

EQUAL OPPORTUNITIES POLICY - LONDON OFFICE

1. POLICY

- 1.1 It is the firm's policy to treat all members of the firm, client personnel and suppliers and anyone visiting our offices equally, regardless of their sex, age, race, disability, religion or belief or sexual orientation. Consequently, the firm will not discriminate on grounds of sex, age, civil partnership or marital status, gender reassignment (collectively "sex"), race, colour, nationality, or ethnic or national origin (collectively "race"), disability, sexual orientation, religion or belief. For this purpose members of the firm include all employees, whether permanent or fixed term and all agency staff, contractors and temporary and casual workers.
- 1.2 This policy applies to the advertising of jobs and appointment to them; recruitment generally; training; promotion; conditions of work and pay; and every other aspect of employment.
- 1.3 All members of the firm have personal responsibility for implementing this policy. Any request for clarification about the application of the policy, or any other questions, should be addressed to your Head of the Department, Group Manager, Practice Stream Leader or the HR Department. If you are involved in recruitment or selection decisions, you should request training if you have any doubt about the application of this policy.

2. SEX, AGE, RACE, SEXUAL ORIENTATION AND RELIGION OR BELIEF DISCRIMINATION

- 2.1 Discrimination on the grounds of sex, age, race, sexual orientation and religion or belief may be direct or indirect and may occur unintentionally.
- 2.2 Direct discrimination occurs where someone is treated less favourably for a reason related to one or more of these grounds. For example, rejecting an applicant of one race because it is considered he/she would not "fit in" is likely to be direct discrimination.
- 2.3 Indirect discrimination occurs where an apparently neutral provision, criterion or practice puts, for instance, women or members of a particular racial group at a disadvantage when compared to men or someone not of the racial group. For example, a height requirement is likely to eliminate proportionately more women than men. If this criterion cannot be objectively justified for a reason unconnected with gender, it would be indirectly discriminatory on the grounds of gender.
- 2.4 Discrimination also includes "victimisation", which is treating a person less favourably because they have taken action to assert their legal rights against discrimination or because they have assisted a colleague in that regard.
- 2.5 Finally, harassment on discriminatory grounds will also amount to unacceptable discrimination and this is dealt with in the firm's separate Dignity at Work Policy.

3. DISABILITY DISCRIMINATION

If you are disabled or become disabled during the course of your employment with the firm, you are encouraged to tell the firm about your condition. This is to enable us to support you to as great an extent as possible. You may also wish to advise the firm of

any reasonable adjustments to your employment or working conditions which you consider necessary, or which would assist you in the performance of your duties. The firm will consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible. Nevertheless, there may be circumstances where it will not be reasonable or possible for the firm to accommodate the adjustments suggested.

4. **COMPLAINTS**

If you believe that you have been disadvantaged on discriminatory grounds you are encouraged where possible to raise the matter through the Grievance Procedure. If you believe that you have been harassed, you are encouraged to raise the matter through the procedure set out in the Dignity at Work Policy.

5. **DISCIPLINE**

If you harass any other worker on the grounds of sex, age, race, disability, religion or belief, or sexual orientation or otherwise act in breach of this policy, you will be subjected to the firm's Disciplinary Procedure. In serious cases, such behaviour will constitute gross misconduct and, as such, may result in summary dismissal.

August 2006



DIGNITY AT WORK - LONDON OFFICE

1. POLICY

- 1.1 Hogan Lovells is committed to supporting the right of all members of the firm, client personnel and suppliers and anyone visiting our offices to be treated with dignity and respect, and to work in an environment free from harassment, victimisation and discrimination. For this purpose, members of the firm include all employees, whether permanent or fixed term and all agency staff, contractors and temporary and casual workers.
- 1.2 Harassment and victimisation are unacceptable practices and the firm will not tolerate such behaviour. Harassment and victimisation can occur both in and out of the office, such as on business trips and at firm's events or firm sponsored social functions, whether on the firm's premises or not. Harassment and victimisation in any of these contexts are covered by this policy.
- 1.3 All members of the firm have a duty to be aware of how their behaviour affects others. There may be cases where a member of the firm may be unaware of the effect of their behaviour on colleagues. For this reason it is particularly important that everyone familiarise themselves with this policy and be aware of the possible effects of their conduct on others.
- 1.4 This document sets out Hogan Lovells' policy on harassment and victimisation and outlines the procedure to follow if any member of the firm feels that they have been subjected to harassment.

