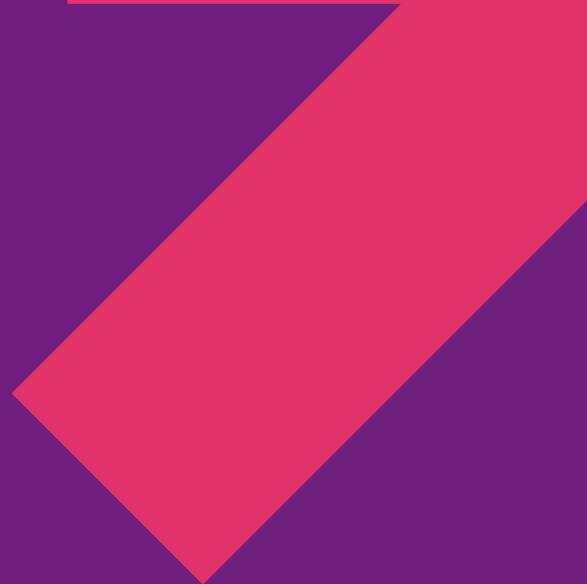
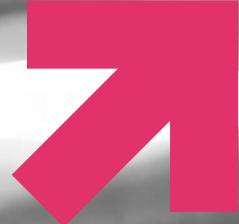


E V E R S H E D S  
S U T H E R L A N D



**Equality and diversity**  
International policy

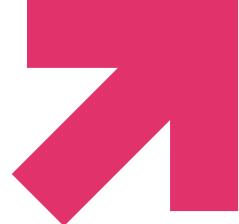


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# Introduction

Eversheds Sutherland is committed to developing a diverse team and an inclusive culture that places respect and support for everyone at its core.

As a responsible business, we recognise that a culture of inclusion, where each person feels able to be their true self at work and where everyone can thrive, is key. We look to bring together different skillsets, global mindsets and approaches. We foster diversity of thought and the freedom to put ideas into action, and we have an inherent respect for the individual. All of our internal policies and practices support this vision.

## Diversity characteristics

Each jurisdiction has discrimination law containing a distinctive set of prohibited grounds which differ from country to country. At Eversheds Sutherland, we operate high standards of equality and diversity and will therefore not discriminate on the following prohibited grounds, known internally as diversity characteristics:

- age
- gender reassignment/expression/identity
- parental or caring responsibilities
- pregnancy or maternity
- religion or belief
- sexual orientation
- trade union, works council or collective bargaining unit membership (or non-membership)
- disability
- marital status
- political ideology or affiliation
- race (including ethnicity, nationality, skin colour)
- sex
- socio-economic or educational background

It is also important to recognise the following:

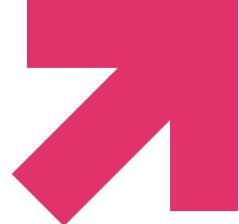
- the above list is in no particular order and does not imply level of importance
- the above list does not replace legislative prohibited grounds but instead provides common Eversheds Sutherland standards across all jurisdictions
- each jurisdiction may include any other diversity characteristic, if there is legal reason to do so

We have five **People Networks** which are open to all and help provide information and support:



Colleagues do not need to identify personally with the specific diversity strand(s) represented by each network; we encourage all colleagues to join to build their awareness and understanding of the experiences of others.

Further information on our diversity and inclusion approach and activity can be found on the **Diversity and Inclusion** pages of Insite.



# Our values

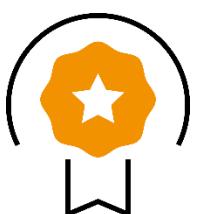
We live our values; we're purposeful and purpose-led with an inherent respect for the individual. This document reflects our values:



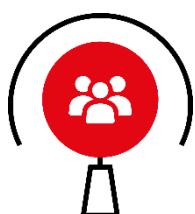
**Collaborative**



**Creative**



**Professional**

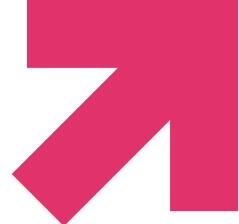


**Inclusive**



**Open**





# Purpose and scope

## Purpose



The purpose of this document is:

