Equity, Diversity & Inclusion Policy

May 2025



Document Summary

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1.0 Introduction and purpose

Our Equity, Diversity & Inclusion (EDI) philosophy

Our ambition at LSEG is to be one of the world's great companies, underpinned by an inclusive, high-performing culture.

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

Our Equity, Diversity and Inclusion (EDI) strategy and goals were set in alignment with our business ambitions and strategic objectives. Our EDI strategic ambition can be distilled into four key aspects:

- 1. Create a culture of belonging for all.
- 2. Build a global and diverse leadership team that is held accountable for creating an inclusive culture.
- 3. Create merit-based processes, enabling attraction, retention and promotion of a global, diverse pipeline of talent.
- 4. Lead the industry in promoting equality of opportunity for all.

At LSEG, we comply with applicable laws, rules and regulations governing non-discrimination wherever we do business. 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 with regards to hiring, compensation, promotion, classification, training, apprenticeship, referral for employment and other terms of employment for all persons. We are committed to eliminating unlawful discrimination.

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 jurisdictions have additional "protected characteristics" which will be protected in that location, as set out in local policies.

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

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 access to opportunities. They also provide more specific guidance on the parameters of our policy and approach to Equity, Diversity & Inclusion.

2.0 Scope and Application

While this policy applies to LSEG's employees, we expect all members of LSEG's extended workforce, including external workers, temporary workers and agents performing services for, or on behalf of, the Group (such as our business partners) to follow the expectations set out in 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 unsure about any part of this policy or how it might apply to you, then you should seek guidance from your People Leader or by raising a request via the Support Hub.

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.

3.0 Responsibility for Implementation

We all contribute to the culture of LSEG. Therefore, every colleague has a responsibility to uphold the standards and expectations set out in this policy.

People Leaders have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they 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 8 for further information.

All colleagues have a responsibility to report inappropriate behaviour or decisions that are in breach of this policy. People Leaders especially are expected to report behaviour or decisions that are in breach of this policy. People Leaders and colleagues are 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.

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 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, including, where relevant, any groups that are under-represented.

To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified in Section 1, 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 applicable laws. Our colleagues have a right to notify LSEG to stop processing their 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 our colleagues at every level. Ensuring equity in our people processes forms an essential foundation for our commitment to EDI. Within our approach, we continue to build on and develop measures and monitoring methods to ensure equity across the talent process life cycle at LSEG and we recognise what needs to be done to create a fair environment for achievement 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.

5.0 Breaches of this policy

If any of our colleagues believe that they may have been disadvantaged on the basis of any of the protected characteristics listed in Section 1, or any additional characteristic protected in their work location, they are encouraged to raise the matter through their local Complaints or Grievance Policy and Procedure. If they believe that they may have been bullied or harassed because of any of the protected characteristics (or for any other reason), they are encouraged to raise the matter through our Anti-harassment and Bullying Policy. Colleagues who make such allegations in good faith will not be 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, any of our colleagues are proven to have acted in breach of this policy (whether in relation to a colleague of LSEG or another person), they 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 Mental health and wellbeing

If any of our colleagues are struggling with their mental health at any point, we encourage them to open up to their People Leader wherever possible so that they can discuss with them what support is available and how they access this. If their People Leader has any concerns about their health and wellbeing, further medical advice may be sought. **Mental Health Champions -** Colleagues experiencing mental health challenges can speak in confidence to an employee who has undergone training to provide friendly, non-judgemental listening and support.

Mental health champions are not trained counsellors however they are available to offer a supportive listening ear and chat about how our colleagues are feeling and any issues our colleagues may be experiencing. They offer confidential and informal 1 to 1 support to anyone who needs a supportive voice.

Employee Assistance Programme – Our colleagues have access to an employee assistance helpline which is an anonymous, free, 24/7 service with dedicated counselling, practical information, live and digital content and wellbeing resources to support emotional, physical, financial and social wellbeing. Local phone numbers are available on the EAP website for our colleagues to access, please see the link at the end of this policy for more information.

The EAP service is completely confidential and provides assistance to colleagues and their household members on a wide range of issues where support, both practical and emotional, may be required.

7.0 Review Cycle

There shall be yearly reviews of this policy.

8.0 Additional Information

Please use our Diversity & Inclusion resources and Inclusive Hiring platform further support.

8.1 Relevant group policies and guidelines

All people policies can be found on the <u>People Portal</u>. Colleagues can also raise a <u>EDI Query</u> on our People Portal - a place for all 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.
- Speak up

Wellbeing

These should be read in conjunction with this policy.