2. DEFINITION OF HARASSMENT AND VICTIMISATION

Harassment is defined as any unwanted conduct or behaviour based on sex, age, marital status, gender reassignment (collectively "sex"), race, colour, nationality, or ethnic or national origin (collectively "race"), disability, religion or belief, sexual orientation or personal characteristics which:

- (a) is intended to affect, or actually affects, the dignity of a person at work; or
- (b) creates an intimidating, hostile, degrading, humiliating or offensive environment for a person.

Victimisation occurs when someone is treated less favourably because of something they have said or done in connection with anti-discrimination legislation.

Victimisation can affect an individual after they have made a complaint of discrimination, if colleagues change their behaviour and put the individual at a disadvantage or treat them less favourably.

- 2.1 Conduct can include any unwelcome physical, verbal or non-verbal behaviour. Harassment and victimisation generally arise only if there is repeated unwanted conduct but it can arise from a single incident if it is serious. A wide range of behaviour can constitute harassment and victimisation. The following are examples but the list is by no means exhaustive:

- (a) sexual, racial, ageist or religious remarks or jokes;
- (b) unwanted physical contact whether repeated or not;
- (c) comments relating to someone's sexual orientation;
- (d) unwelcome comments about dress or appearance;
- (e) the display of sexually or racially offensive posters, such as picture "pin-ups", or the circulation of sexually explicit or racially abusive materials, or computer graphic pornography;
- (f) the circulation or display of leaflets, magazines, electronic communications and other materials which degrade particular races.

3. PROCEDURE

3.1 Informal stage

Many incidents of harassment can be dealt with effectively in an informal way, as the harasser may have little idea of the effect their behaviour is having on others. Once it is drawn to their attention the behaviour ceases. If an incident happens which offends you and leads you to believe you are being harassed you are encouraged to ask the person responsible for the behaviour to stop it. This informal stage will not generally result in any formal internal investigation or disciplinary action, but is intended to enable you to resolve the matter as quickly and as amicably as possible.

The firm recognises that in some cases this stage of the procedure will not be appropriate.

3.2 Formal stage

If the harassment continues, or if you do not want to approach the person creating the problem, or informal resolution is not appropriate, you should raise the issue with your Group Manager, Head of Department, or the HR Department. If the person who is the subject of the complaint is your Group Manager or Head of Department, the matter should be reported to your Practice Stream Leader, the Regional Managing Partner (London) or the HR Department.

- (a) If you wish to make a formal complaint, you should raise the issue by putting the complaint in writing to the relevant person as described above. You should include all appropriate information (for example, the name of the harasser, the nature of the harassment, the name of any witnesses and any action taken so far to stop the harassment). It is helpful if you keep records such as a diary of dates and events.
- (b) As a general principle, the decision to progress a complaint rests with the individual, but the firm may independently pursue a complaint if it considers such action to be appropriate in all the circumstances. If so desired, the person dealing with the complaint will help you prepare your complaint and accompany you to any meetings.
- (c) Complaints will be managed in a timely and confidential manner with the investigation being conducted in an objective manner and by an independent person from within the firm. Consideration will be given to whether the alleged harasser should remain in their current post or be transferred or suspended on full pay, or whether managerial arrangements should be altered pending the outcome of the investigation. Any conclusions will normally be reached within two weeks of the complaint being reported. The prompt, thorough and impartial investigation will

pay due regard to your rights and also those of the alleged harasser. Both you and the alleged harasser may be accompanied by a colleague of your choice during investigations.

