

Public

Diversity, Equity and Inclusion Policy

PURPOSE

- ▶ This policy, in accordance with our values and 'One Firm' principle, sets out the Company's commitment to provide an inclusive working environment and to promote a culture that values Diversity and Equity, in which employees are able to realise their full potential and contribute to the success of the business.
- ▶ This policy explains how the Company aims to deliver on this commitment by promoting Diversity and Equity in its employment practices.
- ▶ This policy establishes the Company's overarching principles in all areas of its employment practices, including attraction and recruitment, selection, engagement, development, training, reward and retention. Local policies and practices should be referred to where these are in place for specific guidance on local market practice and any local legislation.

All employees have a duty to be aware of this policy and are expected to behave and act in accordance with it.

SCOPE

This policy applies to all companies in the Control Risks Group ("Control Risks" or the "Company"). Control Risks Group shall be defined as Control Risks International Limited and its subsidiaries and branches.

SUPPORTING DOCUMENTS AND CONTACTS

Relevant documents

Employees are encouraged to refer to the Behaviour and Dignity at Work Policy which sets out the Company's expectations of behaviour to create an inclusive working environment. It also includes guidance regarding allegations of bullying or Harassment. Employees can refer to the Grievance Policy regarding the handling of employee complaints.

Contacts

If you are in any doubt about how to apply this policy, please speak to your manager or a member of the Human Resources Team.

If you become aware of any breach of this policy, or suspected breach, we hope that you will feel comfortable talking to your manager. However, if that's not the case please use the Control Risks Whistleblower Hotline.

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1. DEFINITIONS

► **Table 1: Definition**

Characteristics	for the purpose of this policy Characteristics refers to sex, race (including colour, nationality, national or ethnic origin), marriage or civil partnership status, pregnancy or maternity, gender identity or expression, sexual orientation, age, religion or belief and disability.
Direct discrimination	occurs when someone is treated less favourably because of their Characteristics.
Diversity	refers to difference and is therefore a broad concept encompassing inherent traits, Characteristics, skills, life experiences and backgrounds.
Equity	is concerned with fairness and equitable treatment, identifying and eliminating barriers so that no one group is given preferential treatment through actions, processes and systems.
Inclusion	is about actively working to create an environment that recognises the strengths each individual can bring, whatever their differences. It's about both valuing and leveraging the different skills and talents of our colleagues – making them feel valued and part of a team.
Indirect discrimination	occurs where an unjustifiable requirement or condition is placed on a job, the effect of which is that fewer people sharing a Characteristic can comply with it.
Harassment	is unwanted conduct or comment directed towards an employee (or group of employees) which is regarded as unwelcome and offensive by the recipient. This may be related to a Characteristic which undermines the dignity of the recipient, who may feel degraded, undermined or humiliated. Harassment is dealt with further in our Behaviour and Dignity at Work Policy.
Victimisation	Where a person is singled out for unfavourable treatment because they have made a complaint under this (or a related) policy, have brought proceedings relating to discrimination, or they have supported someone else who has raised a grievance or issued proceedings.

2. POLICY REQUIREMENTS

2.1 Our commitment to Inclusion, Diversity and Equity

In accordance with our values and 'One Firm' principle, the Company aims to foster an inclusive culture, in which employees are able to realise their full potential and contribute to the success of the business. Our approach to Diversity, Equity and Inclusion is underpinned by our belief in the importance of treating each other fairly and with respect and that the best ideas come from a diverse pool of knowledge, generated by a range of backgrounds, skills and experiences.

The Behaviour and Dignity at Work Policy establishes standards of behaviour everyone at the Company is required to adhere to, in their interactions with each other and with third parties, in the course of their employment. It makes it clear to all employees that the Company will not tolerate the Harassment or bullying of one employee by another and provides procedural guidance to complainants.

The Company has a range of initiatives in place to support its Diversity, Equity and Inclusion aims. These are reviewed regularly by the Group Executive Committee using internal data, research and external market findings to monitor progress. Our Diversity, Equity and Inclusion forums and People Networks, such as Synergy, the Women's Network and Mosaic play a key role in helping to shape our approach.

Specifically, to promote Equity in the workplace, Control Risks aims to ensure that individuals;

- ▶ receive equal treatment in all aspects of engagement with the Company, unless there is reasonable justification to do so otherwise and;
- ▶ are not disadvantaged or treated less favourably by a condition or requirement which cannot be reasonably justified and;
- ▶ are not subjected to any form of discrimination (whether Direct discrimination or Indirect discrimination) or Victimisation regardless of their Characteristics.

