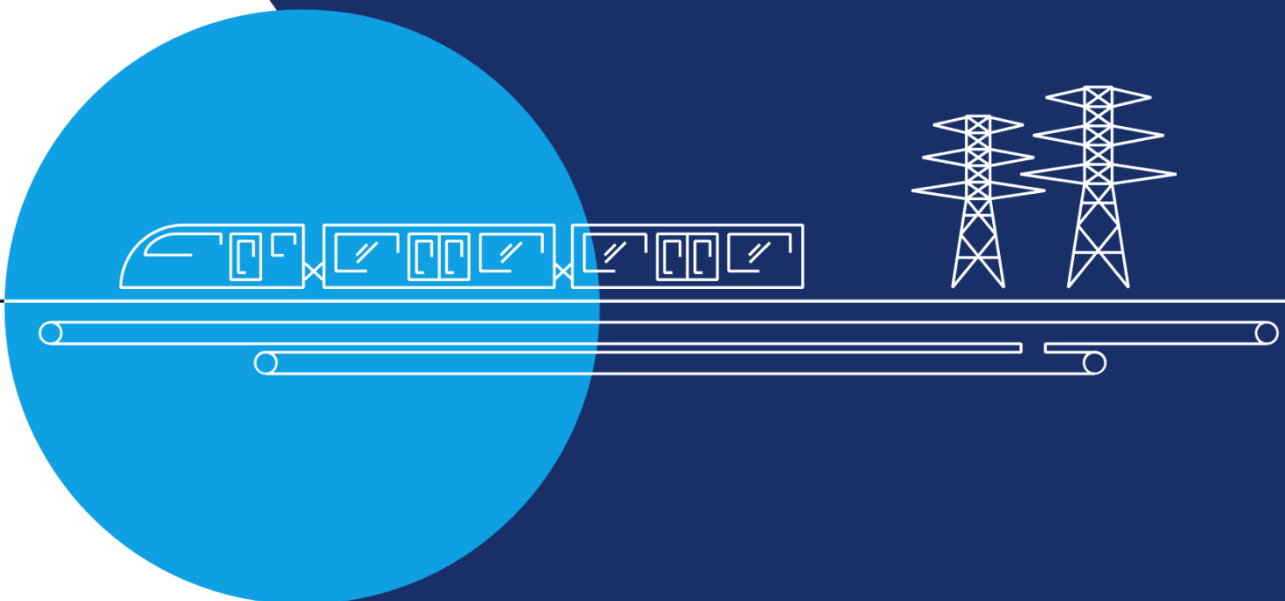




Equality, Diversity, and Inclusion Policy

2025



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Policy Name Here	
Policy Owner:	Human Resources Sustainability
Policy Approver:	Executive Committee
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PREFACE

Dalmore Capital ("Dalmore") is committed to creating an inclusive and welcoming work environment for all employees. Championing diversity and eliminating prejudice at work is fundamental to our values. We strive to ensure equal opportunities for all staff and job applicants and a safe working environment.

Every employee is respected, valued, and supported to achieve their best.

Through our Equality, Diversity, and Inclusion (EDI) policy, Dalmore will continue to guide leaders, managers, and employees to uphold these principles in their daily roles and duties.

PURPOSE

The purpose of this policy is to outline Dalmore's approach to EDI in accordance with the UK Equality Act 2010. Dalmore is committed to promoting equality and diversity and fostering a culture that values differences. We recognise that individuals from diverse backgrounds and experiences bring valuable insights that enhance our workplace and the way we operate.

This policy reaffirms Dalmore's commitment to treating everyone equally and fairly and doing all that we can to prevent any form of discrimination, harassment (including sexual harassment), bullying or victimisation.

SCOPE & APPLICABILITY

The rights and obligations set out in this policy apply equally to all employees, whether part-time or full-time, on a substantive or fixed-term contract, and to associated persons such as secondees, volunteers (interns/placements), agency staff, contractors, and others employed under a contract of service ("Staff").

