

GEORGIA CAPITAL PLC DIVERSITY POLICY

INTRODUCTION

Georgia Capital PLC (the **Company**) is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the organisation. The Board embraces diversity in all its forms. Diversity of skills, social and ethnic background, nationality, experience, cognitive and personal strengths, knowledge, outlook, approach and gender, amongst other factors, will be taken into consideration when seeking to make any new appointment within the business, whether an employee, client, supplier or contractor. Diversity is not always an easily measured characteristic, such as gender. Diversity of outlook and approach is hard to measure but may be equally as important.

Employees and job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or registered civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex or sexual orientation.

All employees are responsible for the promotion and advancement of, and compliance with, this diversity policy (the **Policy**). Behaviour, actions or words that transgress the Policy will not be tolerated and will be dealt with in line with the disciplinary policy. This Policy does not form part of any employee's contract of employment.

RECRUITMENT AND SELECTION OF EMPLOYEES

The recruitment and selection process is crucially important to our Diversity Policy. We will endeavour, through appropriate training, to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions. All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate.

Job descriptions will be in line with this Policy and job requirements will be reflected accurately in any personnel specifications. We will adopt a consistent, non-discriminatory approach to the advertising of vacancies and we will take steps to advertise vacancies to a diverse labour market. All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do the job.

Short listing and interviewing will be carried out by more than one person where possible. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

DURING EMPLOYMENT

Diversity will be integrated into all mainstream training and development programmes.

All decisions regarding promotion and development of individuals will be made on merit and within the overall framework and principles of this Policy.

If an employee is disabled or becomes disabled, we encourage them to tell us about their condition so that we can consider what reasonable adjustments or support may be appropriate.

BOARD

As with any selection process, all Board appointments will be made based on merit. However, the Board adopts this Policy for their own selection and recruitment process.

BREACHES OF THIS POLICY

The Company takes a strict approach to breaches of this Policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

Grievances related to this Policy should be raised with Human Resources, your immediate supervisor or the Chief Compliance Officer. Making a deliberately false allegation will be treated as misconduct and subject to appropriate disciplinary action, including up to dismissal.

MONITORING AND REPORTING

The Company's Annual Report includes a separate report from the Nomination Committee describing its work, including the process followed in respect of Board appointments and how this Policy has been applied.

REVIEW OF THE POLICY

This Policy will be reviewed by the Nomination Committee on an ongoing basis to reflect changes in the law, demographics and internal business requirements, and can be amended at any time. The effectiveness of the Policy will be reviewed annually by the Nomination Committee.

The Nomination Committee will consider any revisions required and recommend any changes to the Board for approval.

Dated on 6 December 2019