviour” is any kind of misconduct which is unwanted and personally offensive to the recipient and which causes the recipient to feel threatened, humiliated, patronized or distressed. Non-exhaustive examples of inappropriate behaviour include abusive language, “jokes” or name calling about sex, race, religion or disability; display of offensive written or visual material; open or covert hostility on the grounds of race, gender, religion, sexual orientation or disability. The Firm will not tolerate inappropriate behaviour and will immediately tackle any instances of its occurrence. This may include taking disciplinary action against the perpetrator.

All employees also have a moral and legal obligation not to discriminate against, and to treat with dignity and respect, all other employees, clients or any other person with whom the Firm does business. Consequently, there will be no harassment, abuse or intimidation on grounds of the characteristics protected by the Equality Act 2010 and language or humour that people find offensive will not be used. Breach of this obligation will be a disciplinary matter.

Any employee who has questions about this policy or who has concerns about any type of discrimination should bring these concerns to the attention of James Salter. Where they consider it necessary, they will inform the Management Board of the concerns raised. The Management Board will then be responsible for promptly convening a meeting of all the directors at which the concerns can be aired, and appropriate action taken. All concerns will be taken seriously and can be raised without fear of reprisal.

The policy will be reviewed when necessary to ensure fairness and to consider changes in the law.

Zennor Asset Management LLP

January, 2022