



## Inclusion and Diversity Policy

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# 1 About this document

## 1.1 Background

Flood Re is seeking to be an organisation that embraces diversity in its broadest sense, not just in terms of visible characteristics but also unseen differences, such as thinking style and personality types. The Company is committed to providing a fair, rewarding and enjoyable environment in which all employees understand and share the values and goals of the business. This policy reflects the requirements of UK employment law, such as the Equality Act 2010, and also sets out our standards, expectations and commitments regarding inclusion and diversity.

## 1.2 Purpose

The purpose of the policy is to outline how Flood Re will foster an inclusive environment whereby we can maximise everyone's contribution. We want to maintain an inclusive and diverse workforce by attracting and retaining people from the widest pool of talent and creating a culture where all employees are treated, and treat others, with dignity and respect, in an environment free from harassment, bullying and victimisation. This means this policy confers rights as well as responsibilities on everyone working at Flood Re.

## 1.3 Scope

All Flood Re Managers, employees and anyone working at Flood Re should follow the guidance in this document.

## 1.4 Audience

This policy is intended for internal use by Flood Re employees.

## 1.5 Governance

This document is owned by the HR Manager. It is reviewed by the HR Manager at least annually and approved by the Executive Committee. This helps ensure it remains appropriate and relevant. Additional reviews may be performed as required and as detailed in the Documentation Policy.

## 1.6 Related documents

Document reference	Document name
FR0239	Grievance Procedure
FR0240	Disciplinary Procedure
FR0002	Documentation Policy
FR0005	Documentation Index and Solvency II Requirements Mapping

Document reference	Document name
N/A	Diversity, Equity, and Inclusion, (DEI) Employee Resource Group (ERG) Terms of Business

## 2 Inclusion and Diversity

### 2.1 Board Diversity Policy

Flood Re's Board recognises the benefits of diversity in its broadest sense in the boardroom as well as in the wider business. A combination of different skills, experiences, backgrounds, and personal characteristics on the Board, and within the Executive Committee, will provide the wider perspectives, discussions, insights, and challenges needed to support good strategic decision making. Board recruitment practices ensure we have access to a diverse talent pool. New appointments to the Board are made on merit and take account of the specific skills and experience, independence and knowledge needed to ensure a rounded and diverse board composition.

The Board is committed to cultivating a diverse senior management team and increasing the pipeline of diverse talent within the wider organisation. Flood Re takes a progressive approach to promoting diversity throughout its organisation and actively considers diversity when attracting and securing talented individuals to help deliver our objectives.

As well as increasing diversity overall, the Board supports and oversees Flood Re's goal of increasing female representation on the Executive Committee. Through our Women in Finance Charter commitment, a gender diversity target is set and progress against this objective is monitored.

#### 2.1.1 Monitoring and reporting

Compliance with this policy will be assessed as part of Flood Re's annual Board and Committee Effectiveness Review and findings and recommendations will be reported to the Board. Flood Re will report annually, in the Annual Report, on the process it has used in relation to Board appointments with reference to this policy.

### 2.2 Flood Re's Inclusion and Diversity Principles

Our aim is to create an inclusive and diverse workplace that is free from discrimination and where we actively work to mitigate against and reduce bias so that we can better meet our goals and realise Flood Re's purpose. We want our employees to feel that their differences are respected and valued so they can genuinely be themselves at work.

We believe an inclusive workplace is an environment where everyone is treated with dignity, courtesy and respect, where talents, styles and skills of different groups and individuals are valued, and where productivity and collaboration are enabled by a cohesive workforce and a supportive and respectful culture.

We firmly believe everyone should be able to perform to the fullest of their abilities and nobody should be subjected to discrimination or objectified or placed at a disadvantage because of their sex, age, disability, gender reassignment, race, (colour, ethnic or national origin), religion or belief,

sexual orientation, marriage or civil partnership, pregnancy or maternity, or other factors such as education, neurodiversity or social background.