This policy applies to all conduct in the workplace and also to conduct outside the workplace that is related to work (e.g., at meetings, work social events, and social interactions with colleagues) or which may impact Dalmore's reputation (e.g., the expression of views on social media, contrary to the commitments expressed in this policy). Set out below are some specific areas of application:

- **Recruitment:** Dalmore seeks to ensure that talent is sourced from a wide and diverse pool. All suppliers involved in the recruitment process are required to adhere to this principle. Selection for employment at Dalmore will be based on aptitude and ability. Where possible, Dalmore will capture applicants' relevant diversity demographics as part of its recruitment processes to promote the elimination of unlawful discrimination.
- **Training:** Training concerning EDI matters will be provided to all employees including line managers and others likely to be involved in recruitment, performance management, talent management, and other decision-making processes.
- **Promotion:** All promotion decisions will be made based on merit and will not be influenced by any of the protected characteristics. Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.
- **Pay/Remuneration:** Pay and remuneration practices at Dalmore will be reviewed regularly to ensure they are fair, competitive, and free from bias. Compensation will be determined based on role, responsibility, performance, and market factors, ensuring equality for all employees regardless of any protected characteristic.
- **Employment:** The benefits, terms and conditions and facilities available to Staff will be reviewed regularly to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the needs of disadvantaged or under-represented groups.

GOVERNANCE

The HR Director shall be the owner of this Policy and will work with Staff to ensure consistent application of this policy by ensuring that:

- All policies comply with and reflect the spirit of EDI legislation and industry guidelines and good practice.
- Dalmore's behaviours and values and the application of these by Staff demonstrates openness, inclusion, and diversity.
- Appropriate guidance and training are provided to Staff to take responsibility for their own behaviours and where applicable, to manage appropriately the behaviours of line reports.
- Regular reviews and development of this policy occur, and that any amendments or updates remain consistent with EDI principles and good practice.

All Staff at Dalmore have the following responsibilities with respect to adhering to the EDI Policy:

- Actively encourage non-discriminatory practices and report any incidences of behaviour that fail to comply with this Policy.
- Be aware of and support this Policy in carrying out their duties.
- Treat fellow Staff, job applicants, associates, and clients with respect and without discrimination or harassment
- Raise any concerns regarding inappropriate behaviour with their line manager or Human Resources.
- Undertake appropriate EDI training.

WHAT CAN BE REPORTED AND HOW?

Dalmore is committed to promoting EDI in the workplace and will not tolerate any acts of unlawful or unfair discrimination (including harassment and bullying) committed against an employee, contractor, job applicant, client or visitor because of a protected characteristic, as defined under the UK Equality Act 2010:

- | | |
|----------------------------------|---|
| • Age | • Race (including ethnic or national origin, colour, and nationality) |
| • Disability | • Religion or belief |
| • Gender reassignment | • Sex |
| • Marriage and civil partnership | • Sexual orientation |
| • Pregnancy and maternity | |

In addition to these protected characteristics, discrimination based on work patterns (e.g., part-time working, fixed-term contracts, flexible working), caring responsibilities, family circumstances, gender expression, or socioeconomic background will also not be tolerated.

If anyone at Dalmore believes that they have suffered discrimination/harassment/bullying due to any of the above protected characteristics, they should use one or more of the below routes to raise their concerns.

RAISING CONCERNS

If a Staff member has experienced or witnessed unequal treatment, harassment, bullying or discrimination, they should raise their concerns at the first opportunity.

This can be with their line manager, another senior manager, or Human Resources. If the Staff member wishes to make a complaint about their employment or how they have been treated, they should review Dalmore's Anti Bullying and Harassment Policy and Grievance Policy. These are available on the Dalmore portal or from Human Resources directly.

Additionally, Dalmore's Speak Up Policy may be used to report any misconduct, breaches of any laws or internal policies. This is also available on the Portal, or from Human Resources or Compliance.

BREACH OF THIS POLICY

Any person who is found to have breached this Policy shall be subject to disciplinary action, up to and including dismissal.

MEASURING POLICY EFFECTIVENESS/MONITORING

We will measure the effectiveness of this policy by:

- Collecting and reviewing quantitative and qualitative data including:
 - Diversity demographics.
 - Recruitment and selection of Dalmore employees.
 - Complaints, linked to the range of protected characteristics, including harassment, bullying, and grievances proceedings for employees and guests.
 - Employee EDI training attendance and understanding.
- Sharing relevant information with internal committees, investors, and other stakeholders, as appropriate.

To ensure that this policy and other procedures are operating effectively, Dalmore's HR Director will continue to monitor and measure performance and ensure that any patterns or trends are identified and resolved.

This policy will be reviewed annually to ensure that equality and diversity is continually promoted in the workplace.