- (d) If an investigation reveals that the complaint is valid, prompt action will be taken to stop the harassment immediately and prevent its recurrence. The issue will then be dealt with under the firm's Disciplinary Policy. You may be requested to provide a statement for use in, or give evidence in relation to, the disciplinary proceedings. You will be told that disciplinary action has been taken, although you will not be told of the sanction which is imposed. This will ensure fair and consistent treatment under an established policy.
- (e) Even where a complaint is not upheld (for example, where evidence is inconclusive) consideration will be given to how the ongoing working relationship between you and alleged harasser should be managed.
- (f) Anyone with a genuine complaint will be protected from intimidation, victimisation or discrimination for filing a complaint or assisting in an investigation.
- (g) Any complaint that is not made in good faith will be treated as a disciplinary offence, which may result in summary dismissal.

4. APPEAL

If you are not satisfied with the outcome of the investigation, you have the right to appeal against the decision within 14 days of being notified of the outcome. You should lodge your written appeal with the Director of HR. The person hearing your appeal will meet with you to discuss your case. You may be accompanied by a colleague of your choice. You will be notified of the outcome of the appeal. This is the final stage of the Dignity at Work Procedure.

5. CONFIDENTIALITY

This policy stresses the importance of confidentiality throughout all parts of the procedure. It is the responsibility of anyone who is part of the process to respect the high level of confidentiality that is required. Breach of confidentiality may give rise to disciplinary action.

6. RESPONSIBILITY FOR THIS POLICY

- 6.1 The HR Department has the responsibility for ensuring the maintenance, regular review and updating of this policy and the maintenance of an effective complaints procedure.
- 6.2 All members of the firm have a personal duty to comply with this policy and to ensure that their colleagues are treated with respect and dignity.
- 6.3 Should a client, supplier or other visitor to the firm raise an issue regarding harassment, it is the responsibility of the partner or line manager to raise this with the Director of HR.
- 6.4 Any queries on the application or interpretation of this policy should be discussed with the HR Department prior to any action being taken.