We do not tolerate harassment, bullying or victimisation on any grounds and we will take firm and appropriate action to deal with any such acts. Everyone at Flood Re can expect to be dealt with in an honest, transparent, supportive and lawful way. Furthermore, in the pursuit of equitable outcomes, we recognise that treating everyone the same can exacerbate or entrench existing inequities. We are therefore committed to treating people as unique individuals and in ways that are intended to create fair outcomes.

Our relationships with stakeholders and third parties provide an additional opportunity for us to promote and encourage greater inclusion and diversity in the Insurance Industry and beyond. We expect and encourage the same behaviours from third parties with whom we work and where necessary, will take action to address any circumstances that fall below our expectations.

### 2.3 Our Responsibility as an Organisation

We will encourage and promote inclusion and diversity outside of Flood Re by -

- Actively enquiring about the gender balance of panels and speakers at external events at which we are invited to speak;
- Working with recruitment agencies that have similar goals and working practices to our own; and
- Considering diversity and inclusion when selecting suppliers and including appropriate questions in formal tender processes.

### 2.4 Our Responsibilities as an Employer

We will engender and create an inclusive and diverse workplace by –

- Proactively taking steps to seek out and recruit from the widest talent pool available,
- Basing recruitment, selection and employment decisions on fair and objective criteria and reviewing procedures from time to time to ensure that they fully comply with developments in employment practice and legislation,
- Promoting a welcoming workplace culture, where everyone is treated with respect and dignity and everyone feels valued,
- Ensuring all employees understand Flood Re's desired behaviours and by displaying these in our daily interactions,
- Implementing appropriate policies and benefits concerning working conditions, flexible working and employee welfare & wellbeing and ensuring they evolve to meet the needs of both the business and Flood Re's people,
- Encouraging employees to develop and progress both within Flood Re and beyond, recognising and valuing their strengths, skills and experienced gained both in and outside of work,

- Creating opportunities for different groups to work together to harness diversity of thinking and maximise creativity,
- Training employees so they are equipped with the skills they need to develop, realise their potential and contribute effectively to the business,
- Providing specific training on equality and diversity to all employees to help us all recognise and eliminate discrimination in the workplace,
- Delivering fair and consistent assessment of performance, which is clearly linked to rewards, through the Performance, Development & Assessment framework,
- Evaluating roles fairly, taking into account their content, size and value to Flood Re, ensuring that remuneration is consistently benchmarked and based on a combination of individual competencies, personal performance and market comparisons for similar work,
- Delivering equal pay and benefits for those who carry out the same or similar work,
- Encouraging two-way open communication between managers and employees so that employees can raise issues in the knowledge that they will be listened to, treated with respect and receive a considered response,
- Providing a formal channel for employees to confidently raise complaints via the Company's Grievance Procedures, ensuring all complaints are thoroughly investigated and responded to in a timely manner,
- Seeking regular anonymised feedback from employees and responding and acting appropriately in response,
- Creating opportunities for employees to build relationships internally and externally through network, social events and opportunities to work in matrix teams,
- Making reasonable adjustments to work arrangements or physical aspects of the workplace to meet the needs of applicants or employees,
- Encouraging a healthy work-life balance for all employees,
- Taking into account the needs of different groups of employees for example on religious grounds, or those with care giving or parental responsibilities,
- Respecting the right of employees to undertake public duties, join a recognised trade union, employee associations or any other network of their choosing,
- Upholding a zero tolerance policy on bullying, harassment, victimisation or discrimination on any grounds, ensuring appropriate disciplinary action, including dismissal, is taken against anyone who disregards this, and
- Providing employees with access to a confidential advisory and counselling service through the Employee Assistance Programme.

## 2.5 Your Responsibilities as an Employee

All employees have a responsibility to behave in accordance with this policy and are expected to complete any mandatory training and development initiatives required of them.

All employees are required to treat colleagues in a professional, fair and non-discriminatory manner, respecting and embracing differences.

Employees in management and supervisory positions are responsible for identifying and eliminating any unfair practices of which they are aware. Where a manager identifies a problem in their area, they should raise the issue with HR for advice on how to deal with the matter.

