Equality, Diversity & Dignity Policy
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1 Purpose of this policy

Through this policy document we commit to be an equal opportunity employer, by eliminating discrimination and encouraging diversity. Our aim is for our people to be truly representative of all sections of the wider community and for each one of us to feel respected and able to give of our best.

The Human Resources team will ensure we accomplish such commitment by being responsible for the interpretation of this policy. Moreover, the functional leaders, site leads, line managers and the HR Team are responsible for ensuring the policy is properly administered locally.

If you have any questions on this policy or require further support please contact local HR.
2 Scope

This policy applies to all employees of Alight | NGA HR, irrespective of their status and should also be adhered to by everyone who works in our organisation or is in a contractual agreement with Alight | NGA HR including contractors, agency workers, and visitors.

It applies to all aspects of the employee lifecycle, including (but not limited to): Selection; Recruitment; Training; Promotion; Transfers; Pay and benefits; Terms and conditions of employment; Performance reviews; Termination; and all other aspects of the employment relationship.

Employees are also expected to adhere to the policy at any other work-related setting such as during business travel, at external meetings, on clients’ sites, or at work-related social events.

Alight | NGA HR takes its commitment to equality, diversity and dignity at work seriously and has a zero tolerance approach to any form of discrimination. Employees need to be aware that failure to comply with the guidance outlined in this policy is likely to result in disciplinary action, which could include dismissal.

This policy covers Alight | NGA HR’s approach regarding diversity, equality, and dignity. This applies to all employees in Alight | NGA HR, irrespective of which country the employee is based. There are different legislations across individual countries, so for specific legal information relating to your country, please refer to local policies.

Where the characteristics are legally protected in a country, it is not only against Alight | NGA HR’s policy to discriminate against them, it is also unlawful. Legislation and policies are in place to protect employees as well as potential employees.
3  Our policy

It is Alight | NGA HR’s policy to create and maintain a supportive working environment in which all employees are treated with dignity and respect and where each employee can contribute their skills to the best of their ability.

People must be treated equally, regardless of their circumstances, irrespective of: Gender; Age; Religion or religious beliefs; Race; Sex; Disability; Gender reassignment; Marriage or civil partnership; Pregnancy and maternity; Sexual orientation; and any other characteristic where less favorable treatment is prohibited by applicable law. This list is not exhaustive.

Alight | NGA HR refers to these areas as ‘protected characteristics’. In addition to protected characteristics, Alight | NGA HR will not tolerate any other form of targeting of an individual based on any specific characteristic.

While promoting diversity makes good sense, it is also legally binding in most countries. Rather than focusing on the detail of legislation in all countries in which Alight | NGA HR is present, this policy covers all the main areas of impact that are common to most countries.

3.1 Discrimination, Victimization, Harassment and Bullying

This policy prohibits any behavior inconsistent with treating others with dignity and respect, in particular discrimination, victimization, harassment and bullying.

Discrimination, against the ‘protected characteristics’ includes (but is not limited to): Direct discrimination, involving treating a person less favorably than another on the grounds of the protected characteristics; Indirect or disparate discrimination, involving discrimination that may also occur when a rule or condition is applied that unjustifiably excludes or disadvantages a person or a group. An example of this would include requiring candidates for director level promotions to have had 20 years of experience. This may have a disproportionately adverse effect on woman who have taken career breaks to have a family.

People should also not be discriminated against where they are perceived to have, or are associated with, someone who is a ‘protected characteristic’. For example, someone who is friends with someone with a different religious belief.

Victimization: An individual will be considered discriminated against if they are treated less favorably because they have made a complaint of discrimination, brought to a legal claim or has assisted someone else in raising such a complaint (for example acted as a witness).

Harassment: This is ‘unwanted conduct which has the purpose or effect (regardless of the harasser’s intention) of violating a person’s dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment for them’. Harassment may be persistent or it may result from an isolated incident. It may be directed towards one individual or a group of individuals.

The key point about harassment is that it is behavior which is unwelcome from the point of view of the recipient. This means that it is the impact on the recipient which will determine whether the behavior amount to harassment, not the intent of the alleged harasser. Behavior may amount to harassment if it is unacceptable to one employee, even if other employees do not object.

Bullying: This conduct stands for offensive, intimidating, malicious, insulting or humiliating behavior, or abuse of power or authority, which attempts to undermine an individual or group of individuals and which may cause them to suffer stress. Bullying can take many forms, may be carried out in a concealed way, and may involve a course of conduct over some time.

