Equality, Respect & Professional Conduct Policy



GENISTAR
Financial Freedom For All

1. Purpose

Genistar is committed to maintaining a professional environment where people are treated fairly, with dignity and respect.
These standards set out the professional conduct expected of individuals who choose to represent Genistar.

Discrimination, bullying, harassment, sexual harassment and victimisation are not acceptable and may affect an individual's ability to continue representing the business.

2. Scope

This section applies to all Genistar Representatives in connection with their Genistar activities.

This includes interactions with:

- Clients and prospective clients
- Other Representatives
- Genistar employees
- Product providers and business partners
- Contractors, suppliers and visitors
- Members of the public

These standards apply whether interactions take place:

- In person
- By telephone
- By email or messaging platforms
- Through social media
- During appointments, meetings, events or training
- During business-related travel or social activities

These standards may also apply where conduct outside of Genistar activities could reasonably impact an individual's suitability to represent the business.

3. Equality and Fair Treatment

Representatives must treat others fairly and respectfully.

A Representative must not discriminate against another person because of:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity
- Race, colour, nationality, or ethnic or national background
- Religion or belief
- Sex
- Sexual orientation

Representatives must:

- Act professionally and respectfully
- Use appropriate language and behaviour
- Respect individual differences
- Promote an inclusive environment
- Raise concerns where they become aware of behaviour that may breach these standards

Representatives must not encourage, support or ignore discriminatory behaviour.

4. Bullying and Harassment

Representatives must not engage in bullying or harassment.
Bullying or harassment may include behaviour that is intimidating, hostile, degrading, humiliating, offensive or threatening.

Examples may include:

- Personal insults or derogatory comments
- Offensive jokes or remarks
- Deliberately excluding or undermining someone
- Intimidating or threatening behaviour
- Abusive messages, emails or social media activity
- Behaviour targeted at a person's protected characteristic

Bullying and harassment may take place face-to-face, online, in writing or through any other form of communication.

A single serious incident may be sufficient to breach these standards.

5. Sexual Harassment

Representatives must not engage in sexual harassment.
Sexual harassment is unwanted conduct of a sexual nature that creates an intimidating, hostile, degrading, humiliating or offensive environment, or violates a person's dignity.

Examples may include:

- Sexual comments, jokes or remarks
- Unwanted sexual advances
- Suggestive gestures or behaviour
- Intrusive questions about a person's private life
- Sexual rumours
- Sexual images, messages or online content
- Unwanted physical contact

Behaviour described as "banter" may still amount to sexual harassment.
Sexual harassment may occur in person or through digital channels, including messaging applications and social media.

6. Interactions Clients and Other Third Parties

Representatives must apply the same standards of conduct when dealing with clients, prospective clients, suppliers, contractors, business partners and members of the public.

Representatives must not discriminate against, bully, harass or sexually harass any third party.

Where a Representative becomes aware of behaviour involving bullying, harassment or sexual harassment connected with Genistar activities, they should report the matter promptly.

This includes behaviour involving:

- Clients
- Prospective clients
- Representatives
- Genistar employees
- Other third parties connected with Genistar activities

Where appropriate, Genistar may review concerns raised and act reasonably considered necessary to protect those involved and the interests of the business.

7. Reporting Concerns

Concerns may be raised through:

- An EVP or senior field leader
- HR at HR@genistar.net or 0203 923 9679

Anyone raising a concern should provide as much relevant information as possible, including details of the individuals involved, dates, locations, witnesses and any supporting evidence.

Concerns raised in good faith will be considered appropriately and handled sensitively.

8. Review of Concerns

Where concerns are raised, Genistar may:

- Review available information
- Speak with relevant individuals
- Request supporting evidence
- Consider whether further action is appropriate

Information will be shared only where there is a legitimate business reason for doing so.

9. Breaches

Failure to meet the standards set out in this section may result in Genistar:

- Requiring additional training
- Restricting participation in certain activities
- Limiting access to systems, events or opportunities
- Reviewing the individual's ongoing relationship with the business
- Suspending or terminating the individual's ability to represent Genistar
- Referring matters to external authorities where appropriate

The action taken will depend on the circumstances and seriousness of the conduct.

10. Representative Obligations

As a condition of representing Genistar, Representatives must:

- Comply with the standards set out in this document
- Complete compliance training required by Genistar
- Cooperate with any review of concerns raised under these standards
- Maintain appropriate confidentiality
- Treat anyone who raises a concern in good faith fairly and without retaliation

Failure to meet these standards may affect an individual's ability to continue representing Genistar.

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Authorised and Regulated by Financial Conduct Authority.