

# **Equality, Diversity, and Inclusion Policy**

Clipstone Investment Management Limited ("CIML" or "the Company") is committed to promoting a diverse and inclusive working environment where there is equal opportunity and proper consideration for the wellbeing of its employees, and to eliminating unlawful discrimination.

The Company treats its employees and potential employees respectfully, fairly and equally, free from unfair bias relating to the Equality Act [2010] protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity or paternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation.

CIML promotes equal opportunities in terms of recruitment, promotion, job assignment, remuneration, benefits and services, flexible working, redundancy, discipline, and dismissal. In addition, it encourages the continuous development and training of all its employees.

Although the Company has a responsibility to implement this policy, we have a shared responsibility to enforce it and it is built on the following principles:

- Treat everyone with respect, consideration and without prejudice.
- Respect other's privacy, dignity, and preferences.
- Be sensitive to other's age, disability, sex, sexual orientation, gender identity and expression, marriage and civil partnerships, race including colour, nationality, ethnic or national origin, pregnancy or maternity, religion or belief whether it is known or perceived or due to an association.
- Avoid making assumptions and/or stereotyping others with respect to these matters
- Avoid making derogatory and/or discriminatory comments, jokes or remarks, which may isolate and hurt others.

#### Our commitment:

- We will not tolerate any kind of discrimination, harassment, bullying, victimisation, or any
  other conduct which causes any employee, worker, job applicant, ex-employee, client,
  supplier, or visitor to be distressed.
- We will make all written policies, procedures and practices on equal opportunities and antidiscriminatory practices available to everyone and will communicate any changes or developments.
- We will review and address the training needs of managers and employees to ensure that both parties promote equal opportunities and anti-discriminatory practices in the workplace and have sufficient knowledge and understanding of our policies, procedures and practices, to avoid unlawful and unacceptable discrimination.
- We will measure effective performance in a role by focussing on achievement of objectives aligned to the skills, experience, knowledge, and behaviour required to undertake the role. Employees and candidates will be assessed objectively against these requirements.
- All requests for variations to standard working practices will be considered on a case by case basis in the context of the business and will be declined only if we have reasonable grounds that are unrelated to any protected characteristic.
- We will provide support to anyone at CIML who is subjected to unlawful or unacceptable discrimination, harassment, victimisation or bullying in the course of their employment or association with us.
- We will seek to resolve any informal or formal complaint via the Company's employee grievance process, and this includes but is not limited to mediation and counselling.



- We will ensure that acts of discrimination, harassment, bullying or victimisation against employee, worker, job applicant, ex-employee, client, supplier or visitor and any complaints are taken seriously and are dealt with appropriately.
- We will make reasonable adjustments and take steps to avoid placing a disabled person at a substantial disadvantage due to any arrangements made by us or the physical nature of the work premises.
- We will comply with the requirements of relevant legislation and this policy will be updated accordingly in line with developments to legislation.
- We will collect data where appropriate to enable us to monitor our performance in respect of this policy.

CIML employees are expected to assist us in meeting our commitment to provide equal opportunities, dignity in employment and avoid discrimination. Staff must not discriminate unlawfully, violate the dignity, harass, bully, or victimise any employee, worker, job applicant, exemployee, client, supplier or visitor. Our employees are aware that any discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice. In addition, staff can be held personally liable for any act of unlawful discrimination as well as, or instead of, us and serious acts of harassment may constitute a criminal offence.

CIML requires all its employees to adhere to and promote this policy and ensure that all third parties that they deal with through the course of their employment are treated on a similar basis. Staff should refer to the Employee Handbook for how we define discrimination and harassment and bullying.

## **Hiring Process**

For all new hires, we will ask that recruitment consultants aim to provide a candidate shortlist containing at least 50% suitable female candidates, and at least two suitable BAME candidates. Where the recruitment consultant is unable to achieve this aim, they will be required to provide, in writing, reasons why. Where shortlists contain four or more suitable women, at least 50% of candidates selected for interview will be female, otherwise all women on the shortlist will be interviewed.

#### **Employee Support and Grievance**

The Company has a process in place to address circumstances where an employee believes that this policy has been breached or that their rights have been violated.

Employees can voice concerns (in confidence) to Toby Dean (CEO), or the Compliance Officer (Bill Arnold). Where the employee feels that this route is inappropriate or has not resolved the matter, they are able to write a letter of formal complaint to the Compliance Officer and a thorough investigation will be carried out as quickly as possible to resolve the issue.



### **Clipstone Industrial REIT plc**

Clipstone Industrial REIT plc ("the REIT"), has no employees other than its directors. Directors can be appointed by the Members of the REIT by ordinary resolution, or by the board, however directors appointed by the board must be re-appointed by ordinary resolution at the next annual general meeting. In practice, The Board will make recommendations to the Members to appoint (or remove) directors from time to time. While the members may reject such a resolution, it is the responsibility of the Board to ensure that the diversity of the Board is considered when proposing appointments of directors. The REIT's Board is committed to following this Equality, Diversity, and Inclusion policy when making future appointments.

#### Responsibility for implementation

The Board of CIML has overall responsibility for ensuring that the Company promotes a Diverse and Inclusive working environment. Richard Demarchi (Finance Director) oversees the implementation of this Policy.