

Diversity & Inclusion Policy

1 Introduction

- 1.1 To enable us to achieve our business objectives, create better cultural awareness and promote understanding and better communication, a diverse workforce is essential.
- 1.2 Diversity helps us to achieve a competitive advantage by expanding and developing the pool of talent on which we can draw. Growth depends not only on the ability to attract the best workforce but also to foster, support and retain our current employees. We work with diverse clients, and a workforce that is representative of our clients promotes a better understanding of their business needs.
- 1.3 We are committed to providing equal opportunities in employment and to providing a workplace which is free from discrimination and harassment. This means that all job applicants, employees, agency workers, consultants, partners and third parties who come into contact with us, will receive equal treatment regardless of age, disability, gender identity, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex and sexual orientation or other personal characteristic.
- 1.4 We have an Equality, Diversity & Inclusion (EDI) committee which meets quarterly and is comprised of Equity and Salaried Partners, Head of Compliance and representatives from HR and Business Development. The purpose of the committee is to reflect, discuss and promote the improvement of EDI within our business.
- 1.5 Diversity and Inclusion is also a standing agenda item at the monthly Compliance meetings and at our Operations Board meetings. It is considered at every level to ensure that we recruit, retain, and promote the best people, irrespective of their background, to meet our current and future business needs. We also require all our substantive suppliers to demonstrate their commitment to diversity and inclusion.

2 Scope

- 2.1 This policy applies to all current and potential employees, consultants, agency workers, partners, clients, and suppliers.
- 2.2 It covers all aspects of employment: recruitment and selection, training and development, performance management (appraisals), reward and promotion, terms and conditions of service and termination. Decisions relating to any of these will be based solely on capability, conduct and overall performance.

3 Leadership

- 3.1 The Equity Partners, the CEO, the Head of Compliance, and the Head of HR provide leadership for Devonshires on Diversity matters. They are ultimately responsible for overseeing, assessing, and making recommendations in this area. They review this policy on an ongoing basis to reflect changes in the law, demographics, and business needs.

- 3.2 Whilst they will drive diversity within the Firm, it requires everyone's commitment and co-operation to ensure it continues to be successful.

4 Implementation and compliance

- 4.1 All employees, agency workers, consultants and partners are responsible for the promotion and advancement of this policy.
- 4.2 Behaviour which transgresses this policy will not be tolerated and will be dealt with in line with our disciplinary policy (or an alternative process where the disciplinary policy does not apply to the person). If necessary, the grievance procedure (or alternative) may need to be implemented where a complaint is raised.
- 4.3 It is a condition of employment that all employees must abide by this policy, and any breach will be deemed gross misconduct under the Firm's disciplinary procedure. Non-employees who breach this policy will have a similar appropriate sanction applied.
- 4.4 Advice on diversity is available from the HR team.

5 Monitoring

- 5.1 To ensure this policy is operating effectively (and for no other purpose) and to the extent it is lawful and possible, we maintain records of all applicant and employee details relating to age, disability, gender identity, marriage and civil partnership status, race, religion or belief, sex, sexual orientation and socio-economic background. This statistical data is used to provide ongoing assessments of our workplace profile and is treated in the strictest confidence. All employees and applicants are asked to provide this data and for each question asked, there is an option for individuals to choose not to answer.
- 5.2 We benchmark the composition of our workforce against diversity statistics for City of London, Greater London, and the UK, as well as the SRA Diversity Tool.
- 5.3 Our statistical profile is updated every six months, and the results are published on our website and on our intranet.

6 Discrimination and harassment – legal context

- 6.1 It is unlawful to discriminate, directly or indirectly, in respect of a person's age, disability, gender identity, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation. It is also unlawful to cause harassment to someone where it relates to certain protected characteristics, or to victimise someone for taking any action in relation to equality rights. Our Dignity at Work Policy provides more information about these concepts. Breach of anti-discrimination legislation may result in both employees, consultants, partners, and the Firm becoming involved in criminal and/or civil proceedings.
- 6.2 Every employee, consultant, partner, and agency worker has the right and is encouraged to report any incident of discrimination or harassment. All complaints will be treated confidentially and investigated thoroughly. Discrimination which is unlawful because of its connection with a protected characteristic or which is connected with some other

personal characteristic that is not covered by the Equality Act but would be unlawful if it was, harassment and bullying will not be permitted or condoned; such actions are deemed to be gross misconduct under our disciplinary procedure. Non-employees who breach this policy will have a similar but appropriate sanction applied. Such actions are a direct breach of an individual's contract with us.

