



abrdn

Diversity & Inclusion Policy (global)

February 2022

What is this policy about?

This policy covers our approach to diversity and inclusion. It supports us to create an inclusive company.

Who is this policy for?

The Diversity & Inclusion Policy applies to all abrdn Board members, employees (referred to as colleagues) and workers, (including consultants or contractors provided through a third party supplier) globally.

The principles also apply to the treatment of job applicants, business partners, customers, clients and individuals associated with abrdn.

We're committed to providing an inclusive workplace where all forms of difference are valued and 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. We fully support the right of all people (colleagues, workers, candidates, customers and clients) to be treated with respect and dignity.

When does this policy apply?

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

¹ this includes but is not limited to our diversity of educational and professional backgrounds, experience, cognitive and neurodiversity, age, gender, gender identity, sexual orientation, disability, religion or belief and ethnicity and geographical origin

Diversity & Inclusion Policy (global)

Diversity and Inclusion Principles

1. We do not tolerate any unfair treatment or discrimination (direct, indirect, harassment, victimisation or any other form of discrimination).
2. We encourage and value a diverse workforce at all levels in 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. We value diversity and inclusion in the partners who work with us.
3. Diversity and inclusion is central to all stages of recruitment and talent management. We proactively build a diverse workforce through inclusive talent attraction, acquisition, employment, development and engagement with the Company. We always appoint on the basis of merit.
4. 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 experience and co-create where possible. We do this through colleague surveys, colleague-led networks, our employee forum and other groups. We collaborate across regions and business areas to bring diversity of thought which helps us be more effective for our clients and customers.
5. We treat everyone fairly based on ability and skill, 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 that we operate in. As a UK registered company, the relevant legislation which applies to our PLC Board on this subject is the UK Equality Act 2010.
6. All colleagues are responsible for ensuring they understand what constitutes unfair treatment and discrimination and that this is unacceptable, by completing bi-annual mandatory learning on preventing discrimination and harassment at work.
7. As part of our commitment to diversity and inclusion we have a current focus on gender and ethnicity as priorities. We set targets to improve the underrepresentation of women in our management body and the Board, and to improve the underrepresentation of ethnic minority Board members. 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 targets. In the event they're not met, they capture reasons for this along with actions to remedy.
8. We will make positive and proactive reasonable changes to ensure equitable access to suitable opportunities and roles if you have a disability or additional needs.
9. We will collect diversity data where legally permissible and possible on our systems. Diversity data helps us identify whether we are attracting diverse candidates and if we have a diverse workforce. It helps us monitor the effectiveness of our efforts to reflect the diversity of local working populations. Any diversity data will be held confidentially in line with data protection or other relevant legislation in the countries where we operate. Information will only be used at an aggregated anonymised level for reporting purposes.
10. Our diversity and inclusion objectives and practices will be benchmarked to make sure what we are doing is relevant and best practice.
11. Behaviours and actions which breach this policy may result in disciplinary action for colleagues, up to and including dismissal, which will be taken in line with local legal requirements.

How to raise an issue

Everyone has a responsibility to behave fairly and professionally and respect individual differences. What one person finds acceptable could offend someone else or be considered discriminatory. If you have an issue you want to raise, the most effective way of reporting your concerns will depend on your circumstances.

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

If you've experienced 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. Please refer to your local Grievance Policy for more information about how to resolve informally or formally. Your local HR team will support you with the procedure for raising a concern.

Diversity & Inclusion Policy (global)

Managers 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. These make sure everyone is clear about how to report concerns, and include descriptions of what discrimination, harassment, and victimisation are.

If you experience something of concern and do not feel able to raise this with your manager (for example, if they are involved), you can raise this with a more senior manager or directly to HR. See your local Grievance Policy for more detail. If you witness or become aware of discrimination or harassment, you must report your concerns even if you are not directly involved. You can use the **'Speak Up' Whistleblowing Policy** to raise these concerns anonymously.

If you are not a colleague (eg contractor, client, business partners, candidate, agency worker) but you experience or witness something of concern

If you have any concerns about actions or decisions made that go against the principles and standards set out in this policy then please inform your contact at abrdn. If for any reason you feel unable to raise your concern with your abrdn contact or you wish to remain anonymous, then you can use our confidential 'Speak Up' service. All concerns raised are taken seriously and the identity of anyone raising a concern will be kept confidential. Our 'Speak Up' service is managed by Safecall, which is independent from abrdn and recognised as a leading global authority on all aspects of whistleblowing.

Contact Speak Up via the dedicated website www.safecall.co.uk/report.

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 abrdn 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 put someone with a protected characteristic at an unfair disadvantage
- harassment - unwanted behaviour (physical, 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.