

Aberdeen Diversity, Equity & Inclusion Policy (global)

September 2024

What is this policy about?

This policy covers our approach to Diversity, Equity and Inclusion at Aberdeen.

Who is this policy for?

The Diversity, Equity & Inclusion Policy applies to all Aberdeen Board members, and colleagues including consultants or contractors provided through a third-party supplier globally.

Our principles also apply to how we engage with job applicants, business partners, customers, clients and any other people associated with Aberdeen.

Policy Governance

This policy is reviewed at minimum 2-yearly. Our Nomination committee has oversight for DEI across Aberdeen Group plc.

We are committed to building a business that attracts brilliant talent; a business where all our people can thrive and belong, learn and develop and do their best work.

We have an inclusive workplace where all forms of difference are valued; an environment which is free from any form of unfair or unlawful treatment.

We define diversity in its broadest sense¹ and support a culture that values fairness and transparency. This is at the heart of our cultural Commitments. We support the right of all people (colleagues, workers, candidates, customers, clients, and 3rd parties) to be treated with respect and dignity.

When does this policy apply?

It applies to all conduct at work and at related outside events, meetings or social situations. The principles also apply to views shared on social media in relation to colleagues, workers, anyone associated with Aberdeen or anything linked to or impacting our Company reputation.

¹ this includes but is not limited to our diversity of educational, professional and family backgrounds, experience, cognitive and neurodiversity, mental health, age, gender, gender identity or expression, marital or civil partner status, sexual orientation, disability or long-term health conditions, religion or belief, caring and parental responsibilities, and ethnicity and geographical origin.

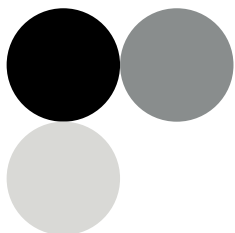
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Diversity and Inclusion Principles

We encourage and value a diverse workforce across the Company, including our Board and Executive/Senior Leadership team (our 'management body'). Our Board has a **published statement** to drive diversity at Board level.

1. We do not tolerate any unfair treatment, discrimination or harassment (direct, indirect, harassment (including sexual harassment), victimisation or any other form of discrimination).
2. Diversity, Equity and Inclusion is considered at all stages of the colleague journey. We are committed to building a diverse workforce through inclusive talent attraction, acquisition, employment, development and engagement with the Company.
3. We treat each other fairly and respectfully and understand it is everyone's responsibility to create an inclusive workplace. To build an inclusive workplace we include colleague perspectives and co-create where possible. We do this through our Colleague Council, regular colleague surveys and our **colleague-led networks and communities**. We collaborate across the business globally to bring diversity of thought which helps us to be more effective for our clients and customers.
4. We treat everyone fairly based on their abilities and skills, regardless of any personal characteristics (whether actual, perceived or associated). These characteristics could include, but are not limited to, those protected in legislation in the countries where we operate. We comply with Inclusion, Diversity and Equality priorities, and local legislation and regulations in all countries where we operate. As a UK registered company, the relevant legislation which applies to our PLC Board on this subject is the UK Equality Act 2010.
5. All colleagues are responsible for ensuring they understand what constitutes unfair treatment and discrimination and that this is unacceptable, by completing (at minimum) annual mandatory learning on preventing discrimination and harassment at work. We also have a number of DEI resources including Unconscious bias training, available to our employees globally through online learning.
6. We set goals/targets to improve underrepresentation. These support our commitments to the **UK Treasury Women in Finance Charter** and are published for transparency, along with our plan for how we will meet them. The Nomination and Governance Committee oversees progress against these goals/targets.
7. Our Diversity, Equity and Inclusion goals, targets, and practices will be benchmarked to make sure what we are doing is relevant and best practice.
8. We will proactively make positive and reasonable changes to ensure equitable access to suitable opportunities and roles for those who have a disability or additional needs.
9. We collect diversity data where legally permissible and possible on our systems. Diversity data helps us identify whether we are attracting diverse candidates and where in our workforce diversity is lacking. It helps us monitor the effectiveness of our efforts to reflect the diversity of local working populations. Any diversity data is held confidentially in line with data protection or other relevant legislation in the countries where we operate. Information is used in an aggregated form for reporting and never reported in a way that identifies individuals.
10. Behaviours and actions which breach this policy may result in disciplinary action, up to and including dismissal, which will be taken in line with local legal requirements.

All leaders must make sure standards in this policy are followed and address any behaviour which goes against it. Local teams will put in place policies and processes to meet equality legislation and regulatory requirements as appropriate. They will listen and respond to concerns when they are raised, we take all complaints seriously and will take as much time as needed to deal with them fully and fairly.



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If you are a colleague and you either experience or witness something of concern

If you've experienced or witnessed unequal treatment, discrimination, bullying or harassment you should raise concerns at the first opportunity, without hesitation or fear of victimisation or retaliation. Even if the events happened some time ago, you should still report any concerns you have.

Speak to your manager if you have a concern to raise and feel comfortable in raising it with them.

If you wish to make a complaint about your employment or how you have been treated: you should raise this through your local grievance procedures. Please refer to your local Grievance Policy for more information about the approach we'll take to resolving concerns. Your local HR team will support you with the procedure for raising a concern.

If you feel you cannot raise your concern using your normal reporting line or wish to raise it anonymously: you should use our confidential Speak Up service.

Speak Up

Our company is committed to operating in an honest and transparent way. Our **Speak Up policy** is there to support those that wish to report any concerns around malpractice or misconduct.

We put the needs of our clients and customers at the centre of everything we do. This is why our Speak Up reporting line is open to our external stakeholders, as well as our colleagues.

Our independent and confidential Speak Up service is available 24 hours a day, seven days a week, in multiple languages. The service is managed by Safecall which is recognised as a leading global authority on all aspects of speaking up.

Contact Speak Up via the dedicated website
<http://www.safecall.co.uk/>

Appendix A: UK Equality Act 2010 definitions of discrimination, harassment, victimisation

(As a UK registered company, the UK Equality Act 2010 is relevant for our functions with PLC oversight including our Board, as well as applying to all UK based colleagues, workers and those associated with Aberdeen in the course of business).

Discrimination can come in one of the following forms:

- **direct discrimination** – treating someone with a protected characteristic less favourably than others
- **indirect discrimination** – putting rules or arrangements in place that apply to everyone, but that puts someone with a protected characteristic at an unfair disadvantage
- **harassment** – unwanted behaviour (physical, sexual, verbal or non-verbal conduct) linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them. It can be a one-off occurrence or something that's repeated
- **victimisation** – treating someone unfairly because they've complained about discrimination or harassment

Protected characteristics are characteristics which are protected by law. In the UK Equality Act 2010, there are nine protected characteristics. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.



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