Employees should inform their manager or HR if they believe that any form of bullying, discrimination, harassment, victimisation or intimidation, on any grounds, has taken place.

## 2.6 Bullying, Harassment, Sexual Harassment and Victimisation

If an employee feels they are being bullied, harassed or victimised in the workplace, they are strongly encouraged to raise such an incident as soon as it arises, and should refer to the Company's Grievance Procedures.

The Company is committed to treating any complains of this nature very seriously and the Company will not tolerate behaviour of this kind. Any complaints of harassment, bullying or victimisation raised by an employee will be investigated fully and, if appropriate, will be dealt with under the Company's disciplinary procedure.

### 2.6.1 What is Bullying

Bullying is any persistent behaviour, directed against an individual, which is intimidating, offensive or unwelcome and which undermines the confidence and self-esteem of the recipient. Bullying can be non-verbal, verbal or physical, and the following list provides some examples:

- Undermining status / credibility
- Non co-operation
- Isolating or ostracising someone
- Threats
- Derisory remarks
- Belittling someone's opinion
- Unjustified persistent criticism
- Physical intimidation
- Excessive supervision
- Physical, verbal or psychological threats

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions and supervision given to workers in the course of their employment, does not amount to bullying.

### 2.6.2 What is Harassment

Harassment can be a single incident or series of incidents of unwanted conduct relating to a protected characteristic that has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Protected characteristics are a person's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Incidences of harassment can occur in any number of forms and the following list provides some examples:

- Offensive gestures, e-mails, pin-ups or graffiti
- Racist, sexually explicit or offensive jokes
- Personal or inappropriate comments
- Unwanted propositions
- Groping / inappropriate or unwanted physical contact
- Threats
- Assault
- Banter, taunts or insults
- Excluding someone from a conversation or a social event or marginalising them from the group

### 2.6.3 What is Sexual Harassment

Sexual harassment is conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; or less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct. The following list provides some examples.

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (eg by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

#### 2.6.4 What is Victimisation

Flood Re is committed to providing a safe and supportive work environment. Victimisation, which involves treating someone unfairly because they have made or supported a complaint about discrimination or harassment, is strictly prohibited. Any form of retaliation against employees who raise concerns or participate in investigations will not be tolerated. We encourage all employees to report any incidents of victimisation, and we will take appropriate action to address and prevent such behaviour, ensuring a respectful and inclusive workplace for everyone.

2.7 Resources

Further information and support is available to all Flood Re employees through our insured benefit arrangements and also wider external resources –

<p>Employee Assistance Programme - Health Assured</p>	<p>Through the EAP Service:</p> <ul style="list-style-type: none"> <li>• Online portal - <a href="#">Home   Health Assured</a></li> <li>• Username: GIP Password: EAP</li> <li>• 24/7 they can be contacted on 0800 030 5182</li> </ul>
<p>Private Medical - BUPA</p>	<ul style="list-style-type: none"> <li>• BUPA Claim line – 03456 090111</li> <li>• Anytime Health line – Qualified nursing team available 24/7 to answer your health concerns 0345 605 0537</li> <li>• Download the Bupa Blua Health app to your smartphone from the App Store or Google Play and use unlimited video consultations 24/7*</li> </ul> <p><b>Even if you are not a member of BUPA you can still access their Wellness Hub <a href="https://www.bupa.co.uk/health-information/wellness-hub">https://www.bupa.co.uk/health-information/wellness-hub</a>, and rewards <a href="https://bupa-rewards.bupa.co.uk/welcome">https://bupa-rewards.bupa.co.uk/welcome</a> and register under the second option with Group PIN: INTE02</b></p>
<p>Health Cash Plan - Health shield</p>	<ul style="list-style-type: none"> <li>• Access all the services through the members area on the <a href="#">Workplace health provider supporting employee wellbeing   Health Shield</a></li> <li>• My Counselling: 24/7 Counselling and Support Helpline providing guidance and counselling on matters from family to finance.</li> <li>• My GP Anytime: Access to a GP over the phone 24/7, with the option for a video chat on weekdays and private prescriptions service</li> </ul>