

# Diversity and Inclusion Policy



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# 1 Overview

## 1.1 Purpose

The Equiniti Diversity and Inclusion Policy ('the Policy') sets out our approach and intent upon diversity and inclusion for Equiniti including the Board of directors of Equiniti Group plc ('the Board'). We operate in increasingly diverse communities both in the UK and internationally and this diversity is evident in our workforce and our customers, suppliers and other stakeholders. In our increasingly competitive business environment we understand that the performance & engagement of our people is a critical business imperative.

In order to achieve continued business success it is key that Equiniti continues to reflect this diversity, and creates an open and inclusive culture able to support, sustain, and develop our diverse workforce to support our customers and the markets we serve. This will increase engagement with our people and positively impact upon their performance enabling us to achieve better business outcomes enabling Equiniti to achieve its business strategy and plan. Specifically a Diverse & Inclusive workforce helps us to:

- Make objective decisions about how we organise and optimise resources and work by eliminating structural and cultural barriers & bias, enabling us to work together effectively.
- Protect and enhance our reputation and licence to operate by recognising, respecting and harnessing the needs and interests of diverse stakeholders.
- Deliver strong performance and growth by being able to attract, engage and retain diverse talent.
- Innovate by drawing upon the diversity of perspectives, skills, styles and experience of our employees and stakeholders.
- Adapt and respond effectively to societal changes & growth.

Protected characteristics covered by UK/EU legislation are age, disability, gender or gender reassignment, marriage and civil partnership status, pregnancy and maternity, race (including ethnic origins, nationality and colour), religion or belief or absence of religion or belief and sexual orientation. In addition other personal factors such as part time and fixed term status provide no basis for less favourable treatment.

As part of that philosophy, we believe that every employee has the right to be treated with respect and dignity throughout their employment with Equiniti and not to be discriminated against. We have a zero tolerance attitude to bullying, harassment or victimisation of any kind. We seek to achieve higher standards than the statutory minimum set out in legislation and we will pro-actively create a culture that supports diversity, inclusion and equal opportunity. In this context the effectiveness of the Policy will be monitored and evaluated on a regular basis, through measurement and annual review by the Equiniti Diversity & Inclusion Council and Nomination Committee, who will recommend any revisions that may be required to the Board for approval.

## 1.2 Audience

This policy applies to all Equiniti (including all group companies) employees, the Non-Executive Directors on the Board and employees working in our offshore offices in Amsterdam and India (where legally practicable).

## 1.3 Objectives

- To set out Equiniti's policy on Diversity and Inclusion.
- To promote a diverse and inclusive culture and ensure that there is zero tolerance for unfair and unlawful discrimination within Equiniti.
- To set clear expectations for everyone who works for or with Equiniti and to ensure that they understand the supporting policies and process should they wish to raise an issue or concern.

## 2 Policy Statement – Our Commitment to Diversity and Inclusion

We are committed to creating an inclusive working environment, in which each employee is able to fulfil their potential and maximise their contribution. By bringing together employees from diverse backgrounds within an inclusive culture, each person will be able to fully contribute their skills, experience and perspectives and deliver the best solutions to challenges and deliver sustainable value for Equiniti and its stakeholders. Our employment policies and practices reflect a culture where decisions are made solely on the basis of individual capability and potential in relation to the needs of the business. We will not tolerate bullying and harassment in any form. In addition we will protect our employees from any form of third party harassment, and from adverse treatment because of association or perception related to any of the protected characteristics mentioned above.

We recognise the value of a diverse workforce in helping us understand the needs of our large and diverse customer and community base and that this can help ensure we tailor our products and services accordingly, support sales growth and customer retention. We expect our suppliers and partners to actively support us in achieving a diverse and inclusive culture and to be able to demonstrate this.

## 3 Key Principles

### 3.1 What Diversity and Inclusion Means for Equiniti

- Embracing workforce diversity – represented by visible & invisible differences (age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, and physical ability).
- Valuing diversity of perspective – leveraging the diverse thinking, skills, leadership experience and working styles of our employees and other stakeholders.
- Building a flexible organisation – providing opportunities for work arrangements that accommodate the diverse needs of individuals at different career and life stages.
- Respecting stakeholder diversity – developing strong and sustainable relationships with diverse shareholders, communities, employees, governments, customers and suppliers.

### 3.2 Associated Policies

- This policy is supported by appropriate bullying and harassment, disciplinary and grievance procedures. It applies to all employment policies and practices including those relating to:
  - Recruitment and selection.
  - Promotion and career progression.
  - Learning and development.
  - Reward and benefits.
  - Diversity monitoring.

## 4 Equality and Diversity in Practice

### 4.1 Communication

Equiniti will ensure that this policy is accessible and understood by all colleagues.