- to provide an environment in which everyone is respected for who they are and the contribution they bring to our international business and to our clients
- to position Eversheds Sutherland as an inclusive employer, and attract and recruit diverse talent through an inclusive hiring approach
- to ensure we empower our people to fulfil their potential through our systems, processes and the programmes we offer
- to provide mechanisms for people to share their feedback and any concerns confidentially, in an environment which is free from any form of discrimination, harassment or bullying

## Scope

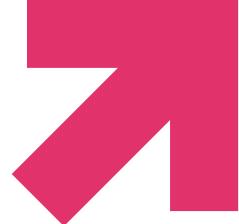


This document applies to everyone within Eversheds Sutherland in all international jurisdictions and includes partners, fee earners and support teams, permanent employees, fixed term and temporary employees, trainees, work experience students, secondees, agency workers, contractors and consultants. For ease, such people are referred to as 'colleagues'.

This document applies at work, whilst fulfilling normal work duties (including working from home or in an Eversheds Sutherland office, at client meetings and during business trips), at work-organised and work-related events and in some cases, in colleagues' private lives including via the use of social media.

This document is non-contractual and we reserve the right to change this document from time to time without prior notice.

This document does not supersede local employment laws and any legislative provisions will be adhered to.



# Strategic approach

Our Global Diversity and Inclusion ('D&I') strategy is aligned with our Business strategy and People strategy across our international business.

Six pillars guide our strategic D&I planning:

- leadership and accountability
- evaluating our progress
- balancing global and local
- recruitment of diverse talent
- awareness and career support
- clients and collaboration

We are committed to creating a working environment which supports our purpose and values and which is free from any form of discrimination, harassment or bullying, and within which all colleagues are treated with respect, fairness and courtesy.

We seek to embed D&I into our everyday behaviours, processes, systems and activities. This is part of our business as usual activity and our standard way of working with colleagues, clients, suppliers and business parties.

We define goals and targets, and we review and measure our progress and impact in relation to three levers: recruitment, promotion, retention.

## Terminology

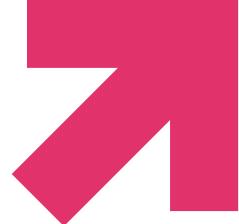
- **diversity** is about valuing, recognising, understanding and embracing difference. We all have our own perspectives, knowledge and experiences and diversity is appreciating the uniqueness of individuals
- **inclusion** is about building an environment and culture where every individual or group of people feel that they belong, can participate and are valued for their contribution, experience and perspective. An inclusive environment aims to remove existing barriers, discrimination and inequality

- **equality** is about creating a fairer society where individuals or groups of people are treated with dignity, respect and without discrimination and where no one is treated less favourably
- **inequality** is unequal access to opportunities
- **equity** is ensuring everyone has access to the same opportunities. It is about recognising the advantages and barriers that exist for certain individuals and groups of people and the commitment to correct and address those imbalances. It is about fairness and providing people with the resources they need
- **intersectionality** is an analytical framework for understanding how aspects of a person's social and political identities combine to create different modes of discrimination and privilege. Intersectionality identifies multiple factors of advantage and disadvantage
- **belonging** is a product of an inclusive environment, where people feel respected for who they are and able to be themselves

## Governance

Our progress and impact in relation to D&I is regularly measured and monitored, reported to the Board, and communicated internally and, where appropriate, externally.

Our international D&I Partner Sponsor leads the Inclusion Council which meets quarterly. The Inclusion Council is comprised of senior leaders from across our business teams and international offices who meet to discuss relevant D&I topics, progress and challenges. This helps shape our D&I strategic approach and interventions.



# Strategic approach (continued)

## Your responsibility

D&I is not the sole responsibility of the firm's senior leadership team or the D&I team. It is everyone's responsibility to ensure our D&I principles and behavioural standards are implemented. Any breach of this document may be subject to disciplinary or alternative appropriate action through our internal procedures. The D&I principles and behavioural standards apply not only when you are working on our premises or at those of any client or contact, but also at work-organised or work-related social events, hospitality events, when travelling or staying away from home whilst on business and in some cases, in private lives.

