

# Equity, Diversity & Inclusion Policy

June 2024

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**LSEG**

## Document Summary

Policy Summary	This Group policy sets out the approach to Diversity, Equity & Inclusion at LSEG		
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## Version Control

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## 1.0 Introduction and purpose

We are on a journey to become one of the world's leading organisations. To achieve that ambition, we need to be:

- A first-choice career destination for global talent;
- United and guided through our LSEG values and build a culture of high performance and belonging.

This policy sets out how we approach Equity, Diversity & Inclusion (EDI) at LSEG outlining our:

- Philosophy;
- Ambitions;
- Expectations with regards to building a culture of belonging free from discrimination, harassment, and bias.

### Our Equity, Diversity & Inclusion (EDI) philosophy

We aim to create a culture of belonging, a workplace that is truly representative of all sections of society and our customers, that is fair and inclusive for all, where diverse perspectives are valued and leveraged throughout the Group.

We have 4 ambitions that support our philosophy above:

1. Creating a culture of belonging for all;
2. Creating equity in our processes that enable the attraction, retention and fair promotion of a global diverse pipeline of talent;
3. Building a global leadership team that's diverse in makeup and experiences, and accountable for our progress;
4. Leading the Industry in progressing the EDI agenda.

At LSEG, we are committed to complying with applicable laws, rules and regulations governing non-discrimination wherever we do business. This means that where local legislative requirements do not meet our internal policies, we will always expect that this policy is followed at a minimum.

We are committed to providing equitable employment opportunities through positive action<sup>1</sup> with regard to hiring, compensation, promotion, classification, training, apprenticeship, referral for employment and other terms of employment for all persons. We are committed to encouraging equity<sup>2</sup>, diversity, and inclusion among our workforce, and eliminating unlawful discrimination.

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<sup>1</sup> Positive action refers to the mitigation or elimination of barriers to opportunity, particularly affecting underrepresented groups. For example, LSEG encourages the practice of sourcing talent through diverse networks to 'widen the gate' and increase diverse talent pools in recruitment.

<sup>2</sup> Equality assumes we are all equal. Equity, however, recognises that there is a need to 'level the playing field' to overcome historical disadvantages often experienced by minority groups. At LSEG, we encourage equitable treatment of colleagues through positive action.

We do not tolerate discrimination on the basis of:

- Age;
- Being pregnant or on maternity leave;
- Citizenship status;
- Disability;
- Gender identity or expression;
- Marital status;
- Race including colour, nationality, ethnic or national origin;
- Parental status
- Religion or belief;
- Sex;
- Sexual orientation;
- Trade union membership and activities;
- Veteran status.

In addition to the list of protected characteristics, certain countries have additional “protected characteristics” which will be protected in that country, as set out in local policies.

Ensuring that our people processes are fair and objective is critical for us at LSEG, and we encourage People Leaders to make adjustments and take positive action to achieve that aim.

We are committed to a programme of action to make this policy effective and bring it to the attention of all colleagues. The principle of non-discrimination and equitable access to opportunity applies to the treatment of visitors, agents, clients, investors, customers, suppliers and other business contacts by colleagues and former colleagues.

The following sections deal with the specific categories of colleagues and areas of work which we have identified as potentially giving rise to issues surrounding equitable access to opportunities. They also provide more specific guidance on the parameters of our policy and approach to Equity, Diversity & Inclusion.

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## 2.0 Scope and Application

This policy applies to all LSEG employees in all locations and to all subsidiaries and joint ventures in which the LSEG has a controlling interest. The policy itself does not apply to workers, self-employed contractors, consultants or other workers. However, whilst the policy applies to LSEG’s employees, we expect all members of LSEG’s extended workforce, including contractors, consultants, temporary workers, and agents performing services for, or on behalf of, the Group to follow this policy in connection with their work for LSEG.

Failure of a member of our extended workforce or other covered service provider to follow this policy can result in termination of their relationship with LSEG. If you are an agency worker, self-employed contractor or consultant and have any further questions, you should inform your People Leader and your agency.

If you are unsure about any part of this policy or how it might apply to you, speak to your People Leader or local People Function contact.

This policy is for your guidance only. It does not form part of your employment agreement and we may amend the policy from time to time.

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### **3.0 Responsibility for Implementation**

We all contribute to the culture of LSEG therefore each of us has a responsibility to uphold the standards and expectations set out in this policy.

If you are a People Leader, you have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those you manage adhere to this policy and promote our aims and objectives with regard to diversity and inclusion. To facilitate this process, all People Leaders are encouraged to explore LSEG's Diversity and Inclusion resources and our Inclusive Hiring platform. Please see Section 7 for further information.

