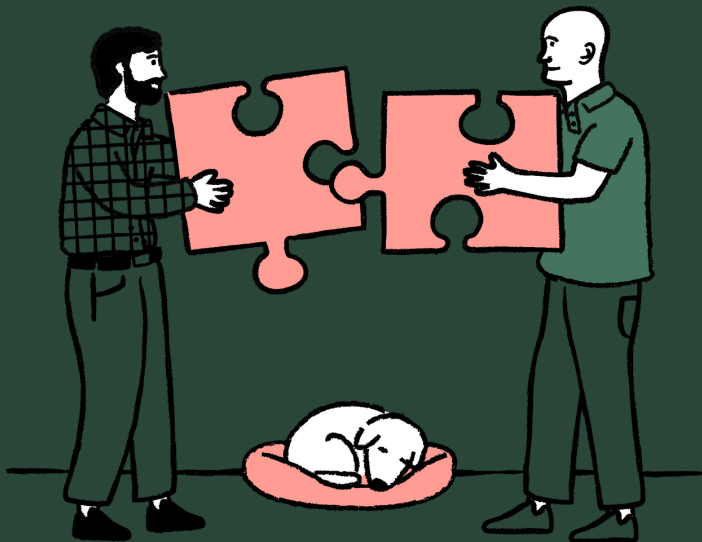


How we show up

# Our approach to inclusion



## **We treat each other equally. No excuses.**

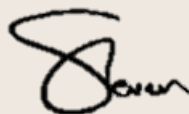
We spend a big part of our waking time at work, so it's important we respect and accept everyone for who they are – and we can't do this without embracing diversity, inclusion, and equity.

We all have different lived experiences, strengths, and skills – and things would be very boring if we didn't! I believe that our differences make us a stronger company - and it's a big part of why I love it.

Whatever your lived experience or however you identify we promise to treat you fairly and equally. This a journey we're all on together and it starts with reflecting on and appreciating our differences - and taking time to understand each other better.

We all need to feel safe and able to speak-up and do the right thing. In doing this, we show we care about each other, our customers and society. All business decisions for both our customers and our own teams are aligned with this approach.

Please read on and we'll explain some of the things we're doing to put diversity, equity, and inclusion at the heart of everything we do - and what we need from you.

A handwritten signature in black ink, appearing to read "Sarah".

## **We give everyone the same opportunity**

We give you the same opportunities as everyone else and we won't discriminate against you at any point. This includes how we hire, our conditions of employment (including pay), feedback, promotions, learning opportunities, performance, disciplinary and grievance procedures - through to our partnerships, investors, supply chain and procurement.

This applies to all of us: permanent employees, contractors, temps, volunteers, consultants, early careers, and partners. It's how we do business - and we promise to do things fairly, regardless of:

- Age
- Sex
- Gender identity or identities
- Romantic or sexual orientation
- Physical or non-visible disability
- Marital, relationship or civil partnership status
- Family, fertility, pregnancy, or parental status
- Nationality, ethnicity, ancestry, or heritage
- Genetic information
- Medical history (including HIV status)
- Past or present military service
- Religion or beliefs
- Political views or ideologies

We call these 'protected characteristics' – and because things change, we'll review this policy every year.

## **Your responsibilities**

We all need to do our bit. We'll give everyone in the company training to help us understand what behaviours are okay and not okay – and how to address any concerns. Our People team and Inclusion Council are also here for support or guidance at any time.

If you're a manager you'll know that being fair and equal is fundamental to how we hire, build teams and work with each other day to day. Please don't worry if you're a new manager - we'll support you with training to help you learn and lead by example.

Don't keep it to yourself. If you see something wrong (or have feedback for us) please speak up. You can talk with your manager, the Inclusion Council, or our People team - we need to hear about it so we can do the right thing.

## **Putting a stop to discrimination**

Discrimination has no place in our business – and it's unlawful. We don't tolerate discrimination against employees, former employees, candidates or applicants, clients, partners, customers, consumers, suppliers, or visitors. It has no place in or outside of work and that includes our big get togethers, team meetups, social events, networking, interviews, client visits and meetings: both in-person or online. Here are five examples of how someone could be discriminated against:

### **Direct discrimination**

This is when someone treats you differently because of who you are. It can be because someone *thinks* you have a particular protected characteristic too. An example would be rejecting a job

application because of someone's ethnicity, or not interviewing someone because you think they might be disabled.