We will support and encourage our colleagues in their responsibility to implement this document by providing training, information and expert guidance, and through our policies, guidance and processes, as appropriate.

## Diversity characteristics

This document is developed with due regard for the legal obligations in respect of diversity characteristics which are protected from discrimination in the jurisdictions in which we operate.

**Please refer to local legislation and internal documents as appropriate for further details of the current provisions in your jurisdiction.**

Our approach to D&I is consistent with our values and extends beyond the diversity characteristics which are protected in law. Our vision is to be truly diverse, with an inclusive culture that places respect and support for everyone at its core and empowers all of our colleagues to fulfil their potential.

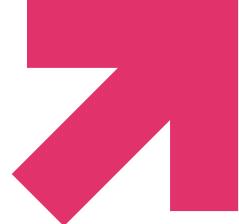
We recognise there are many facets of diversity, and the way they intersect shapes our individual identity, preferences, thinking and behaviours. These diversity characteristics are set out at the beginning of this document.

Whilst building a culture of inclusion for all, we recognise that some groups may have greater challenges to overcome. Therefore we have a focus on certain priority strands of diversity. Strands are firmwide, but each region and country will have specific nuances that are aligned to their culture, context and local practices.

Our diversity strands are:

- Gender
- LGBTQ+
- Ethnicity
- Disability
- Socio-economic diversity
- Parents and carers
- Faith





# Putting it into practice

Our D&I principles and behavioural standards are embedded in our day-to-day activity and in our interactions with colleagues, clients, suppliers and others with whom we come into contact in the course of our business.

## Recruitment

The recruitment of diverse talent is one of the six pillars of our Global D&I Strategy. As part of our inclusive hiring approach, we expect all of our colleagues to show respect and to evidence inclusive behaviours and practices in their interactions with candidates through the recruitment process.

Our Emerging Talent, Experienced Recruitment, and Partner Hiring teams follow an 'inclusive hiring' approach – this means that they are intentional about being inclusive throughout the process – from job definition through to offer acceptance. This impacts our interactions with candidates, hiring managers and third party providers.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the vacancy and will be drawn up before the recruitment process begins. However, if there is a genuine and lawful reason for limiting the vacancy to a particular group, this reason and the grounds for it will be clearly stated on any advertisements.

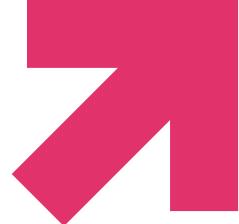
When working with third party suppliers to source talent we set out our expectations of them in relation to D&I.

We ensure that information about job opportunities is circulated as widely as possible, where reasonable and appropriate, to reach a wide cross-section of potential applicants with relevant skills and experience in the market. All applications are welcome and are considered for selection on the relative merits of the candidate against the job and/or person specification and/or objective criteria for the position, regardless of diversity characteristics. We will not ask candidates unlawful questions during the selection process.

We may invite applications from internal candidates including colleagues whose job may be at risk of redundancy or who require redeployment (for example, for health or disability reasons) before advertising the vacancy more widely.

Where applicants are asked to share information about their diversity profile, responses are kept separate from all other application documents and will not form part of the assessment and selection process, other than where our monitoring and control procedures are designed to ensure equality of opportunity and treatment. Data is reported in aggregate only for monitoring purposes. Data is used to help identify barriers to conversion as we monitor progress of different groups of people through our recruitment process.





# Putting it into practice (continued)

## Learning and development

We aim to provide everyone with the appropriate learning and development opportunities to enable them to build their knowledge, skills and experience, and reach their potential.

Opportunities for learning and development are available to everyone based on role/needs of the job and to support their professional and personal development.

We recognise that people from under-represented groups may not have the same access to career opportunities as other colleagues. We therefore provide targeted programmes, such as mentoring and sponsorship arrangements, to help provide focused support for under-represented groups and enable career progression on an equitable basis. We provide learning materials and opportunities in a variety of formats to make it as easy as possible for colleagues to access resources when they need them.

We encourage all our colleagues to engage in quality conversations with their line manager around their development and career management as part of our performance approach.

