

Dignity at Work Policy

Phoenix Group is committed to creating a work environment free of discrimination where everyone is treated with dignity and respect. We value the individuality, diversity and creativity that every employee brings to the workplace and to the success of our business. This policy sets out what we commit to and what we expect of our employees to ensure we maintain that culture and provides clear guidance to help manage discriminatory complaints fairly, effectively, and as quickly as possible.

OUR COMMITMENTS

Principles	
1.	We're committed to treating our existing colleagues and prospective hires equally, and to providing them all with equal opportunities.
2.	We're committed to ensuring that everyone is treated with dignity and respect.
3.	We're committed to providing a safe, fair and equitable working environment where no one is discriminated against.
4.	We take a zero-tolerance approach to any form of unlawful discrimination, harassment or bullying
5.	We will fully investigate any claims of discrimination or unfair treatment, including where it relates to categories beyond the list of 'protected characteristics' (set out below).
6.	We support all colleagues in preventing and reporting any cases of discrimination or unfair treatment.

WHO DOES THIS POLICY APPLY TO?

This policy applies to our employees, agency workers and self-employed contractors in the UK. Colleagues working in other territories will have a local policy. It also applies to bullying or harassment by third parties such as customers, suppliers or visitors to our premises or actions by any of those individuals at an event outside of the workplace, which is linked to our business.

WHAT IS DISCRIMINATION?

You must not unlawfully discriminate against or harass other people because of a Protected Characteristic, including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

When we refer in this policy to "**Protected Characteristics**" we mean age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

We believe that everyone should be treated with dignity and respect. If you feel you have been discriminated against at work on grounds that are not included in the list of Protected Characteristics, you can raise your concerns. Please see the 'Contacts' section at the end of this policy. For example, this could be because of your gender identity, or socio-economic or family background or caring responsibilities.

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example:
 - Rejecting a job applicant because of their religious views.
 - Not promoting someone because of their acquired gender.
 - Excluding someone from a work event because their child is gay.

- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example:
 - Requiring a job to be done full-time rather than part-time would adversely affect women because they statistically have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
 - Requiring a specific dress code or banning certain types of dress may adversely affect those with religious beliefs or particular racial or ethnic groups who wish to dress in a particular way due to their religion, race or ethnicity. As above, such a requirement could be discriminatory unless it can be justified.

- **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It doesn't have to be a continuing behaviour and may be a one-off act. The fact that someone has put up with behaviour, or joined in with it previously, does not stop it from being unwanted. For example:
 - On a work night out, a male manager attempts to kiss a female in his team, who refuses. As a result, the manager makes her working life difficult by continually criticising her, interrupting her discussions with colleagues as "girlie chat" and telling others in the team that she is a prude.
 - Members of a team refer to an Indian colleague as going to be "married off" when she is on annual leave.
 - Members of a team continue to refer to and address a non-binary trans colleague as "sir" and "he" and refuse to use their correct pronouns, despite the trans colleague having asked that they be referred to as "they" on a few occasions.

- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. For example:

- A colleague brings a claim for age discrimination. Their team manager refuses various annual leave requests for time-off to seek legal assistance on their claim, despite allowing others in the team to take annual leave for other reasons.
- A colleague has interviewed for promotion and has been informally told that they have been successful. While waiting on confirmation of their promotion and new contract, the individual makes a complaint that other members of their team have been harassing a team member about their disabled son. The colleague is then emailed by the team manager to say they are not being promoted and no explanation is given.
- **Disability discrimination:** this includes all of the above discrimination but also any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability. For example:
 - A colleague has albinism. They request additional computer equipment to enable them to do their job effectively and their request is unreasonably denied. This is a failure to make a reasonable adjustment to meet the requirements the individual has as a result of their disability, and which would alleviate the disadvantage they face as a result of their disability.
 - A colleague is placed at risk of redundancy. While the process is ongoing, they are diagnosed with cancer. After their diagnosis, they apply for an alternative role but are denied the role due to not meeting the competency level required at interview. No one else applies for the role. Medical evidence suggested that their impaired performance at interview was a direct result of their cancer diagnosis and the medication required to be taken because of it. This is discrimination arising from the colleague's disability.
- **Bullying:** Bullying and harassment are often used interchangeably. However bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
 - Physical or psychological threats.
 - Overbearing and intimidating levels of supervision.
 - Inappropriate derogatory remarks about someone's performance.
 - Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

Any of the above behaviours can have serious effects on the victim's health and work. Many people feel obliged to "laugh it off" or pretend they do not mind for fear of being thought a troublemaker or being accused of having no sense of

humour. We recognise the serious effects which the above can have on the working lives of employees and will take all complaints seriously, committing to undertake a full investigation into any allegations of discrimination. Discriminatory treatment can result in legal proceedings, for which individuals may be held personally liable – not just Phoenix.

RECRUITMENT & SELECTION

We aim to ensure that no job applicant suffers discrimination because of any Protected Characteristic and that such applications are always reviewed on the individual's relevant merits and abilities. Job advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. They should include an appropriate short policy statement on equal opportunities. Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions, for example:

- questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any workplace/reasonable adjustments);
- questions to establish if an applicant is fit to attend an assessment or any workplace/reasonable adjustments that may be needed at interview or assessment;
- positive action to recruit disabled persons; or
- equal opportunities monitoring (which will not form part of the decision making process).

