



TOKIO MARINE
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TMK Inclusion, Diversity & Equality Policy

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1 Purpose, scope and governance of the Policy

1.1 Purpose of the document

The purpose of this policy is to set out the management approach, governance arrangements and the requirements and minimum standards to be adhered to within Tokio Marine Kiln ("TMK") for managing inclusion, diversity and equality.

Tokio Marine Kiln believes that everyone has the right to be treated with dignity and respect at work. We are committed to fair, unbiased and objective employment practices and a work environment which is free of harassment and victimisation.

TMK's success depends on its diverse workforce that daily contributes value through the variety of perspectives, background and culture. We achieve this by promoting diversity and creating a company culture that embraces individual differences where everyone can contribute and is empowered to be their best at work.

To that end the purpose of this policy is to provide equality and fairness for all in our employment and not to discriminate on grounds of gender, Gender Reassignment, marital status, race, ethnic origin, colour, race, national origin, disability, sexual orientation, religion or age. We oppose all forms of unlawful and unfair discrimination. TMK will also not discriminate because of any other subjective factors and will proactively maintain a culture that values inclusion, meritocracy, openness, fairness and transparency.

1.2 Scope of the document

This policy applies to all workers, whether permanent or temporary, including contractors and consultants. The policy applies to all global TMK locations and TMK, TMCSE and TMAM entities.

Related policies and documentation: The document should be read in together with the whistleblowing policy, grievance policy and disciplinary and dismissal policy.

Action/compliance: This policy must be understood and complied with by all workers.

1.3 Policy governance and review process

This policy is to be reviewed at least bi-annually and must be approved by the Group Head of Human Resources. Acceptance and adherence to this policy forms part of every employee's contract of employment.

2 Policy statements

It is our policy to treat job applicants and employees consistently and fairly.

The company aims to create a working environment free from unlawful discrimination, victimisation or harassment on any grounds. Employees are expected to treat all persons (including customers and clients) with the same courtesy and consideration.

All company policies and practices will be considered to incorporate these standards and it is the responsibility of every employee to implement and maintain the Policy. Objectives relating to fairness and inclusive practices will be included in all employee's performance goals and will form an integral part of performance reviews throughout the year.

Our commitment to Inclusion, Diversity & Equality is:

- To proactively maintain an environment in which individual differences and the contributions of all our staff are recognised and valued.
- To ensure the working environment promotes dignity and respect to all and in which no form of intimidation, bullying or harassment is tolerated.
- To ensure training, development and progression opportunities available to all staff.
- To regularly review all our employment practices and procedures to ensure fairness and that we uphold the TMK values.
- To ensure all people and business-related decisions based on factual, objective and relevant commercial information whilst mitigating personal bias. Irrelevant information will not form part of the process.

Behaviour, actions or words that transgress or breach the policy will not be tolerated and will be liable to disciplinary action.

2.1 Leadership

The company will:

- Identify a senior level champion for sponsoring the inclusion and diversity strategy
- Require that leaders actively and appropriately challenge behaviours and actions that transgress this policy
- Require that leaders understand the benefits of inclusion and diversity and promote the practices outlined in this policy in their respective business areas
- Establish an Inclusion and Diversity Forum to help design, promote and implement our strategy

2.2 People Processes

The company will manage fair, unbiased and objective employment practices that enable a culture of inclusion and appreciation of difference. We will regularly review policies and procedures to establish our position with regard to compliance and best practice.

a) Recruitment

Role outlines will accurately reflect the duties and responsibilities of the job. Person specifications will only include relevant selection criteria which are job related. We may actively look for skills that will complement the skillset of the existing team and harness diversity of thought but will always make recruitment decisions based on the person who is able to perform the role most effectively. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria, and of the need for their consistent application.

Suitability for employment is measured against the stated requirements of the job. Race, sex/gender, disability or age, sexual orientation, religion, nationality, pregnancy/maternity, social class or any other irrelevant characteristic of the individual or if applicable, that of another person, will not be used to assess how well the applicant will integrate with the workforce.

The selection process will accurately assess an applicant's knowledge, skills and ability to perform the duties of the job. Selection decisions will be based on objective, non-discriminatory and work-related criteria.

b) Career Development

The company aims to ensure that all employees have equal access to training and development opportunities. However some interventions may be implemented to address any under-represented groups. . Decisions about promotion and career progression are made on a fair and non-discriminatory basis and solely on the candidate's ability to carry out the job.

c) Performance and reward management

Performance ratings and payment of bonuses will be decided on a fair and non-discriminatory basis by business leaders and the HR team and will be based on an individual's performance against their objectives and their objective value to the business.

d) Disability and Reasonable Adjustments

TMK is committed to equal opportunities for all employees regardless of whether or not they have a disability. It is recognised that ensuring equal opportunities for disabled people may involve adjustments being made to the working environment or other employment arrangements. These adjustments will be made wherever reasonable and within a reasonable time frame.