### **Indirect discrimination**

This is when a rule or requirement that appears to be neutral and the same for everyone creates a disadvantage for someone in particular because of a protected characteristic. An example would be that we state we need to hire someone to work full-time hours for a job. A person who has caring or parental responsibilities could be at a disadvantage, as it isn't always manageable to care for someone else and work full-time hours. People with caring or parental responsibilities are statistically more likely to be female, so this would be seen as indirect gender discrimination.

### **Harassment**

This is when someone deliberately pesters, bullies, or harasses you because of a protected characteristic. It could be doing or saying things which you feel violate your dignity, or something intimidating, hostile, degrading, humiliating or offensive to you. An example is sexual harassment, which means making unwelcome sexual or romantic advances towards someone else. This could be from someone making obscene or suggestive comments in person - or sharing degrading jokes or images online by a work channel (e.g., Slack) or a personal medium (e.g., WhatsApp.)

### **Victimisation**

This is when someone makes things worse for you because you've raised a concern about discrimination or harassment - or supported someone else's complaint. An example would be if you receive nasty or intimidating comments in person or online, after you've supported a colleague when they've raised a grievance.

### **Disability discrimination**

This is when someone treats you differently because of a perceived or real disability. An example would be if we do not offer to make reasonable adjustments to help someone with dyslexia during the hiring process. Another example would be picking a venue for an in-person meeting, which does not accommodate a team member who you know has a physical disability.

## **Your time with us**

We don't discriminate against anyone throughout your time with us. This includes hiring, interviewing and selection through to promotions, learning and development, internal mobility - or saying goodbye.

### **Sourcing talent**

When we hire, all our job descriptions are checked for gender language balance, and we also check the "reading burden" – so our job descriptions are accessible and easy for everyone to understand. We make sure that any candidate (internal or external) can contact us in confidence should they need help with their application. Our career site has a simple "easy-apply" process to support those with different accessibility needs and we use Greenhouse.io - one of the most accessible recruitment systems available. We advertise opportunities across multiple websites and our own internal career board to encourage applications from a wide talent pool: not just the easiest or quickest place to hire from.

Our recruitment partners have signed up to our terms of business which clearly state that they also need to uphold the same values when it comes to equal opportunities – and we won't work with anyone who doesn't actively promote inclusive hiring.

## **Our hiring process**

When interviewing, we'll never ask questions that discriminate against someone. Anything we ask will be relevant to the job, the persons' experience, and their application. (It's also worth pointing out that if you're found to have discriminated against someone in the hiring process there can be serious repercussions for both the company and the interviewer.)

If we interview or meet someone face-to-face, we'll ensure we have an accessible venue and we'll take any reasonable adjustments into account, such as access to a hearing loop. When interviewing someone online (typically via Zoom) we'll ensure to check this is suitable and make sure the candidate can request any adjustments ahead of the meeting.

## **Extending offers**

We won't ask about someone's health, wellbeing, or disability before we make an offer of employment. There are a few exceptions, including:

- Asking if we need to make any reasonable changes or adjustments so we interview or assess you fairly.
- Checking you can perform the essential parts of the job and making reasonable changes or adjustments, as needed.
- Taking positive action to hire people with visible or non-visible disabilities.
- Collecting data to help us measure our effectiveness and checking our processes on how we hire or make decisions on applications.
- If we need to, we can make job offers that depend on a medical check.

## **References and background checks**

When it comes to checking your right to work, we won't assume anything about your immigration status based on how you look, how you speak, your application or your protected characteristics. We have a legal obligation to check everyone's right to work as part of the application process. We often support visa applications, and we will always try to support you if you need sponsorship for where the opportunity is based.

## **Reward and recognition**

Our reward process is fair and consistent. We ensure that everyone's salary and benefits are equitable for the job that they do, in the country where the role is based. We use a recognised system to benchmark the salary range for all roles throughout the company. This helps us understand where each role sits in the bigger company structure - and from here, we work out the median pay bracket for each role. When a salary is based on the role and not a person, it's a much fairer process for everyone.

We review the salary range and overall package when we initially scope out a new role. Once agreed, this then flows into our salary and remuneration review process. This makes sure that we are paying people fairly for the job that they do - and that it's reviewed regularly. We also undertake regular "pay audits" which show us trends and patterns to identify roles that can be above or below market pay; ensuring again that we pay people fairly for the job that they do.

We know that there is a wider systemic problem when it comes to fair pay between genders. To make sure we're doing the right thing, we run a gender pay gap analysis each year to highlight anything we need to adjust. We do not (and will not) ever pay someone differently based on their gender.