August 2006

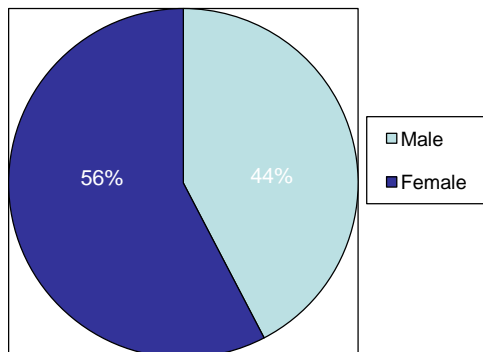
Hogan Lovells UK Diversity Profile

August 2012

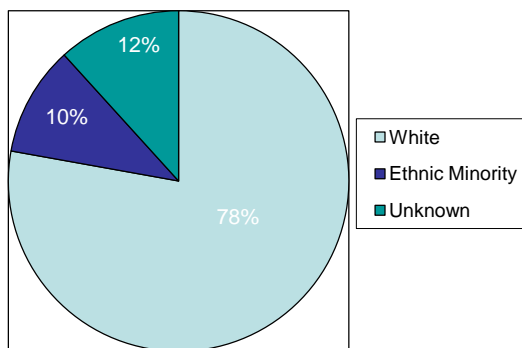


UK - All - Diversity Profile

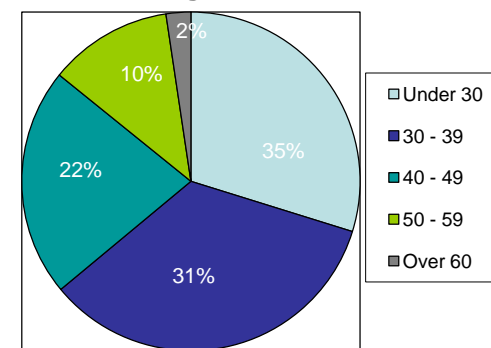
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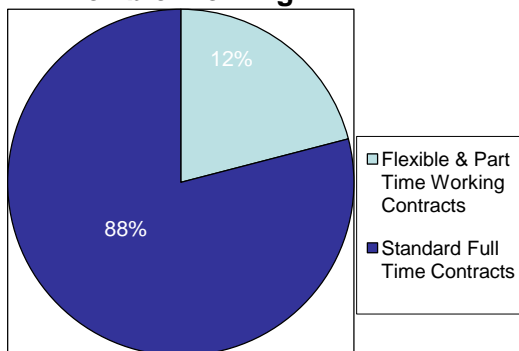
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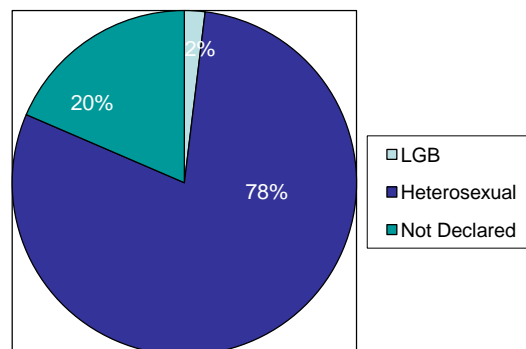
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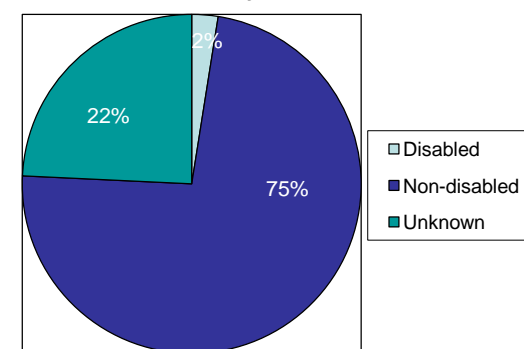
Flexible Working



Sexual Orientation

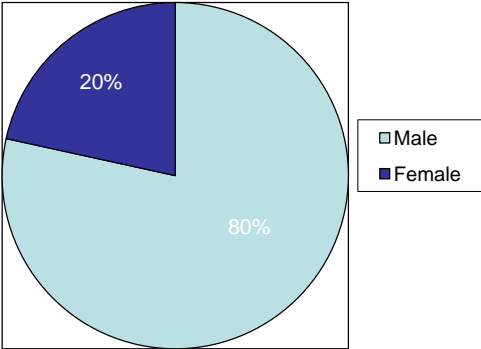


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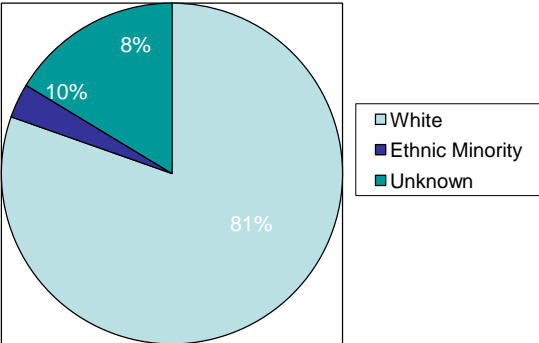


UK - Partners - Diversity Profile

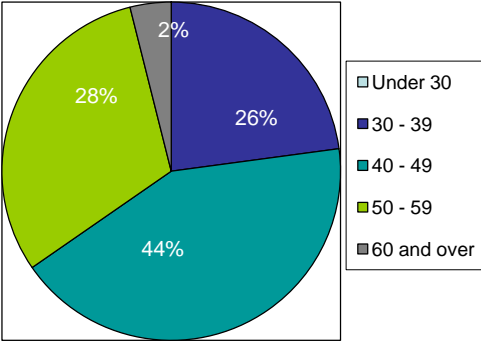
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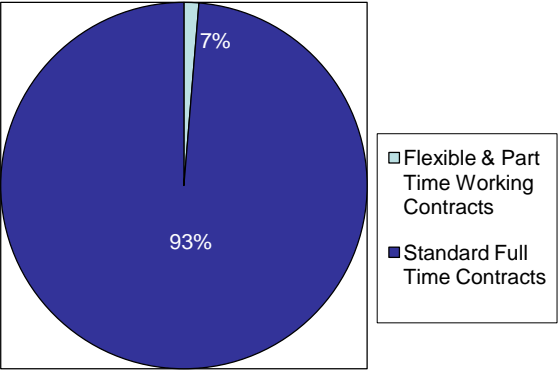
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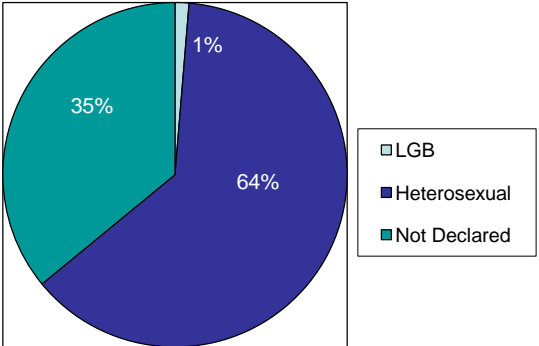
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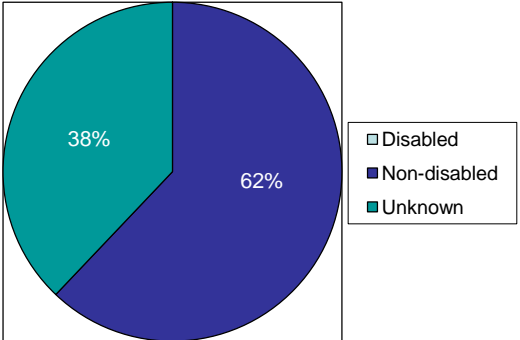
Flexible Working



