

DIVERSITY AND INCLUSION POLICY

1. INTRODUCTION

1.1 PURPOSE

1.2 SCOPE

All permanent and fixed term employees, contractors, clients and individuals coming on to Company premises.

This policy is for guidance purposes only and does not form part of your contract of employment. ICG may, at its absolute discretion, amend this policy from time to time.

2. POLICY STATEMENT

As a Company operating in numerous countries around the world, we believe diversity brings benefits for our stakeholders, our business and our people. We believe a connected workforce that reflects the communities where we operate bringing different ideas and perspectives help us to continue to innovate and grow the business in a sustainable way.

We expect our people to treat each other with dignity and respect, creating an inclusive culture to support equal opportunities. We do not tolerate discrimination, bullying, harassment and victimisation on any ground, including age, race, ethnic or national origin, colour, mental or physical health conditions, disability, pregnancy, gender, gender expression, gender identity, sexual orientation, marital status or other domestic circumstances, employment status, working hours or other flexible working arrangements, or religion or belief.

Our commitment reflects the provisions of both the Universal Declaration of Human Rights (the UDHR) and the International Labour Organization Declaration on Fundamental Principles and Rights at Work (the ILO Declaration), including freedom of association.

3. OVERVIEW

The Policy covers the following:

- Diversity vs Inclusion
- Forms of discrimination
- Recruitment and selection
- Promotion and career development
- Appropriate behaviour
- Promoting and communicating equality and diversity
- Complaints of discrimination

4. RELATED POLICIES AND DOCUMENTATION

- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Harassment and Bullying Policy and Procedure
- Speak up Policy and Procedure

5. POLICY DETAILS

5.1 Diversity vs Inclusion

Diversity and inclusion often go hand in hand but are different from one another. We need therefore to consider both in our people management practices and strategies.

Diversity is about recognising difference. It's acknowledging the benefit of having a range of perspectives in decision-making and the workforce being representative of our clients and the location in which we operate.

Inclusion is where people's differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in place and enables a diverse range of people to work together effectively.

5.2 Forms of Discrimination

Discrimination can take a variety of forms including direct discrimination, indirect discrimination, harassment, victimisation and, for those with a disability, discrimination arising from disability and a failure to make reasonable adjustments. A brief summary of each of these is set out below.

In the UK, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, are 'protected characteristics' covered by discrimination law to give people protection against being treated unfairly.

Direct discrimination – occurs where a person is treated less favourably than another person because:

- they have a protected characteristic;
- they are thought to have a protected characteristic;
- they associate with someone who has a protected characteristic.

Indirect discrimination – occurs when a provision, criterion or practice that applies to everyone but adversely affects people with a protected characteristic more than others and cannot be justified.

Discrimination arising from disability – occurs where a person is treated unfavourably because of something arising in consequence of their disability and that treatment is not justified.

Failure to make reasonable adjustments – occurs where the Company fails to take such steps (adjustments) as are reasonable to alleviate disadvantages caused by a disability.

Harassment - occurs when unwanted conduct related to a relevant protected characteristic takes place with the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve physical acts or verbal and non-verbal communications and gestures. Harassment is dealt with in our anti-harassment and bullying policy.

Victimisation - occurs when an employer subjects a person to a detriment because the person has carried out (or the employer believes they have or may have carried out) what is referred to as a 'protected act'.

Definitions of 'protected characteristics' vary per location and if there is any conflict between the procedures set out in this policy and local legislation, then local legislation will prevail. For example, some or any of the steps or procedures set out in this policy may not be required under local legislation, and therefore ICG will follow local legislation where appropriate.

5.3 Recruitment and selection

The Company recognises the benefits of having a diverse workforce and will take steps to ensure that:

- it endeavours to recruit from the widest pool of suitably qualified candidates possible and requesting diverse shortlists from third party partners;
- employment opportunities are open and accessible to all on the basis of their ability, skills, experience, appropriate qualifications and aptitude for the job;
- all recruitment agencies acting for the Company align with our equality and diversity requirements and their own requirement not to unlawfully discriminate;
- all recruiting managers are trained and developed to ensure that their own individual 'unconscious bias' is noted and recognised so that they can consciously make recruitment decisions based on skill set, role knowledge and potential, track record and evidence of performance rather than any other factor.

5.4 Promotion and career development

Promotion within the Company is made without reference to any of the protected characteristics and will be based solely on merit, looking at performance, potential and on the parameters/scope of the role.

