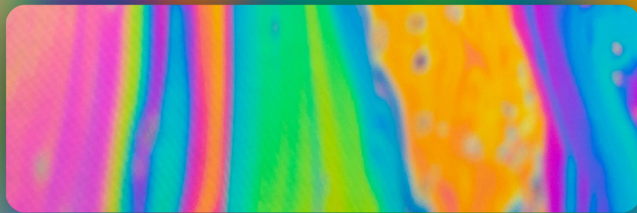
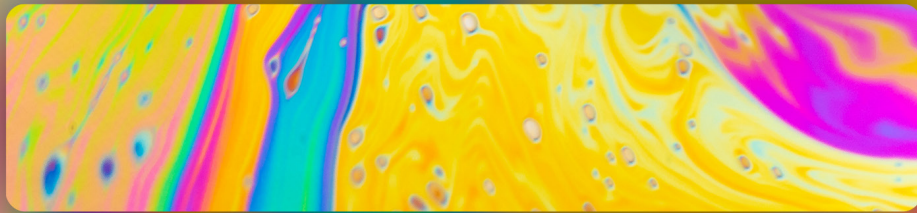


Equity, Diversity and Inclusion Policy and Framework



We believe that when you feel encouraged to be the most authentic version of yourself, you are more creative, passionate and successful. That's how we inspire better outcomes everyday.

BE YOURSELF. WE'RE BETTER THAT WAY

INTRODUCTION

At Fintel, we are fortunate to have a team of brilliant individuals who bring their unique perspectives, experiences, skills, and ideas to help us achieve our collective purpose of inspiring better outcomes. Fostering an inclusive culture is instrumental in harnessing the diverse range of these perspectives, creating a happier, more engaging, and productive working environment for all of us.

Our aim is to have a thriving workforce that authentically reflects the world around us, where every person feels respected and empowered to give their best.

This policy will ensure that:

1. All in our employment are treated fairly, with dignity and respect.
2. No form of unlawful discrimination, intimidation, bullying or harassment is tolerated.
3. Equity, diversity and inclusion are built into all aspects of employment lifecycle, with all employment policies, procedures and practices continually monitored and reviewed to ensure fairness.
4. Individual differences and the contributions of all employees are encouraged, recognised and valued.

To support this inclusive culture, this policy:

- outlines our commitment throughout the employment lifecycle to equity, diversity and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of our people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

SCOPE

This policy applies to anyone working for Fintel. This includes employees, workers, contractors, volunteers, interns and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

Contents

- 02 INTRODUCTION
- 04 WHAT IT MEANS TO US
- 05 COMMITMENTS AND EXPECTATIONS
- 06 DEFINITIONS
- 08 OUR EQUITY, DIVERSITY AND INCLUSION FRAMEWORK

10 REDUCED INEQUALITIES



PROMOTE UNIVERSAL SOCIAL, ECONOMIC AND POLITICAL INCLUSION

The United Nations Sustainable Development Goals (“UN SDGs”) have been adopted to drive positive change globally.

As a business sitting at the heart of the UK retail financial services market, we recognise the importance of our contribution in working towards these commitments.

This policy sets a framework which will help us to contribute towards SDG 10.2: “By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status”.



What it means to us

We firmly believe that every individual should feel included, valued, and empowered to contribute their unique perspectives and talents.

By embracing diversity, equity, and inclusion, we enhance our organisational resilience and adaptability and open ourselves to a wide range of perspectives, experiences, and ideas. This diverse pool of insights fuels innovation, sparks creativity, and enhances problem-solving capabilities.

Together, these pillars help us to create an environment where everyone can thrive, fostering a sense of belonging and driving better outcomes for our organisation and beyond.

DIVERSITY

Diversity is the vibrant blend of unique perspectives, experiences, and identities that come together to form the heart and soul of our organisation.

It fuels innovation, strengthens decision-making, and creates a culture of belonging where everyone can thrive.

By embracing diverse identities and fostering inclusion, we unlock our true potential and inspire better outcomes.

INCLUSION

Inclusion is the foundation of a thriving and united organisation, where every individual's voice is heard, valued, and embraced.

It means amplifying underrepresented voices, supporting diverse leadership, and fostering a sense of community that embraces and celebrates the richness of our differences.

By championing inclusion, we unlock the full potential of our diverse team, inspiring better outcomes and fostering a sense of collective empowerment.

EQUITY

Equity is the guiding principle that ensures fairness and equal opportunities for all within our organisation.

It goes beyond equality, addressing systemic barriers and empowering individuals to thrive.

By championing equity, we inspire better outcomes and create a culture where everyone can contribute their unique talents to our shared success.

BELONGING

Belonging is the vital essence that fuels our organisation's success.

It is the inclusive and accepting environment where every person feels valued and empowered to contribute.

By fostering belonging, we inspire better outcomes, as individuals bring their unique perspectives and talents to drive our collective achievements.

Commitments and expectations

- WHAT WE EXPECT FROM YOU:
- We expect you, and every one of our people, to:
- Take personal responsibility for observing, upholding, promoting and applying this policy.
 - Treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.
 - Support us in embedding such values by constructively challenging inappropriate comments or ways of working. By doing so, you can help us achieve and maintain a truly inclusive workplace culture.
 - Ensure that any dealings that you have with colleagues or third parties is free from any form of discrimination, harassment, victimisation or bullying.

Our culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility we all share.