Sexual Orientation

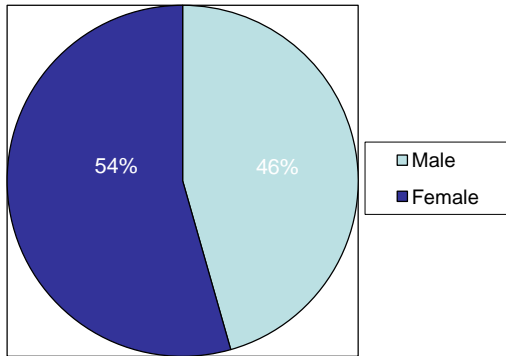


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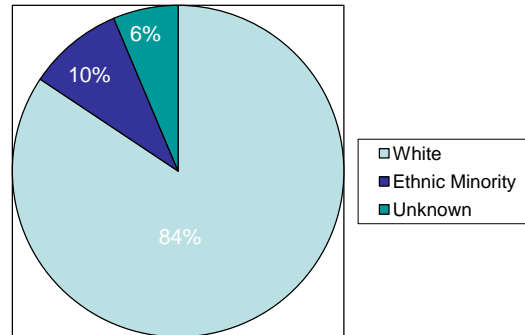


UK – Associates & Other Legal - Diversity Profile

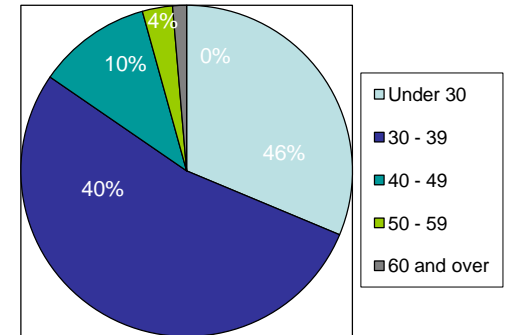
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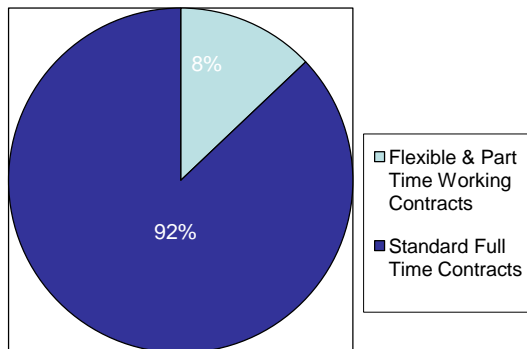
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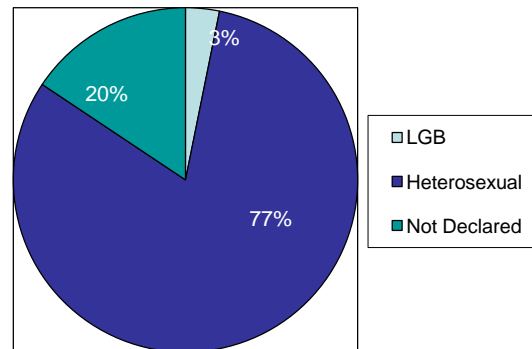
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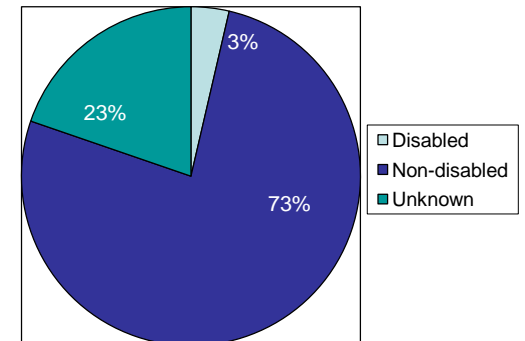
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Sexual Orientation