## **Learning and development**

We believe that everyone should have access to both personal and professional learning and development opportunities. We'll monitor our schedule (and delivery) of learning activities to make sure that everyone has the same opportunity to take part.

Our content, learning partners and learning platforms will endeavour to provide inclusive learning. As we all learn in different ways, we naturally will have different preferences when it comes to learning. We'll make sure that the accessibility of our programmes, the content, and our partners reflect our approach to diversity, equity, and inclusion. If you have specific requirements, we will make reasonable adjustments. This may include arranging for a sign language interpreter to attend a programme, adjustable fonts, colour schemes, and easy to read captioning on our e-learning platform. We'll aim to offer structured courses on a variety of days of the week to ensure that everyone can attend. We'll also provide a variety of learning content "on demand" so you can learn at your own pace and at a time that suits you best.

### **Performance management and reviews**

We have a performance management framework that gives everyone the opportunity to have regular check-ins and get feedback on performance - and to discuss future career aspirations.

We'll ensure that everyone receives feedback on their performance, knows their progress against any goals that have been agreed, and how they are performing against our values and behaviours. The tools that we use are clear, developed in partnership with the business - and available to everyone. The process will provide you with the opportunity to raise your own thoughts on your progress with your manager. As a manager, you will have training to help you provide great feedback and facilitate valuable conversations with your team.

### **Internal mobility**

We want to make sure that everyone in our company can grow and develop their career with us. It might be a promotion in your team, a sidestep to a new department - or you might want to take an entirely new direction! We want to support you and we will do everything we can to help you along the way. Our approach to internal mobility is transparent - all roles are available to research or apply for on Greenhouse via our internal careers board. Each internal application is reviewed by multiple people before we decide on next steps - this includes Talent Acquisition, People Experience, and hiring managers for the role.

### **Promotions**

We have an internal career levelling approach, and every role is levelled within our STAGES framework. We will regularly review our roles within the STAGES framework to ensure that roles are assigned to the right level. The framework considers the size and complexity of the role, the scope, expertise, and experience that is required, the level of responsibility of budget, of relationships, influence, decision making and longer-term planning. It is focused on the role, not on the individual so that we can keep things fair. Your role may be reviewed and re-levelled if it has changed, grown in complexity, size, or with greater levels of responsibility or resource.

We will never discriminate against you and your suitability for a role or your eligibility for a promotion - all decisions we make will be based purely on the level of the role, your skills, experience and demonstration of our behaviours and values.

### **Saying goodbye**

If you decide to leave us, we only share standard employment references with your new employer. The reference confirms the dates you worked with us and your job title. We don't offer informal or personal references or share any details on your performance, absence, health, or wellbeing.

## Supporting people with disabilities

Disabilities can happen at any time. If you currently have a disability (or if something changes for you in the future) please let us know. We promise to make reasonable changes or adjustments to help reduce any difficulties you might face.

We'd suggest that talk to your manager first - and our People team are also available if you need our advice. We may need to seek medical advice about how to best support you and if we can't make a specific adjustment work, we'll explain why and try to find another option.

We want our offices, meeting spaces and event venues to be accessible to everyone, no matter what your circumstances. We'll check them regularly and do our very best to improve things.

## Making a complaint

If you feel like you're discriminated against, you can use our formal grievance procedure at any time. Before taking things further, we'd ask you to reflect on what's happened and decide if your complaint is something you are comfortable raising informally first. If you feel you can, we'd advise you to approach the person who is doing or saying something to make you feel uncomfortable - either yourself (or with a colleague.) Give them the feedback and explain what you find offensive and unwelcome - and let them know you'd like it to stop straight away.

If you don't feel this is right for you (or if things are too serious) please go straight to the grievance procedure. For discrimination, bullying or harassment grievances you can choose whether to raise it with your manager, our People team, the Inclusion Council - or another leader in the business. We'll protect you from any victimisation or retaliation and we'll take your grievance very seriously.

If we find someone has breached this policy, we'll use our disciplinary procedure to manage this. Serious cases will be seen as gross misconduct and we can dismiss people from the business for this reason. It's also worth pointing out that we also treat malicious, spiteful, and deliberately false grievances as gross misconduct.

## Further reading and related policies

All the policies related to this document can be accessed through in Bob under the "Documents" section. We'd encourage you to familiarise yourself with them and let us know if you have any questions.

## Change control

Name of policy	Our Approach to Inclusion
Version Number	1.0
Effective date	February 2021
Next review due	December 2022
Notable changes from previous policy	New policy
Policy owner	Chief People Officer