The Equality Act 2010 prohibits discrimination because of a number of protected characteristics, one of which is disability. Both direct and indirect disability discrimination are unlawful, as is discrimination arising from a disability, discrimination based on association or perception, harassment and victimisation. A failure to make reasonable adjustments also amounts to disability discrimination.

If an employee becomes disabled whilst in employment, they will be given full support by their Manager and the HR department to maintain or return to a suitable role, appropriate to their experience and abilities.

Reasonable adjustments will also be made for other reasons than disability. This includes reasonable adjustments for religious observance.

e) Dismissal

The company will not unlawfully or unfairly discriminate in dismissal or selection for redundancy.

f) After employment has ended

The company ensures that it does not unlawfully or unfairly discriminate against ex-employees.

2.3 Learning and Development

The company will:

- Conduct regular training needs analysis relating to the understanding and management of inclusion and diversity
- Run regular programmes to develop a culture of inclusion and diversity
- Integrate inclusion and diversity into mainstream learning and development programmes

- Encourage networking groups and mentoring relationships to support employees
- Hold events to increase awareness and appreciation of difference

2.4 Measurement

The company will:

- Capture all available workforce metrics on a regular basis to benchmark against sector companies, demographics and best practice standards
- Agree the aspirational targets for the workforce composition in the future with the Chief Executive and Executive and review our progress against these
- Establish formal measurement tools to assess the climate in the organisation (for example regular staff surveys, 360° feedback mechanisms and diversity perception audits);
- Benchmark our progress accordingly relative to peers

2.5 Board Diversity

Tokio Marine Kiln values the benefits that diversity can bring to its board of directors (the "Board"). Diversity promoted the inclusion of different perspectives and ideas and mitigates against groupthink.

The promotion of a diverse Board makes prudent business sense and makes for better corporate governance. TMK seeks to maintain a Board comprised of talented and dedicated directors with a diverse mix of expertise, experience, skills and backgrounds. The skills and backgrounds collectively represented on the Board should reflect the diverse nature of the business environment in which the Company operates.

For purposes of Board composition, diversity includes, but is not limited to, business experience, geography, age, gender, social mobility and ethnicity. In particular, the Board should include an appropriate number of women directors.

Tokio Marine Kiln is committed to a merit based system for Board composition within a diverse and inclusive culture which solicits multiple perspectives and views and is free of conscious or unconscious bias and discrimination. When assessing Board composition or identifying suitable candidates for appointment or re-election to the Board, Tokio Marine Kiln will consider candidates on merit against objective criteria having due regard to the benefits of diversity and the needs of the Board.

Tokio Marine Kiln believes promotion of diversity is best served through careful consideration of all of the knowledge, experience, skills and backgrounds of each individual candidate for director in light of the needs of the Board without focussing on a single diversity characteristic and, accordingly, has not adopted targets regarding gender diversity on the Board.

3 Complaints and Compliance

Our grievance procedure is available to any employee who believes that they may have suffered unfair treatment or discrimination. Employees will not be victimised in any way for making such a complaint and complaints of this nature will be dealt with seriously, in confidence and within the time frame set out in the policies.

Any employee who acts, or instructs others to act, in a manner contrary to this policy will be liable to disciplinary action.

In the case of any doubt or concern about the application of this policy, the Human Resources Department should be contacted.

All complaints, associated correspondence and interviews will be treated in total confidence. However, it should be recognised that to carry out full investigations, it may be necessary to involve other individuals as deemed necessary.

4 Implementation of policy

All those persons referred to within the scope/eligibility of this document are required to ensure they understand it and adhere to its terms and conditions. They should be aware that behaviour inconsistent with its requirements will be liable to disciplinary action.

Line Managers are responsible for ensuring that this policy and its associated procedures are applied within their own area and for discussing any queries on the application or interpretation with HR prior to any action being taken.

The HR Department is responsible for maintaining and communicating HR policies and procedures and will seek input from relevant others within the business and consult with staff on changes where necessary. Any changes to HR policies and procedures will only be implemented following consideration and approval by the Group Head of Human Resources and, where necessary, in consultation with the Chief Executive Officer.



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