



The Exeter
Inclusion & Diversity Policy (“the Policy”)

Introduction

We are committed to developing a working environment that is fair and inclusive, enabling all employees to make individual and valuable contributions to the business. We are also determined to ensure that we extend this same openness to all our members, suppliers, business partners and the communities in which we operate.

All of our employees throughout the business are expected to help to create a positive working environment by supporting colleagues and treating others with respect, dignity and courtesy. We expect our managers to exercise leadership in this field by discouraging prejudice, and to lead by example through their own behaviour.

This policy outlines our approach to inclusion and diversity within the Society and what we expect of all employees to support and uphold our principles. It applies to all employees across the Society. The policy also applies to contractors, agents, consultants or any others working for or on behalf of The Exeter.

Inclusion	Diversity
<p>Inclusion is the extent to which we feel valued and included as part of a family, a community, a team or a business. Inclusion is experienced when we believe that our uniqueness is valued by others while, at the same time, we have a sense of connectedness or belonging to a group.</p> <p>We believe an inclusive workplace is one in which all individuals are treated fairly, respectfully and feel empowered to contribute to the business’ success.</p>	<p>Diversity is a combination of the visible and invisible differences that can shape our view of the world, our perspectives and our approach in all aspects of our lives.</p> <p>Diversity is about what makes each of us unique and includes our origins, backgrounds, personalities, life experiences, beliefs and personal characteristics.</p>

Principles

Inclusion and diversity is about recognising and harnessing the value that individual differences bring to the organisation. As an inclusive employer, we celebrate our diverse workforce and the benefits that this brings in achieving our goals.

The key principles of our approach are to:
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- fully commit to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the Exeter.
- not discriminate because of including but not limited to, race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes,

religious or ethical values system, national origin, neurodiversity, political beliefs and any protected characteristics.

- encourage, promote and maintain an inclusive and supportive work environment, which reflects the rights of individuals to be treated fairly and with respect and enables them to fulfil their potential
- recruit, develop and retain talent based on skills, qualifications, experience, performance, behaviours and achievements, using clearly defined, fair and inclusive criteria
- invest in employee development, treat employees fairly and equally and encourage an honest and open culture, which values differences
- support employees to work in a way that suits their circumstances by supporting flexible working, offering part-time roles, encouraging job-sharing opportunities where this is possible and pragmatic from a business perspective
- develop policies and practices to direct and guide the way in which we conduct ourselves both within the organisation and with our external stakeholders, which make our principles and expectations clear, deliver fairness and consistency of approach, and value individuality
- understand our members and the communities in which we operate to deliver excellent service to our increasingly diverse member base
- ensure that all employees are aware of their rights and their responsibilities in relation to diversity and inclusion
- encourage leaders, employees and our external partners and stakeholders to make a positive difference through proactively supporting our diversity and inclusion principles

Responsibilities

What we expect from our employees:

It is the responsibility of all employees to promote a culture and approach to our business that supports our principles of inclusion and diversity. As an employee we would expect you to:

- understand and comply with the policy and report any incidents or alleged incidents that would be considered a breach to your line manager or HR
- promote our principles of inclusion and diversity, and speak up if you see or hear something that you believe is not in line with our expectations
- raise any potential issues of discrimination, victimisation, bullying or harassment. Any employee raising a concern in an attempt to resolve a matter as an alternative to a formal process will be supported.
- be aware that you can be held personally liable as well as, or instead of, the Society for any act of unlawful discrimination.

What we expect from management:

As a manager, the Society expects you to:

- ensure the policy is implemented, employees are trained against it and comply with it
- take responsibility by discussing and resolving any allegations you are made aware of against a colleague or a third party associated with Society with the complainant
- ensure further advice, support and training is requested from the HR team as required.

Unacceptable conduct, bullying and harassment

To promote and maintain an inclusive and diverse working environment that allows all employees to feel valued, it is important that we are all aware of behaviours that may constitute harassment, bullying or unacceptable conduct that may have a negative effect on an individual.

Unacceptable conduct

Conduct that is deemed unacceptable includes, but is not limited to:

- unwelcome physical contact, comments, looks, innuendos of either a personal or suggestive nature which cause offense
- any form of victimisation for any form or human difference including but not limited to, race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, religious or ethical values system, national origin, neurodiversity, political beliefs and any protected characteristic, whether the grounds are actual or assumed
- offensive language or behaviour including jokes and insults
- display of visually offensive material, including that of a sexual nature
- sexual advances, including favours from an individual in authority in relation to another individual's job content and career progression
- intimidating or humiliating behaviour

Bullying

The term 'bullying' is often associated with persecution or oppression by either force or threat, however, the majority of bullying within the workplace occurs at a much lower level, which can be described as continually or repeatedly troubling or annoying an individual.