7 Recruitment

- 7.1 Recruitment of all employees, consultants, and partners, is conducted in a systematic way which enables us to select the most suitable candidates.
- 7.2 Formal procedures exist for short-listing, testing, and interviewing so that applicants are assessed based on their skills, abilities, experience, and knowledge alone.
- 7.3 We welcome applications from groups where we are currently under- represented.

8 Training

- 8.1 All our employees, consultants and partners receive regular mandatory diversity training from an external provider.
- 8.2 This training is delivered biennially or more frequently if there are changes in the law. All new joiners receive diversity training as part of their induction from an external provider. It is a contractual requirement that all employees, consultants, and partners complete this training when invited to do so.

9 Promotion and opportunities

- 9.1 Decisions relating to promotion and work-related opportunities are based on merit and ability alone. Decisions are made without regard to age, disability, gender identity, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex, sexual orientation or other personal characteristic.

10 Reward

- 10.1 Salaries are reviewed on an annual basis, as determined by individual and Firm performance along with a consideration of market rates and economic performance within the sector. The HR team monitor salary reviews to ensure that pay increases are applied consistently and fairly across the practice.

11 Professional dealings

- 11.1 Employees, agency workers, consultants and partners must not in their professional dealings with current or potential employees, agency workers, consultants, partners, clients, suppliers, or other third parties, discriminate against any person, nor harass them, on the grounds of age, disability, gender identity, marriage and civil partnership status, race, religion or belief, sex, sexual orientation, or any other personal characteristic, nor victimise them.
- 11.2 Whilst we are generally free to decide whether to accept instructions from a client, we must not refuse to act for them on any unlawful grounds. We must also ensure that, when

instructing a barrister, we and/or any person assisting us with our choice of barrister, do so based on skill and ability rather than on any unlawful ground. If a client's choice of barrister is based on an unlawful ground, employees and other partners must immediately refer this to their supervising partner who will carefully discuss this with the client.

- 11.3 Anyone who becomes aware that the behaviour or practice of a client or supplier is or may constitute discrimination or harassment [on one of the Equality Act grounds], should notify their supervising partner/line manager and the Head of Compliance who will investigate and consider appropriate action in the circumstances.
- 11.4 The Firm will not tolerate such behaviour as outlined in 11.3 above on the part of its clients or suppliers.
- 11.5 Should any client or supplier be unwilling to take appropriate action to address concerns which the Firm brings to their attention in this regard, we will consider the nature and extent of our future working relationship with them.
- 11.6 It is important also to establish whether a third party is disabled to ensure that in our dealings with them, they are not disadvantaged in any way and that appropriate adjustments are made to accommodate them in a similar way to that in which we would do for an employee. Adjustments may include, e.g., printing documents in a larger typeface or employing the services of a sign language interpreter at seminars.

12 Disciplinary and grievance procedures

- 12.1 Acts which following investigation we reasonably believe to constitute discrimination, victimisation, or harassment on grounds of age, disability, gender identity, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or other personal characteristic by employees, agency workers, consultants or partners of the Firm will result in disciplinary (or similar) action. Failure to comply with this policy will be treated in a similar fashion.
- 12.2 We will treat seriously and take action when an employee, agency worker, consultant or partner raises a grievance or complaint of discrimination and/or harassment on any grounds.
- 12.3 Please refer to the Disciplinary and Grievance Procedures, or our Complaints Procedure, whichever is applicable for further information.
- 12.4 Any breach of this policy is admissible in evidence in disciplinary proceedings conducted by third parties such as the SRA/Solicitors Disciplinary Tribunal.

13 Monitoring and review of the policy

- 13.1 This policy is reviewed and amended periodically by the HR team.