Cultivating this culture does not happen by accident and requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or others) often translate to biases, challenges and barriers that may not be faced by others. The more areas of difference a person brings, the more this effect can be compounded. In this way, the experiences of a black woman with a disability may be very different to the experiences of a black woman without a disability and also very different from the experiences of a white woman. This way of looking at diversity and inclusion is known as "intersectionality".

If any of our people is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary procedure.

You should also be aware that you can be personally liable for discrimination and harassment.

OUR COMMITMENT TO YOU

Our commitment to you is rooted in the belief that an environment of equity, diversity, and inclusion not only enriches our organisation but also fosters well-being and enables our people to thrive authentically and feel a strong sense of belonging. We are dedicated to cultivating a working culture that upholds principles of dignity, trust, and respect, and one that strictly prohibits discrimination, harassment, bullying, or victimization.

We take pride in ensuring that our recruitment, promotion, and retention processes are solely merit-based, ensuring that all individuals are treated fairly and not subjected to any form of unfavorable treatment based on protected characteristics. We value the diverse perspectives and contributions of each individual, and our commitment to equity, diversity, and inclusion underpins all aspects of our workforce.



Definitions

DISCRIMINATION

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception (see definitions below).

There are also two specific types of discrimination that apply only to disability: “discrimination arising from disability” and “failing to make reasonable adjustments”.

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person’s general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as “unconscious bias”). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- using different standards for different groups of employees to judge performance.

DIFFERENT TYPES OF DISCRIMINATION UNDER THE EQUALITY ACT 2010

Direct discrimination:

Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic, e.g.: choosing not to recruit someone because they are disabled and you think they “wouldn’t fit in” to the team).

Indirect discrimination:

Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.

Associative discrimination:

Treating someone less favourably because they are associated with someone who has a protected characteristic, e.g.: because their partner is transgender.

Discrimination by perception:

Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

Discrimination arising from disability:

Treating someone unfavourably because of something connected with that person’s disability and where such treatment is not justified. Examples include:

- dismissing or failing to pay a bonus to someone because of their disability-related absence; or
- disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.

Failing to make reasonable adjustments:

Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer’s premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:

- allocating some of the disabled person’s duties to a colleague;
- changing their working hours or place of work;
- adjusting procedures for assessing job candidates; and
- modifying disciplinary and grievance procedures.

HARASSMENT AND SEXUAL HARASSMENT

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else’s dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

VICTIMISATION

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

BULLYING

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person’s protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

We take allegations of bullying or harassment very seriously. Anyone who feels they have been subjected to any kind of bullying or harassment should report this to their line manager or a member of the HR team immediately.



Our Equity, Diversity and Inclusion Framework

BETTER TOGETHER FORUM

We are proud to provide a forum for people who have a passion for, or a connection with, a particular aspect of equity, diversity and inclusion.

The aim of this forum is to:

- provide networking opportunities and community support;
- organise activities and events to raise awareness and provide education; and
- contribute ideas and suggestions for ways the organisation can be more diverse and inclusive.

EQUALITY OF OPPORTUNITY

Recruitment

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way and must be up to date with their annual mandatory diversity and inclusion training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

Career development

Any decision made relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

We continue to seek out ways to improve the diversity of our workforce through engagement with our Inclusivity Forum and our team more widely. Suggestions and feedback are always welcome so please do share any views or ideas you have with a member of the HR Team.

DISABILITY INCLUSION

Recruiting people with a disability

We will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include (for example):

- ensuring easy access to the premises for an interview
- adapting psychometric tests/replacing psychometric tests with an alternative option
- providing an alternative to a telephone interview for a deaf candidate
- providing a suitable chair for an interview with a candidate suffering from back problems.

If you are involved in the interview process, you must not ask job applicants about their health or disability except with prior approval from the People & Operations Director. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

Talking about disability

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

Reasonable adjustments

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and potentially refer you to our Occupational Health provider to help us get the right support in place.

For colleagues who are returning from long-term disability-related absence, you may benefit from a phased return or reasonable adjustments being implemented, either on a temporary or permanent basis. Please discuss with your line manager if you feel this would support you in making a return to work.

Support

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice. Details of how to access this service are available on the Fintel Flexible Benefits Portal.

Accessibility

Accessibility tours enable our organisation to gain a better insight into accessibility issues from the perspective of the person with a disability.

If you experience accessibility issues due to your disability, for example because of aspects of our premises or because you do not have adaptive equipment to help you perform your role, please contact the Operations Manager to arrange an accessibility tour.

TRAINING

If you are involved with making decisions about a person's employment, you must attend appropriate equity, diversity and inclusion training.

All new starters must attend equity, diversity and inclusion training as part of their onboarding programme, and this training is repeated on an annual basis for all employees.

We expect all our people to proactively support our equity, diversity and inclusion initiatives by attending events and workshops organised by the Inclusivity Forum to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

MONITORING AND REVIEW

We monitor and analyse workforce diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equity, diversity and inclusion strategy.

If you require this document in an alternative format, please contact the HR team: H.Support@fintelplc.com

Our commitment to equity, diversity and inclusion is at the core of our business. By fostering a culture where everyone feels valued, respected, and empowered, we create an environment where individuals can be their authentic selves and contribute their best. Through this dedication, we inspire better outcomes, cultivate a sense of belonging, and build a stronger, more inclusive future for all.

Version	Description of changes	Approved by	Date
1.0	New Policy (to replace Equal Opportunities & Dignity at Work)	Fintel plc Board of Directors	28/06/2023