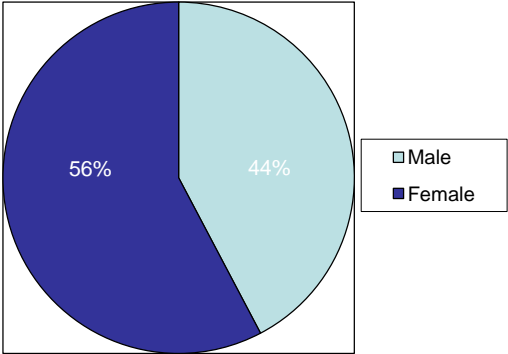


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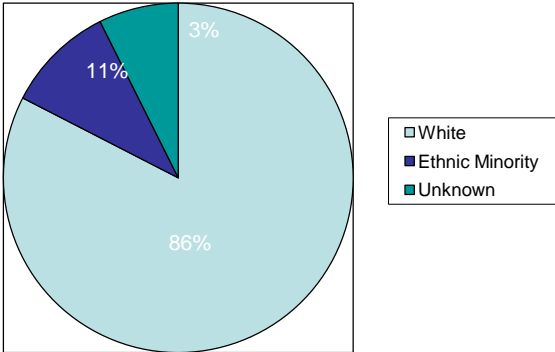


UK - Trainees - Diversity Profile

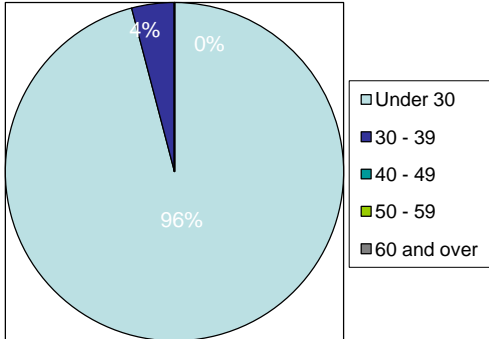
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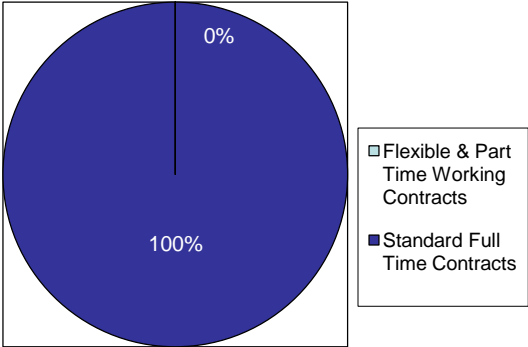
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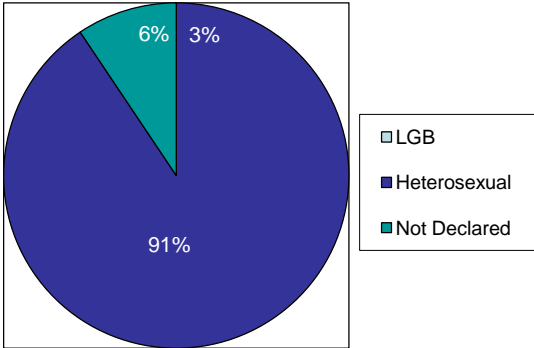
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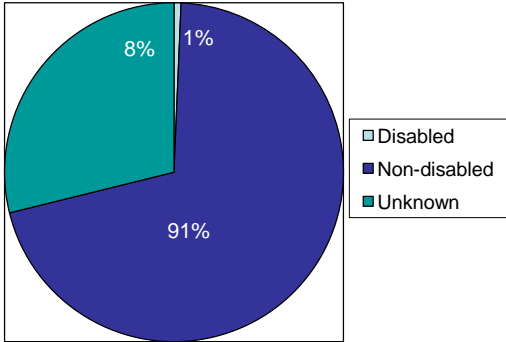
Flexible Working