The selection criteria and processes for recruitment and promotion will be kept under review to ensure that there is no unlawful discriminatory impact on any particular group which cannot be justified.

While positive action measures may be taken in accordance with the relevant anti-discrimination legislation to encourage under-represented groups to apply for promotion opportunities, recruitment or promotion to all jobs will be based solely on merit.

All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities. The Company may take appropriate positive action (as permitted by the anti-discrimination legislation) to provide special training and support for groups which are under-represented in the workforce and encourage them to take up training and career development opportunities.

5.5 Appropriate behaviour

It is expected that everyone in the Company will conduct themselves in an appropriate manner, which can be characterised by:

- treating others with dignity, trust and respect;
- having an awareness of the effects our behaviour may have on others;
- working collaboratively to achieve objectives;
- communicating openly and honestly, clearly stating what we mean and what we expect of others;

- giving and receiving constructive feedback as part of normal day-to-day activities, that is evidence based and delivered appropriately;
- starting from the assumption that everyone is working to the best of their abilities, taking account of their current stage of their professional development;
- highlighting and speaking up about any unacceptable behaviour (including bullying, harassment and victimisation) that they experience or observe. This may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person's distress or discomfort. Unacceptable behaviour does not have to be face-to-face, and may take many forms such as written, telephone or email communications or through social media. Unacceptable behaviour will be dealt with under the processes set out in our Anti-harassment and bullying policy.
- ensuring all senior management and line managers set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives in relation to equal opportunity, diversity and inclusion.

5.8 Promoting and communicating equality and diversity

This policy is published on Connected and is also available to job applicants on the Company's website.

All those who act on the Company's behalf will be informed of this policy and will be expected to comply with it.

In all its dealings, with clients and other third parties, the Company will seek to promote the principles of diversity & inclusion.

The Company will make every effort to reflect its commitment to diversity, inclusion and equality in its marketing and communication activities where appropriate.

5.9 Procedure for Making a complaint

Complaints of this nature will be taken very seriously. Most complaints can be resolved informally. As a first step, you should discuss your complaint informally with your manager and together you should attempt to resolve this. Either you or the manager may ask HR to assist with resolving matters. If an informal resolution is not possible or is not reached, the aggrieved party may invoke the formal procedure.

If your complaint is about your direct manager, you should raise it with their manager or with HR.

6.1 IMPLEMENTING THE POLICY

6.1.1 Responsibility and implementation

The CEO supported by the ED, Chief People & External Affairs Officer have overall responsibility for the effective implementation and operation of this policy. All senior Management within the Company are expected to support them in this. This policy is also supported by the Company's Diversity and Inclusion Champions Group and HR team.

All management and employees of the Company are expected to pay due regard to the provisions of this policy and should ensure compliance with it when undertaking their jobs or representing the Company.

Acts of unlawful discrimination by employees or others may result in disciplinary action, which in serious cases could result in summary dismissal. Please see our Disciplinary Policy for more information. Failure to comply with this policy will be treated in a similar fashion.

Acts of unlawful discrimination by those acting on behalf of the Company will lead to appropriate action, which may include termination of services where appropriate.

6.1.2 Complaints of discrimination

The Company will investigate all complaints of unlawful discrimination made by employees, clients or other third parties in relation to the Company and take action where appropriate. All complaints will be investigated in accordance with the Company's grievance or complaints procedure and the complainant will be informed of the outcome.

There will be no victimisation or retaliation against employees who complain about discrimination please see the Speak Up Policy for further information. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Company's Disciplinary Policy & Procedure.

6.1.3 Monitoring

The Company monitors gender and ethnicity and uses this data to inform its Global strategies and initiatives in order to:

- a. Assess pay gaps and publish gender pay gaps;
- b. Review the diversity of shortlists for recruitment/promotion and identifying areas of underrepresentation for particular groups;
- c. Identify particular individuals within a particular diversity strand to invite them to participate in specific initiatives, training programmes, consultation groups etc;
- d. Identify individuals/groups for mentoring schemes and to match them with mentors;
- e. Promote particular resources to individuals within a particular group.

7. RESPONSIBILITY

All those persons referred to within the scope of this policy are required to adhere to its terms and conditions.

Individual managers are responsible for ensuring that this policy is applied within their own area. Any queries on the application or interpretation of this policy must be discussed with HR prior to any action being taken.

The HR department has the responsibility for ensuring the maintenance, regular review and updating of this policy.

Revisions, amendments or alterations to the policy can only be implemented following consideration and approval by the ED, Chief People and External Affairs Officer.