Applicants should not be asked questions relating to any Protected Characteristic. We are required by law to ensure that all successful candidates are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective colleagues, regardless of nationality, must be able to produce original documentation (such as a passport) before commencing employment with us, to satisfy current immigration legislation.

BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy and have zero tolerance for any form of unlawful discrimination. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

We encourage the reporting of any concerns. Colleagues can get support from their manager and from the Phoenix staff representation body, the Phoenix Colleague Representation Forum. Depending on the seriousness of the concerns, we offer colleagues both informal resolution options, such as voluntary facilitated conversations, and the ability to raise the matter formally through our grievance procedure which can be found in our Grievance Policy available on the intranet. Complaints will be treated in confidence and investigated. In very serious cases, a criminal offence may have been committed and you may wish to report matters to the police and we may be able to support you with this where appropriate. More information about how we deal with concerns and what happens after a concern is raised is in our Grievance Policy which is an internal policy for colleagues.

Colleagues, external stakeholders and third parties can also raise concerns with us through our Speak Up Office by emailing speakup@thephoenixgroup.com or by contacting Safecall who are an independent body who provide a fully

confidential reporting service. Concerns can either be raised via their hotline or online web form and contact details are in the Appendix below. Safecall never reveal your details to Phoenix without your explicit consent.

Stakeholders can also raise concerns with our relevant regulators. More information about this is, and the relevant contact details, is in the Appendix below.

Phoenix does not tolerate retaliation against those who raise concerns regarding our operations, activities and business relationships and take all reasonable steps to ensure that no whistle-blower suffers detrimental treatment because of raising a concern.

WHAT CAN I DO TO HELP?

We all have a responsibility to help create and maintain a work environment free of discrimination or bullying. You can help to do this by:

- being aware of how your own behaviour may affect others and changing it, if necessary. Remember that you can still cause offence even if you are 'only joking';
- treating your colleagues with dignity and respect;
- speaking up or taking a stand if you think inappropriate jokes or comments are being made;
- making it clear to others when you find their behaviour unacceptable, even if you believe it should be obvious in advance that this would be the case;
- intervening, if possible and appropriate, to stop discrimination or bullying;
- reporting any incidents to your manager or the HR Function and supporting us in the investigation of complaints; and
- completing any related mandatory training modules on discrimination and harassment in the workplace.

In addition, managers have a particular responsibility to:

- set a good example by their own behaviour;
- ensure that there is a supportive working environment;
- make sure that employees know what standards of behaviour are expected of them;
- intervene to stop discrimination or bullying; and
- report promptly to HR any complaints, or any incidents witnessed by them.

REVIEWING OF THIS POLICY

This policy is owned by Human Resources and will be reviewed at least annually.

APPENDIX – CONTACTS

<p>Protect</p>	<p>Protect is a whistleblowing charity and the leading authority in the field. Protect offers free and confidential advice to everyone; they are independent from Phoenix and will never pass on your details or concerns to us without your explicit consent. Further information can be found on Protect's website: www.protect-advice.org.uk</p>
<p>Safecall</p>	<p>Safecall provide a confidential speak-up helpline where individuals can raise concerns directly with them either via phone: UK: 0800 915 1571 Ireland: 1800 812 740 For all other jurisdictions, please check Safecall's website</p> <p>Or online web form available on Safecall's website. https://www.safecall.co.uk/file-a-report</p> <p>Safecall will never reveal your details to Phoenix without your explicit consent.</p>
<p>Our Regulators</p>	<p>Phoenix is regulated by the FCA, PRA, CBI and BaFin; you may report a concern directly any of them as Phoenix's prescribed persons. In Ireland you may also report to the Protected Disclosure Commissioner.</p> <p>You can also contact them for advice if you are unsure how best to proceed with any concerns you may have. To report a concern to a regulator, you do not have to report your concerns to Phoenix first. Concerns can be reported to the regulator(s) before, at the same time as, or after, being reported internally to Phoenix.</p> <p>You should however be aware that there may be impacts to the legal protection offered to you as a result of external disclosures and we would encourage you to discuss this confidentially with Protect or other legal counsel before raising your concerns.</p> <p>FCA Whistleblowing Service Helpline: 0207 066 9200 Email: whistle@fca.org.uk</p> <p>FCA website: https://www.fca.org.uk/firms/whistleblowing</p> <p>PRA Whistleblowing Service Helpline: 0203 461 8703 Email: PRAwhistleblowing@bankofengland.co.uk</p> <p>PRA Website https://www.bankofengland.co.uk/whistleblowing</p> <p>CBI Whistleblowing Service Helpline: 1890 130014 Email: confidential@centralbank.ie</p> <p>CBI Website:</p>

<https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing>

Protected Disclosures Commissioner (Ireland)

Helpline: 01 639 5650 Email: disclosures@opdc.ie

Protected Disclosures Commissioner (Ireland) website:

<https://www.opdc.ie/>

BaFin Whistleblowing Service:

Online reporting portal:

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BaF6&c=-1&language=eng>

BaFin Website:

https://www.bafin.de/EN/Homepage/homepage_node.html