The types of behaviour that may constitute bullying, and are unacceptable, irrespective of the circumstance, include, but are not limited to:

- constant, unwarranted criticism or ridicule, especially where this occurs in front of or in earshot of other employees, for example in a meeting
- insulting remarks or unfounded threats
- undermining an individual or group of employees through overloading them with too much work
- preventing an individual from having access to development or promotion opportunities

Harassment

The term 'harassment' constitutes unwanted conduct towards an individual that leads to:

- the violation of their dignity or
- the creation of an intimidating, hostile, degrading, humiliating or offensive environment.

Issues or complaints of unacceptable behaviour, bullying or harassment can be of a sensitive or personal nature. Regardless of whether unacceptable behaviours are intentional or unintentional, it is important to remain mindful that what doesn't cause offense to one person may do so to another.

Reporting unacceptable conduct

Employees who raise a genuine concern or complaint under this policy will not, under any circumstances, be subjected to any unfavourable treatment or victimisation as a result, whether they are raising a concern on their own behalf or for someone else.

However, if it is established that an employee has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action may be taken against that employee.

Our principles on unacceptable behaviour, bullying and harassment also extend to our third-party partners, for example members, customers, suppliers, visitors and other associates. Employees should report any unacceptable conduct, bullying or harassment by third-parties to their manager who will take appropriate action.

Measures

The Board is committed to building and implementing appropriate policies, programmes and initiatives designed to promote inclusion and diversity at all levels of the organisation and to ensure, where possible and amongst other things, that there is an internal pipeline of diverse talent within the organisation who are qualified and capable of taking up senior positions.

The Society aims to always:

- communicate our commitment to inclusion, diversity and equal opportunity ambitions to all our employees and ensure this policy is read and accepted by all employees
- ensure that external suppliers, workers and agents are made aware of our Policy and approach
- develop and maintain a working environment which is free of discrimination, bullying and harassment
- recruit the most capable individual for each job regardless of their background
- conducting inclusion and diversity awareness training for all management and supervisory roles which will be updated annually
- recognising that we have an important role as a responsible employer in creating a culture that supports our employees in the various stages of their working lives and as part of this process, reviewing our policies in areas such as recruitment, flexible working and maternity/paternity leave to ensure they align with our aspirations to create a truly inclusive and diverse business.
- ensure that a course of action exists so that any employee, who feels they have experienced unfair treatment at the hands of either the Society or a colleague, can readily have their concern addressed
- ensure that our employment policies and practices are compliant with current legislation

Monitoring and Reporting

The Exeter's Board will report annually against the objectives and other initiatives taking place within The Exeter to promote gender and other forms of diversity. It will also report annually on the outcome of the Board evaluation, the composition and structure of the Board as well as any issues and challenges the Board is facing when considering the diverse make-up of The Exeter.

A summary of this Policy, and of the progress made in achieving its objectives, will be disclosed in the Annual Report & Accounts.

Board Diversity

The Board commits to have a Board that is well-balanced and has the appropriate skills, knowledge, experience and diversity for the needs of the business. Diversity is considered in the broadest sense the range of human differences, including but not limited to race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, religious or ethical values system, national origin, neurodiversity, political beliefs and any protected characteristic.

It is The Exeter's policy to maintain and develop diversity of its Board without compromising on the calibre of new directors appointed and for it to operate within an inclusive environment where all Board members can fully contribute, be listened to and to do their personal best. It is

also recognised that there will always be an overriding need to ensure that The Exeter continues to meet its regulatory obligations as an organisation operating in the financial services industry.

The Board as a whole is responsible for inclusion and diversity, and delegates responsibility for the implementation of this Policy to the Chief Executive.

This Policy and its implementation will be reviewed on a regular basis to ensure that it remains appropriate and relevant to the organisation and the Society is committed to providing the necessary support in order to ensure that the business can fulfil the requirements outlined in this policy.

This Policy will be communicated to everyone working for or on behalf of The Exeter and will be made available on the Society's intranet and website.

Approved by the Board of The Exeter on 22 September 2021.

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