

Human rights and diversity policy

1. Policy

1.1 Human Rights

We are committed through all of our business activities to respect the integrity and fundamental Human Rights of our stakeholders. In particular we will:

- Maintain the explicit commitments set out in our [Statement of Business Principles](#)
- Be guided in the conduct of our business by the principles set out in the United Nations Universal Declaration of Human Rights
<http://www.un.org/en/documents/udhr/index.shtml#a1>
- Encourage our business partners and suppliers to observe the principles of the Universal Declaration of Human Rights, including those with overseas operations.

In the event that new operations are commenced or businesses acquired we will strive to apply the same, consistent standards of best practice.

1.2 Diversity

We are committed to providing a working environment in which everyone feels valued and respected and is able to pursue a rewarding career whilst contributing to the success of our business. We believe there are benefits in having a diverse workforce and aim to ensure that everyone can enjoy equal opportunities in an environment which is free from discrimination, harassment, bullying and victimisation.

This policy follows directly from our Corporate Values:

- Act with Integrity in all we do
- Value People treat them fairly.

2. Application

2.1 Scope

This policy applies to all employees (including fixed term and contracted staff) and stakeholders of Friends Life.

It is our aim to provide equal opportunities for all without discrimination on the grounds of:

- Race, ethnic origin, skin colour or nationality
- Religious or political beliefs and affiliations
- Sex, gender reassignment, or sexual orientation
- Marriage/civil partnership
- Age

- Disability
- Pregnancy or maternity
- Membership or non-membership of a trade union.

We aim to ensure that no-one in our business, or seeking employment with us, receives less favourable treatment on the above grounds or is disadvantaged by requirements or conditions which cannot be shown to be justifiable. In some countries in which we operate, local laws dictate that preference must be given to particular groups and this is a justifiable reason for discrimination. Access to employment, training and promotion is based solely on the objective assessment of ability and other relevant job related criteria. In the case of training and career development access will also be based on assessed need. In addition to this:

- We respect the dignity of individuals and their beliefs.
- We do not tolerate any racial, sexual, physical, mental harassment or bullying in the workplace, or at functions connected with the workplace.
- We accept anyone's right to join a trade union or staff association and we will consult and negotiate with any such body that is formally recognised.

2.2 Responsibilities

Everyone has a strict obligation to:

- Respect and act in accordance with this policy
- Treat fellow staff members with respect and dignity
- Ensure that their own behaviour does not cause offence or distress
- Report any incident or behaviour which contravenes this policy and not indirectly support unfair treatment by ignoring what is happening around them.

In addition, those who manage staff are responsible for:

- Ensuring that the policy is fairly and consistently applied in all areas under their control
- Eliminating and addressing any unfair practices of which they are aware, whether or not a complaint has been made
- Promoting an environment in which people feel comfortable in reporting incidents which are causing them concern
- Reacting quickly to complaints, investigating them objectively and thoroughly and taking any required action promptly
- Business units shall have in place policies that reflect local legal requirements and Group-wide good practice. Any behaviour which contravenes this policy will be viewed very seriously, will be investigated fully and may result in disciplinary action, including dismissal in appropriate cases.

2.3 Operational application

- We will apply the standards set out in this policy and will establish monitoring and other supporting processes to ensure the objectivity of employment related decisions. The main areas where these processes are established include: recruitment; career planning; promotion and transfer; training and personal development; performance management and redundancy.
- Those involved in decision making processes shall be trained to ensure decisions are taken based on objective criteria and can be justified.
- We will continue to engage with our stakeholders on issues of concern and importance and will act on these issues.

We will ensure that our employees understand and act on the objectives set out in this policy and other related policies including but not limited to:

- Disciplinary
- Dress Code
- Grievance
- Recruitment
- IS Security
- Flexible working
- Whistleblowing.

We will continue to engage with our stakeholders on issues of concern and importance and will act on these issues.

2.4 Breach of the policy

Any individual who disregards this policy may be subjected to the Company's disciplinary procedure, and, in serious cases, dismissal. Individual members of staff who have been involved in bullying or harassment may also be personally guilty of unlawful harassment and, in some cases, at risk of criminal prosecution.

2.5 Bringing a complaint

If you believe that you have been subjected to discrimination, you should first contact the HR helpdesk ([UK](#) or [International](#)) and, if an informal resolution is not achieved, you should invoke the Company's grievance procedure.

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