## Career advancement and progression

We aim to provide everyone with opportunities to help and support them through all stages of their career. These include a range of 'on the job' experiences including secondments, quality work assignments, stretch client roles, coaching and mentoring.

Promotion within Eversheds Sutherland is based on merit and the reasonable requirements of the job. Regular career conversations are encouraged and supported through our performance approach.

The breadth of diversity across our firm is a strength and we are keen to reflect this in all senior leadership appointments. Job descriptions set out the requirements and expectations of each

role, and leadership vacancies are opened up as appropriate to the partnership. Some appointments have a term which helps ensure that diverse partners have greater opportunity to gain wider leadership experience and development opportunities.

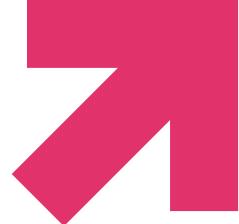
## Terms of engagement

We seek to ensure that terms and conditions of employment/engagement are free from all forms of direct and indirect discrimination and apply equally regardless of diversity characteristic.

Third parties and other sub-contractors are instructed on the basis of their skills, experience, ability and cost and regardless of any diversity characteristic. We will work closely with clients (involving the client or matter partner as appropriate) to agree the instruction of a third party or other sub-contractor who is most appropriate for the matter under consideration.

We recognise the need to balance personal and work life and that flexibility with regard to working patterns assists the broadest range of people. **Please refer to local policies for available working arrangements that support this.**





# Putting it into practice (continued)

## Wellbeing

Our wellbeing strategy is focused on mental wellbeing, physical wellbeing and supporting performance. It also operates hand in hand with other aspects of our wider people strategy, including our culture of continuous feedback and development, and applies across all D&I strands.

We recognise that a balance between work and personal life is key to maintaining wellbeing and achieving high performance. We help support this through sabbaticals and our Family and Career Support Programme.

## Procurement

We ensure that the way in which we purchase goods, services and facilities reflects our D&I principles and behavioural standards. We put procedures in place to ensure that diverse suppliers have appropriate opportunities in competing for contracts. We engage with our suppliers on matters related to diversity and inclusion, seeking to influence and positively impact our supply chains.

We work with benefit providers who support our values and provide a benefits offering which is accessible to all employees, regardless of their diversity characteristics.

## Working with clients

We aim to ensure that our client service teams reflect the diversity of the firm and are inclusive, and that work is allocated fairly to ensure that everyone has an opportunity to contribute and to experience different work types with a wide range of clients.

For every opportunity being explored and discussed we shall consider diverse representation and inclusion, working across offices and locations as appropriate. The team should represent, wherever possible, the diversity of the firm as applicable to the services and expertise being offered.

Our client engagement approach extends to collaboration through shared commitments to build greater D&I as a responsible business.

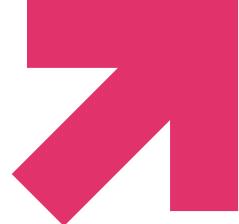
## Public relations, communications and marketing

We look to reflect the diversity of people within our business in our internal and external public relations and communications programmes. We are intentional in our approach to ensuring we provide the support and opportunities to give diverse spokespeople a platform for sharing their knowledge and expertise.

We work to ensure that the marketing collateral we deliver is accessible to all.

We aim to ensure that any panel event we host, internally or externally, is reflective of the diversity of our business. If we are asked to appear on an externally-hosted panel that does not contain diversity, our concern should be raised with the organiser to enable opportunities to be explored.





# Behavioural standards

## Discrimination, bullying and harassment

We expect all colleagues to behave in a way that is supportive of our D&I principles and treat each other with dignity, respect, empathy and compassion at all times, in line with our values. Our aim is to create a culture which supports our values, promotes equality of opportunity and is free from any form of discrimination, bullying or harassment.

**Please refer to the international Bullying and harassment policy for further information on this specific subject.**

We do not tolerate any form of discrimination, bullying or harassment and we encourage a culture where colleagues feel comfortable approaching their line manager to have an open and honest dialogue and are able to report any incidences they encounter or witness.

