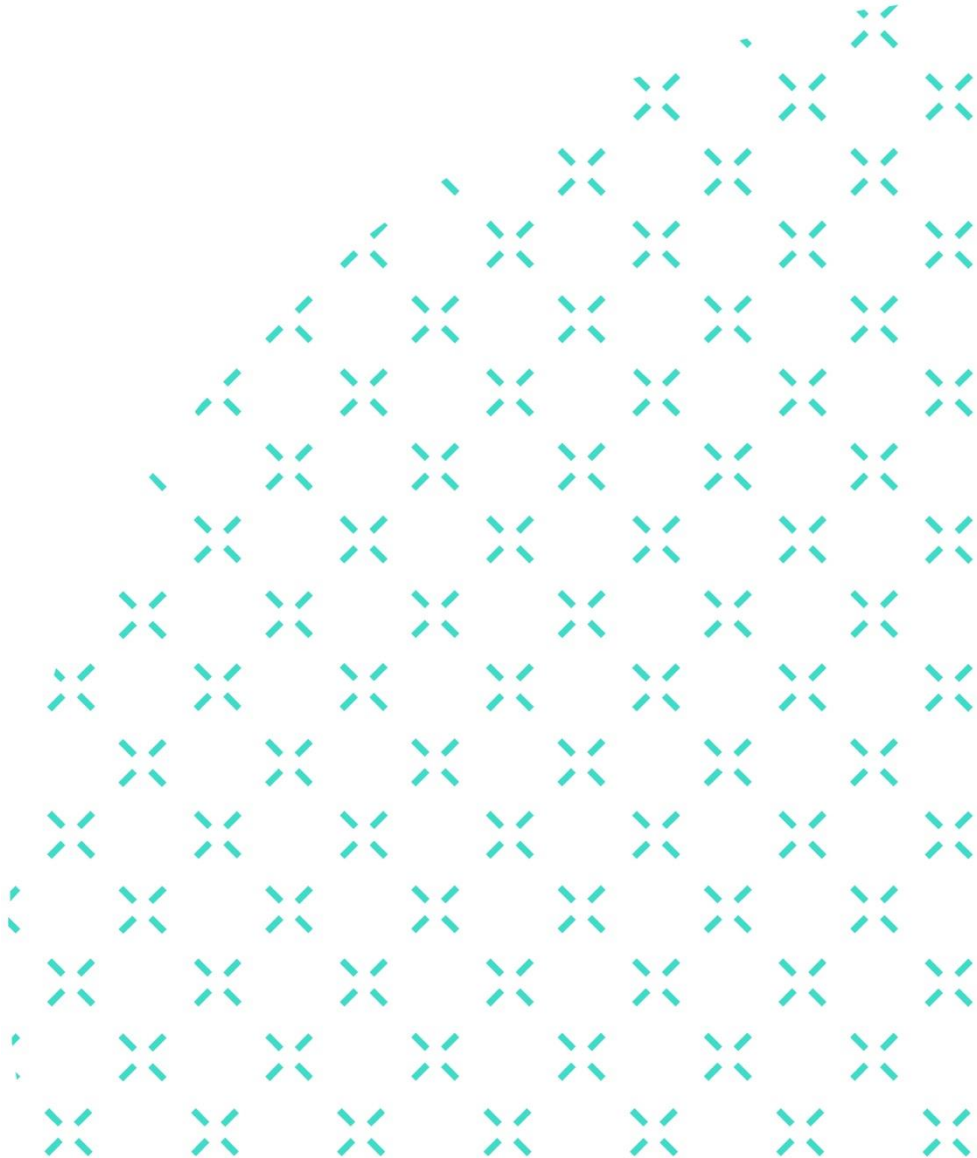


# **Inclusion and Diversity Policy**



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## Notes on the Policy Review Date

Our Inclusion & Diversity Policy will be reviewed and updated as necessary to reflect legislative changes and to take account of changes to our wider policies and procedures. A review of this policy will take place at least annually.

## Introduction

### Objectives and rationale for the policy

This policy outlines St. James's Place's (SJP) commitment to Inclusion & Diversity and is grounded in our pledge to respect and support internationally recognised human rights standards, as detailed in our Human Rights Policy.

Our vision is to create an organization where diversity is recognised as a strength, fostering an inclusive environment that enables everyone to thrive. This commitment extends from how we attract, retain, and develop talent to meeting the unique financial planning needs of our clients. We recognise that talent is not determined by race, ethnicity, gender, gender expression, gender identity, disability, neurodiversity, sexual orientation, age, religion, or socio-economic background.

As a leading financial advice business our success relies on delivering positive outcomes for clients through meaningful and long-lasting relationships with all our stakeholders. We believe that being the best place to have a career depends on creating a truly diverse and inclusive environment where broad perspectives are embraced, and everyone feels empowered to express themselves.

At SJP, we embrace diversity not only because it is the right choice but because it strengthens our organisation. Diversity enhances decision-making, risk management, innovation, and creativity, ultimately allowing us to provide the best products, services, and experiences for our clients and drive business growth.

Our employee-led networks are key to encouraging collaboration and inclusion by providing support and knowledge-sharing. These include:

- **Unity** (Gender)
- **SJPride** (LGBTQ+)
- **Connect** (Disability and neurodiversity)
- **EMBRACE** (Race and ethnicity)
- Carers' Network

Our Objectives are to:

- Attract a wide range of talented people, with broad perspectives, diverse backgrounds and different characteristics.
- Create an inclusive environment and engaged workforce which is led by a leadership team who demonstrate inclusive behaviours instinctively.
- Strengthen our talent pipeline by identifying, developing, and nurturing talent, and breaking down barriers to career progression.
- Deliver positive outcomes for clients through establishing meaningful and long-lasting relationships with all our stakeholders and providing invaluable advice for their diverse needs.