2.2 Attraction and recruitment

We aim to ensure our recruitment and selection processes promote Diversity and provide candidates with equal opportunities. We aim to do this through the following actions:

- ▶ Individuals will be appointed on the basis of capability and potential, as well as competence and behaviours required for the role as set out in job descriptions.
- ▶ Reviewing our recruitment processes on an ongoing basis to ensure applicants are given fair and consistent treatment based on merit and abilities.
- ▶ Taking steps to ensure that our vacancies are advertised to a diverse labour market.
- ▶ Mitigating unconscious bias through guidance and education.

- ▶ Only particular qualifications or requirements that are needed for the safe and effective performance of the job concerned will be specified in our job descriptions and advertisement.
- ▶ Assessments will only cover the applicant's suitability for employment and their ability to fulfil the requirement of the job.
- ▶ By taking the above steps, we aim to ensure that no prospective applicants are subjected to discrimination because of any of the Characteristics set out above.

2.3 Employment terms, reward and benefits

The Company aims to provide terms and conditions of employment, access to benefits, training and other facilities that are aligned to local and market practices and that provide equal treatment, unless there is reasonable justification to do otherwise. By taking these steps, we aim to ensure that no prospective applicants are subjected to discrimination because of any Characteristics.

2.4 Career development

The Company is committed to providing equal opportunities for career development and promotion to all aspects to all employees. We aim to do this through the following actions:

- ▶ Managers will continually assess the potential of all employees.
- ▶ Promotion decisions will be made in accordance with objective selection criteria.
- ▶ Unconscious bias will be mitigated through guidance and education.
- ▶ Internal vacancies will be advertised.
- ▶ Employees will be encouraged to discuss their career prospects and development needs with their manager.

By taking the above steps, we aim to ensure that no employees are subjected to discrimination because of any Characteristics they may have.

2.5 Making a complaint

If an individual believes that they have unjustifiably been subject to unequal treatment, including discrimination or inequity on the grounds of a Characteristic, they should refer to the Company's Grievance Policy which outlines both the informal and formal routes in which to take further action.

The Behaviour and Dignity at Work Policy provides information on bullying and Harassment and further detail on the informal routes available to manage such complaints.

In cases where the employee does not feel the issue can be addressed within the management structure and/or through HR they should refer to the Whistleblowing Policy for information on how to access the Whistleblowing Hotline.

2.6 Record keeping and monitoring the Company's compliance

Within the framework of the law, the Company is committed, where practicable, to achieving and maintaining a workforce which broadly reflects the communities in which it operates. The Company will keep such records as are necessary to ensure that the policy is effectively monitored and maintained, which will be in compliance with all necessary legislation in each jurisdiction. All aspects of Human Resources policies and processes will be kept under review to ensure that they operate in a non-discriminatory manner.

2.7 Suppliers, subcontractors and other third parties

The scope of this policy is extended to suppliers, subcontractors and other third parties associated with the Company in dealing with this matter; Control Risks will not tolerate any form of discrimination, Harassment or Victimisation involving but not restricted to employees and subcontractors, suppliers or clients with whom it has contact.

Any employee found to be in breach of the policy in their dealings with a third party will be subject to the Company's local Disciplinary procedures.

If an employee believes they have been a victim of discrimination or Harassment by a third party they should inform their line manager in the first instance. Depending on the nature of the complaint, an investigation may be conducted, and any necessary actions will be taken against the third party.

3. AUTHORITY AND RESPONSIBILITY

All Control Risks Employees must:

- ▶ Adhere to the principles within the policy, and not induce or attempt to induce others to engage in any practice that may breach the policy.
- ▶ Notify and seek advice from their line manager in cases of uncertainty about how to apply any aspect of this policy.
- ▶ Raise concerns about any behaviour/conduct/practice they deem to be in breach of this policy with their line manager in the first instance. If the concern relates to the line manager, it should be escalated within the management structure or Human Resources.

All people managers are responsible for:

- ▶ The implementation of this policy with their teams.
- ▶ Promoting Diversity, Equity and Inclusion in accordance with this policy.
- ▶ Taking preventative measures to ensure the policy is not breached and taking prompt action to deal with any situations that may arise.

Group Exco

- ▶ The Group Executive Committee has overall responsibility for providing leadership on the Diversity, Equity and Inclusion strategy, as well as the effective implementation of this policy and for ensuring compliance.