Any behaviour involving discrimination, bullying or harassment may be subject to disciplinary or alternative appropriate action through our internal procedures.

It is the responsibility of everyone to ensure the implementation of this document and to ensure compliance.

## Micro-aggressions

We expect all our colleagues to be intentional in their actions and behaviours with a view to making the work environment welcoming to everyone and include colleagues who are different from them.

We recognise that we all have biases and personal experiences that lead us to think in a certain way or make assumptions about others. Such biases are built up over a period of time and are often unconscious.

A micro-aggression is an action or behaviour, whether intentional or unintentional, which signal hostile, derogatory or negative attitudes towards an individual or group of people who share diversity characteristics such as race, religion, sex and socio-economic background.

A micro aggression can be non-verbal (such as eye-rolling, heavy sighing and head shaking) or verbal (such as sarcasm, foul language or insensitive remarks), and you are therefore encouraged to reflect on your attitudes towards certain groups and avoid any unintentional micro-aggressions.

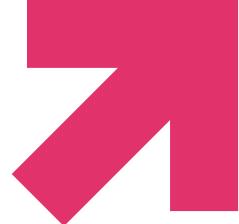
## Jokes and teasing

Jokes, playful comments and good-humoured teasing ('banter') may appear harmless fun, however inappropriate remarks can easily cause offence or escalate quickly, even if no malice was intended.

You should treat your colleagues and others with respect and courtesy at all times, during working hours and outside of work e.g. at social events.

You should avoid making inappropriate remarks including, but not limited to:

- making personalised comments or jokes about colleagues (or their families)
- using terms or comments that could be interpreted as sexist, racist, homophobic, transphobic, ableist, ageist etc.
- making assumptions about others based on their appearance, what they believe in or about their abilities
- teasing or insulting others



# Raising a complaint

## If it happens to you

If you believe you have been treated in any way that contradicts the D&I principles or behavioural standards set out in this document, you are encouraged to report it to one of the following:

- your line manager
- your line manager's manager
- an alternative, trusted senior manager
- your HR Business Partner

Alternatively, you may report your concerns via the Whistleblowing Policy by emailing  
**[whistleblowing@eversheds-sutherland.com](mailto:whistleblowing@eversheds-sutherland.com)**

All complaints will be treated seriously and with appropriate confidentiality.

## If it happens to someone else

We have a collective responsibility to report alleged incidents of discrimination, bullying or harassment. If you witness inappropriate conduct or behaviour against a colleague, you are encouraged to take action. You can:

- intervene immediately and call out any inappropriate behaviour
- discreetly tell them that their behaviour is not in line with firm values and suggest they discontinue such behaviour
- inform their line manager what has happened
- discuss what has happened with your HR Business Partner for advice on next steps

We are aware that such interventions may be sensitive and difficult, particularly if the recipient or the person complained about is more senior than yourself. If you are unsure what to do, please discuss it, in confidence, with your line manager or your HR Business Partner.

## If you are a line manager

Managers should:

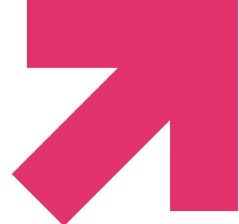
- lead by example and not do anything that may contradict our D&I principles and behavioural standards
- directly call out any behaviours that may contradict our D&I principles and behavioural standards
- seek HR support if they have any specific concerns

Where a manager is informed of or becomes aware of alleged discrimination, bullying or harassment, they should first discuss this with their HR Business Partner for advice and support on next steps.

If the alleged conduct involves a client, an employee of a client or other non-Eversheds Sutherland colleague, appropriate action will be taken that reflects the seriousness of the conduct.

**For further information and guidance please refer to the international Bullying and harassment policy and any relevant local policies, procedures or guidance documents.**





# Support and monitoring

Colleagues who wish to obtain independent support may contact our **Employee Assistance Programme** in confidence.

We are committed to monitoring the effectiveness of this document and associated policies. We undertake a regular review of all policies, procedures and guidance documents to ensure they comply with any legislative changes and good practice.

We will endeavour to identify and take steps to eliminate any unlawful discrimination.



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