In executing our strategy, we will consider diversity in its widest sense, including, but not limited to, gender equality, gender expression, gender identity, sexual orientation, disability, neurodiversity, race and ethnicity, age, religion and faith or socio-economic background.

## **Policy Statement**

We value differences and recognise that cultivating an inclusive culture helps us to benefit from those differences, leading to achieve positive outcomes for clients. Attracting, retaining and developing a diverse workforce is central to our approach. Inclusion and diversity are vital to the future success of our business.

A diverse community of people from a wide variety of backgrounds, and with a range of experiences, skills and approaches, will help us better understand, support and meet the needs of clients. This is why creating an inclusive workplace and improving diversity around our Board table, across the employee base and the Partnership is a strategic priority for us.

Inclusion and Diversity is embedded throughout our learning and development offering, including our on-boarding, early careers, mentoring and leadership programmes. Related training has been designed to provoke thought on how we interact with each other, our day-to-day behaviours, and the impact we have on others. It highlights the purposeful actions we can all take to create an environment of equal opportunity where everyone can thrive.

To embed inclusive working practices in everything we do, we've created a framework of core I&D principles that can be applied to decision making, projects or processes to ensure we remain representative, accessible, inclusive and avoid bias.

We have made public commitments to increase senior female representation and minority ethnic representation across our business as well as in senior roles. Progress

against our public commitments is reviewed regularly and actions to accelerate progress are agreed through a robust governance process.

SJP suppliers must confirm their compliance with all applicable legislation regarding diversity and inclusion. This includes, but is not limited to, regulations related to maternity and paternity, equal opportunities, and modern slavery and human trafficking.

It is the responsibility of the entire group including the Plc Board, Group Executive Committee, and employees to uphold the policy and act within its standards and principles.

This policy can be found on our corporate website.

## **Related Documents**

- [SJP plc Board I&D Policy](#)
- [Human Rights Policy](#)

## **Glossary**

### **Definitions**

N/A

### **Acronyms**

Inclusion and Diversity (I&D)

Lesbian, gay, bisexual, transgender, plus any other underrepresented sexual orientation or gender identity groups (LGBTQ+)

### **Exceptions to the policy**

This policy applies to our UK and Irish entities and is fully endorsed by the SJP Plc Board and the Executive Committee. For avoidance of doubt this policy does not apply to SJP Partners.

SJP's Asian and Middle East entities adhere to their own inclusion and diversity charters which reflect the specific needs for their communities.

### **Compliance with the policy**

Non-compliance with the policy could result in disciplinary action, or, in the case of discrimination, legal action.

## **Governance & Ownership**

The accountability of our Executive Committee is evidenced through objectives which include measures on equality and diversity. Our progress is tracked regularly through our Responsible Business Advisory Group, and we report regularly to our Executive Committee, Plc Board and Nomination Committee.

Our Responsible Business Advisory Group leads and drives our strategy with support from the Inclusion and Diversity Working Group and our Community Networks. The Advisory Group provides valuable input to decision making, ensuring we apply a broad perspective.

## **Due Diligence**

Our Inclusion & Diversity Policy will be reviewed and updated as necessary to reflect legislative changes or to take account of changes to our wider policies and procedures. A review of this policy will take place at least annually.

## **Escalation Process**

If an employee or SJP Group Company has any questions or concerns to raise in relation to this policy, please contact the Responsible Business team at [Responsible.Business@sjp.co.uk](mailto:Responsible.Business@sjp.co.uk). Concerns about illegal or improper behaviour in relation to inclusion and diversity can also be raised through line managers, HR Business Partners or our Speak Up process.

## **Internal Audit**

Internal Audit will review the implementation of this Policy when carrying out relevant audits.

## Document Control

### Revision History

Version	Last Updated	By	Description
1	4 Dec 2019	Inclusion and Diversity Team	Initial policy draft
2	24 Nov 2022	Responsible Business Team	Annual update
3	14 Nov 2023	Responsible Business Team	Annual update
5	12 Nov 2024	Responsible Business Team	Annual update

### Review / Distribution

Version	Date	Distribution	Feedback Noted
2	7 Nov 2022	I&D Steering Group	
3	31 Oct 2023	Responsible Business Advisory Group	
5	9 Oct 2024	I&D Steering Group	

### Sign-off / Approval

Version	Date	Distribution	Approval
1	4 Dec 2019	SJP plc Board	Yes
2	16 Nov 2022	Nomination Committee	Yes
2	24 Nov 2022	SJP plc Board	Yes
3	14 Nov 2023	Nomination Committee	Yes
4	23 Nov 2023	SJP plc Board	Yes
5	12 Nov 2024	Nomination Committee	Yes
5	22 Nov 2024	SJP plc Board	Yes

### Next Review Date

Version	Review Date	Approval Body
3	26 Sept 2023	Responsible Business Advisory Group
3	14 Nov 2023	Nomination Committee
3	23 Nov 2023	SJP plc Board
4	21 Nov 2024	SJP plc Board
5	12 Nov 2024	Nomination Committee
6	11 Nov 2025	Nomination Committee
6	5 Dec 2025	SJP plc Board

## Appendices

N/A