Getting our message across successfully means our people will:

- Be aware of the Equiniti policy on diversity and inclusion.
- Understand the benefit of valuing diversity and how this impacts on the business.
- Have a greater awareness of the value of more inclusive communication.
- Understand their own role in promoting diversity and inclusion.
- Be aware of their legal responsibilities under current equality legislation.

### 4.2 Company Responsibilities

- To actively support diversity and inclusion and to ensure that all our employees are valued and treated with dignity and respect.
- To continually strive to provide employees with a working environment that is free from discrimination.
- To ensure managers work in partnership with employees to create and sustain an inclusive working environment where everyone's contribution is valued.
- To ensure that decisions affecting employment, training, promotion and career development are based on an individual's ability.
- To comply with relevant legislation by requiring all employees to meet our standards of behaviour and conduct in relation to how they treat their colleagues and other people they have contact with as part of their work with Equiniti.
- To regularly review the Policy and its practical application and make any updates to continue to work towards identifying and eliminating any discrimination practices.
- To make adjustments to meet the needs of disabled employees, workers and customers where reasonable and practicable to do so.
- To ensure all internal publications and material reflect, in the language and images, the diversity of our employees, clients, customers and stakeholders.
- Special responsibility for the practical application of our approach to diversity and inclusion falls upon our Leadership team, Managers, Team Leaders and HR Business Partners involved in day-to-day supervision and management of employees and of recruitment, selection, promotion, and training of employees.
- Our Managers have a personal responsibility for ensuring that this policy is communicated, understood and applied within their own areas.

- The HR Team in conjunction with Business Leaders will annually assess our progress to achieve our diversity and inclusion objectives. This will include workforce metrics and comparators against benchmarks and best practices.

## 4.3 Employee Responsibilities

- All Equiniti employees, the Non-Executive Directors on the Board and employees working in our offshore offices in Amsterdam and India (where legally practicable), will be responsible for the practical application of the Policy. This extends to the treatment of job applicants, employees, customers, contractors and temporary staff, suppliers and visitors.
- To familiarise themselves with this policy and to act in accordance with Equiniti's commitment to diversity and inclusion at all times. Any queries in the application or interpretation of this policy should be discussed with HR prior to any action being taken.
- Not to discriminate against colleagues and other people they have contact with as part of their work with Equiniti, treating everyone with respect and helping to create an environment that is free from discrimination and/ or harassment of any kind.
- To be sensitive to the potential impact of their behaviour on colleagues, clients, customers, visitors, suppliers, contractors and temporary staff.
- To work in partnership with managers to create and sustain an inclusive working environment, in which everyone's unique contribution is recognised and valued.
- To co-operate with managers in the elimination of any discrimination practices and/ or harassment that may be identified. Our employees have a personal responsibility to advise their Line Managers, HR or to follow the grievance procedures if there is a belief that any discrimination has occurred.

## 4.4 Other Equiniti Policies

All our policies and processes are designed to promote equal opportunity and protection against unfair and unlawful discrimination for all employees.

## 4.5 If things go wrong

Employees who feel they have been unfairly treated contrary to this policy should raise their concerns with their manager in the first instance in order to get them addressed. If it is not appropriate to raise the concern with their direct manager they should raise it with another manager or PeopleServices. If matters are not addressed, the individual can raise a grievance using the Equiniti Grievance Procedure. All complaints will be investigated thoroughly and without delay.

Contravention of this policy by way of bullying, harassment of or discrimination against a colleague will be considered a disciplinary offence and dealt with under the Disciplinary Procedure.

Employees should feel confident that raising a grievance will not have an adverse effect on them, and that Equiniti will protect them from victimisation.

## 5 Monitoring

Equiniti undertakes monitoring annually, as part of the pay review process, which is used to inform and improve our employment practices. If through monitoring any discrimination is identified Equiniti will take corrective action to eliminate it.

Such monitoring will be carried out using appropriate statistical analysis, and would normally deal with areas such as race, disability, gender, and age and ensure compliance with legislation. Any resultant statistics and analysis will be held by Human Resources and maybe shared with the Unions.

Equiniti is also required to carry out specific equality monitoring in Northern Ireland under the Equality Commission. We are registered with the Equality Commission for the purposes of the *Fair Employment & Treatment (NI) Order 1998*. As such we are obliged to monitor the *community background* and *sex* of our job applicants and workforce. We are also obliged to review the composition of our workforce and our employment policies and practices every three years and, where appropriate, to consider taking affirmative action to promote fair participation between members of the Protestant and Roman Catholic communities. We are committed to complying with these duties and will put in place suitable arrangements to ensure that we do so.

To get an accurate picture of Equiniti and to identify any inequalities, we will:

- Collect on a voluntary basis individual personal information on the diversity of potential recruits and existing employees.
- We will encourage all employees to complete the Equal Opportunities section under the Employee self-service information held online.

### **Review of the Policy**

The Executive and Nomination Committees will review the Policy annually and recommend to the Board for approval of any revisions that may be required.

### **Approved by the Board of Equiniti Group plc**