Zero Tolerance of Sexual Harassment

Ptarmigan Capital Limited ("Ptarmigan Capital" or "the Firm") is committed to providing a safe, respectful and inclusive workplace. Under the Equality Act 2010 we must take reasonable steps to prevent sexual harassment in our workplace and to foster a culture based on dignity and respect. Therefore, we operate a zero-tolerance policy towards sexual harassment in any form. This not only applies to all employees of the Firm, but to clients, contractors and other third parties connected to the Firm.

The Financial Conduct Authority ("FCA") has confirmed that serious non-financial misconduct, from sexual misconduct to bullying, harassment and discrimination may breach the FCA Conduct Rules and may be relevant when assessing an individual's fitness and propriety.

Definition

Sexual harassment is unwanted behaviour of a sexual nature that has the purpose or effect of:

- violating someone's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone.

It can be sexual harassment if the behaviour has the above effects on an individual even if that was not the original intention, also if it was intended to have the above effect but failed on that occasion.

Examples of sexual harassment include (but are not limited to):

- Unwelcome sexual advances or comments.
- Inappropriate touching or physical contact.
- Displaying, sharing or circulating offensive material.
- Suggestive jokes, gestures or messages.

Our Staff Handbook defines sexual harassment, our investigation process and the factors that will be taken into account in deciding what disciplinary action we will take. It also contains a detailed complaint procedure. A copy of the Staff Handbook is provided to our employees upon joining the Firm; consultants and other staff can access the handbook upon request. If evidence of misconduct is found, disciplinary action will follow, up to and including dismissal.

Ptarmigan Capital expects individuals to treat colleagues, clients and partners professionally and with respect. Just as the Firm will not tolerate sexual harassment among its staff, we also refuse to tolerate third party sexual harassment (e.g. clients, suppliers or visitors to our premises) and our staff are encouraged to report it if they experience it. Ptarmigan Capital will take steps to remedy a complaint and prevent it from happening again, including warning a client, supplier or visitor about their behaviour, banning such a person, reporting any criminal acts to the police or sharing information with the offender's employer.

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