We all have a responsibility to call out inappropriate behaviour or decisions that are in breach of this policy. People Leaders especially expected to call out behaviour or decisions that are in breach of this policy. It is People Leaders' responsibility to take action when others may not feel able to. Our People Leaders are also responsible for taking immediate action if they are made aware of or witness any breach of this policy and failure to do so could lead to disciplinary action.

As an LSEG colleague, you are responsible for the success of this policy and must ensure that you familiarise yourself with this policy and act in accordance with its aims and objectives. We encourage you to call out behaviour or decisions that are in breach of this policy and if you are made aware of a breach of this policy or witness a breach of this policy, it is your responsibility to raise this with your People Leader, or your local People Function contact. If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact your local People Function contact. We also encourage all colleagues to familiarise themselves with LSEG's Diversity and Inclusion resources for further information. Please see Section 7 for further information.

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## **4.0 Our commitment to you**

### **4.1 Recruitment and Selection**

Recruitment procedures are reviewed regularly to ensure that colleagues are treated on the basis of their relevant merits and abilities, and that a sufficiently diverse cross-section of the community is reached. We regularly review job selection criteria to ensure that they are justifiable on a non-discriminatory basis as being essential for the effective performance of the job.

We take steps to ensure that knowledge of vacancies reaches a wide labour market and, where relevant, any groups that are under-represented. Where appropriate, we may use lawful exemptions by applying positive action to recruit suitably qualified people in order to cater for the needs of particular groups. Vacancy advertisements will include an appropriate short statement on this policy.

To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified in Section 1, and to identify those sections of the local community which may be under-represented in employment, we monitor diversity characteristics (in accordance with legal and privacy requirements) including applicants' ethnicity, race, gender, and disability as part of the recruitment procedure. We also maintain records of this data solely for the purposes stated in this policy and in accordance with substantial public interest grounds under data protection law, for the purposes of identifying and keeping under review the existence or absence of equity of opportunity or treatment. On-going monitoring and regular analysis of the data provide the basis for taking appropriate positive steps to eliminate unlawful direct and indirect discrimination and implement this policy. You have a right to notify LSEG to stop processing your data for these purposes. That notice must specify a reasonable period for us to stop processing the data.

#### **4.2 Staff Training, Promotion and Conditions of Service**

Colleagues will not be discriminated against in their rights to access training and development opportunities, so they can progress within the organisation. All promotion decisions will be made on the basis of merit.

We regularly monitor the composition and movement of colleagues at every level. Ensuring equity in our people processes forms an essential foundation for our commitment to EDI. Within our EDI approach, we continue to build on and develop measures and monitoring methods to ensure equity across the talent life cycle at LSEG and we recognise what needs to be done to create a fair environment for all.

Our conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all colleagues who should have access to them and that there are no unlawful obstacles to accessing them.

#### **4.3 Termination of Employment**

We monitor redundancy criteria and procedures to ensure that they are fair and objective and do not directly or indirectly discriminate against colleagues.

We also ensure that disciplinary procedures are carried out fairly and uniformly for all colleagues, whether they result in the giving of disciplinary warnings, dismissal, or other disciplinary action.

#### 4.4 Fixed-Term Colleagues and Agency and Temporary Workers

We monitor our use of fixed-term colleagues, agency staff and other temporary workers and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion, and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

#### 4.5 Part-Time Workers

We monitor the conditions of service of part-time workers and their progression to ensure that they are being offered appropriate access to benefits, training, and promotion opportunities. We will also ensure requests to make changes to working arrangements are dealt with appropriately in line with our local policies.

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### 5.0 Breaches of this policy

If you believe that you may have been disadvantaged on the basis of any of the protected characteristics listed in Section 1, or any additional characteristic protected in your country, you are encouraged to raise the matter through your local Complaints or Grievance Policy and Procedure. If you believe that you may have been bullied or harassed because of any of the protected characteristics (or for any other reason), you are encouraged to raise the matter through our Anti-harassment and Bullying Policy. Colleagues who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under our local Disciplinary Policies and Procedures. Please find links to the other policies referred to above at the end of this policy.

If, after investigation, you are proven to have acted in breach of this policy (whether in relation to a colleague of LSEG or another person), you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We will always take a strict approach to serious breaches of this policy.

### 6.0 Review Cycle

There shall be yearly reviews of this policy.

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### 7.0 Additional Information

Please use our [Diversity & Inclusion resources](#) and [Inclusive Hiring platform](#) for further support.



## 7.1 Relevant group policies and guidelines

All people policies can be found on the [People Portal](#). You can also raise a [D&I Query](#) on our People Portal - a place for all your People related requests on demand.

Other relevant Group policies and guidelines include:

- [Anti-harassment and Bullying Policy](#);
- [Code of Conduct](#);
- [Confidentiality Policy](#);
- [Supplier Code of Conduct](#);
- [Privacy and Data Protection Policy](#).

These should be read in conjunction with this policy.

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