An example of bullying would be deliberately humiliating an employee in front of other employees.
3.2 Rights of Individual Employees

Every employee of Alight | NGA HR has the right to work in an environment free from any form of discrimination, victimization, harassment and bullying. This includes protection from work colleagues, clients and customers. NGA HR recognizes fully the right of employees to complain should it occur, and all complaints will be dealt with seriously and confidentiality.

Employees have the right to complain through formal or informal procedures, set out in local policies. Every effort will be made to ensure that employees making complaints of discrimination, victimization, harassment and bullying and others who give evidence or information in connection with a complaint, will not be victimized. Any complaint of victimization will be dealt with seriously and confidentiality.
4 Responsibilities of all employees

It is the responsibility of everyone who works at Alight | NGA HR to help create a working environment free from discrimination, victimization, harassment, and bullying.

Employees should be aware that if they commit any act of discrimination (against the ‘protected characteristics’), victimization, harassment or bullying, this is likely to result in disciplinary action up to and including dismissal. In addition, employees who participate in such behavior may also face both civil and criminal liability.
5 Additional responsibilities of managers

Managers are responsible for fulfilling the company’s aim to provide a supportive working environment for all. Managers must therefore ensure that their work environments are free from unlawful discrimination, harassment and bullying of any kind.

If a manager is in any doubt about how they should handle a potential issue that may involve discrimination, victimization, harassment or bullying, they should contact HR at the earliest opportunity.
6 How to raise a complaint

Alight | NGA HR recognizes that employees may be uncomfortable about raising their concerns and, in particular, about being drawn into a formal procedure and therefore Alight | NGA HR seeks to ensure that employees are full supported when there wish to raise such issue. Alight | NGA HR has in place a Whistleblowing policy to handle matters on a confidential basis.

Local offices can have their own policies regarding raising a complaint, however in most cases the first step is for the employee to raise the complaint with their line manager. In situations where the line manager is the person the complaint is being raised about or connected to the complaint and therefore not appropriate, the complaint should be raised with their manager’s manager or Human Resources. There are multiple other ways in which an employee can seek support:

If you need support on any of the above behaviors or anything similar, there are multiple avenues for you to seek support (both anonymous and not), depending on your individual preference. You may choose to discuss something, report something (including about an issue not directly impacting you) or seek support in any or all of the following ways:

- Your manager
- Any member of the HR function
- A member of Alight | NGA HR Leadership team including Anita Lettink or Luca Saracino, the executive sponsors of Diversity within Alight | NGA HR
- You may wish to inform Andy Monshaw, CFO by emailing or using the askandy tool on our intranet
- For reporting something anonymously or confidentially you can contact our Whistleblowing hotline on +44 (0)1442 272 233 or email at whistle.blowing@ngahr.com

As far as possible, complaints should be raised as soon as possible following an act of alleged harassment, bullying and/or unlawful discrimination so that the matter can be fully investigated and dealt with in an appropriate manner.

6.1 False and Malicious Accusations

Our priority is to ensure that those who suffer from discrimination, victimization, harassment or bullying are able to obtain support and guidance in resolving their issue. Employees who raise complaints will be protected from work-related retaliation by the company, provided that complaints are made in good faith. If, however, there is evidence that a complaint has been raised on grounds that the person making the complaint knows to be false, or raises a complaint maliciously, the individual making such complaint (and anyone assisting this person) will be subject to disciplinary action, which may lead to dismissal.
7 Monitoring and learning

The company regularly carries out a monitoring process to measure the diversity of our workforce and to make sure that the diversity policy is being respected.

Training and awareness is provided through Alight | NGA HR’s e-learning system, SuccessFactors for all new joiners, and on an annual basis for all employees as part of Annual Compliance Training as well as other learning modules.
8 Data protection

Alight | NGA HR takes data protection seriously and it complies with the legislation in place to protect your personal data. This policy is to allow NGA HR to protect employment rights and carry out its obligations which are relevant to the working relationship. You can find more information about this on our company intranet on the following link.
At Alight NGA HR, our mission is to innovate HR and payroll for today and tomorrow. We help our clients deliver seamless workforce services and empower HR as a strategic partner to drive data-driven decisions. As a result, HR leaders can offer better employee experiences, attract and retain talent more easily, manage the employee life cycle and support the globally connected, agile workforce.

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