Sexual Orientation

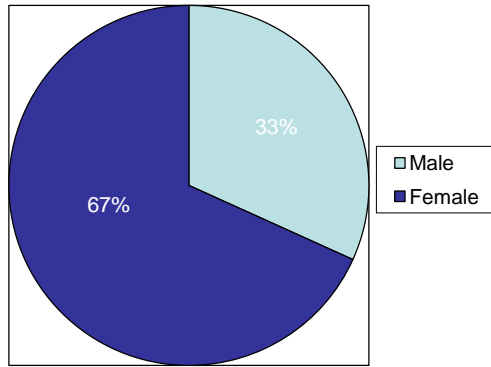


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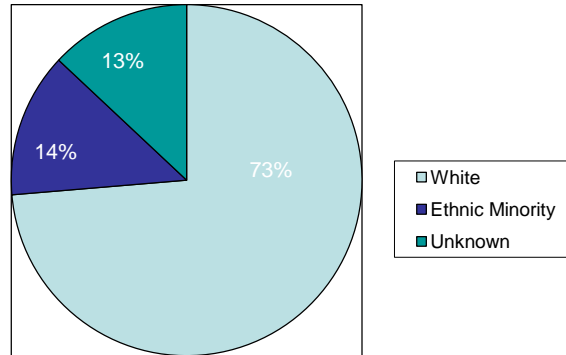


UK – Business Services - Diversity Profile

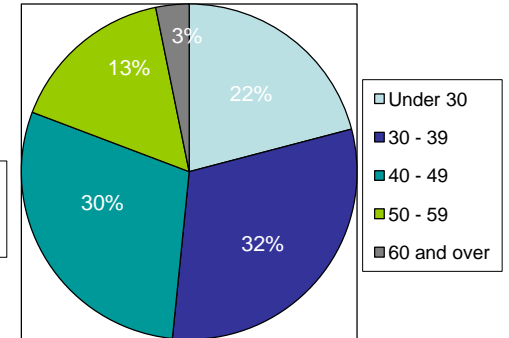
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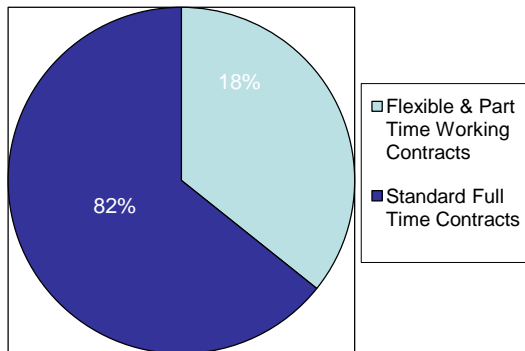
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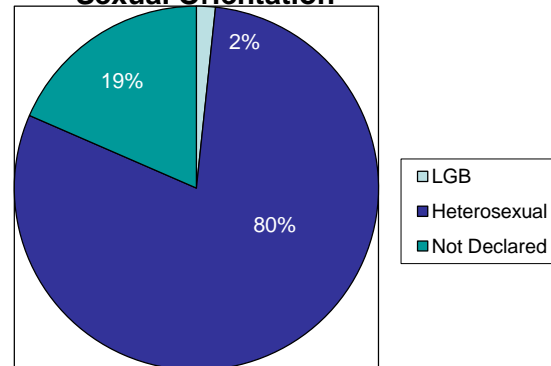
Age



Flexible Working



Sexual Orientation



Disability

