



**DEIB**

Global Diversity, Equity, Inclusion, & Belonging Policy.

**SIAPARTNERS**

I. Purpose

The purpose of this policy is to make clear Sia Partners' global position with respect to diversity, equity, inclusion, & belonging, and to reinforce our commitment to these principles. This policy establishes practices to best promote diversity and inclusion at our offices worldwide.

II. Scope

This policy applies to all Sia Partners offices and employees worldwide. This includes contractors and temporary workers. Local implementation of this policy and further development of its principles are expected to be implemented at the country level.

III. Rationale

All people have a right to the same opportunities for participation, acceptance, and belonging regardless of sex, gender, age, socio-economic status, race, language, beliefs, sexual orientation, physical or mental capacities or conditions, familial or marital status, or lifestyle. Sia Partners has developed this policy to ensure that diversity is recognized, celebrated and valued within its workforce and with its partners, and that equity, inclusion and belonging is achievable by all.

IV. Policy Statement

At Sia Partners, we are committed to fostering a diverse, equitable, and inclusive culture where our workforce and partners are valued, and which positions our company as a global leader in our competitive market. Sia Partners is committed to recruiting, developing, and promoting a diverse workforce while providing unique opportunities and career paths for our people. Our spirit of inclusion inspires innovation, creativity, and collaboration to help our clients make lasting and meaningful improvements and to attract and retain outstanding talent.

At Sia Partners, we are guided by the pursuit of perception and understanding not only of our clients and their unique challenges and needs, but also of our true selves and the freedom to bring our full, whole selves into the workplace. We aim to listen, observe, understand, and be understood.

This policy statement is further supported and elaborated by the policy standards described in Section VIII, Policy Standards, and the rest of this document.

V. Application

- A. This policy is presented to all Sia Partners employees, and contractors, at onboarding. Updates are communicated to all employees, and contractors, by email.
- B. This policy shall be reviewed annually or as needed.

VI. Responsibilities

- A. **Authors:** This policy was authored by a global team consisting of HR and recruitment leads, consultants, and the global CSR project manager, in consultation with leadership and with final approval by top management.
- B. **Updates:** Updates are managed by the CSR project manager, in consultation with HR and leadership.
- C. **Communication:** This policy and all subsequent updates are communicated globally by the CEO. Communication is reinforced locally by DEIB Sponsors, as well as by all people managers with respect to their teams.
- D. **Governance:** Questions about the policy, suggested modifications or local adaptations, should be addressed to the global CSR project manager.



VII. Relation to other policies

This policy should be read in conjunction with the following policies:

- A. Code of Conduct
- B. Annual CSR Report

VIII. Policy Standards

A. DEFINITIONS

Diversity, Equity, Inclusion & Belonging are referred to as **DEIB** throughout this policy.

Diversity refers to the differences of all people, recognizing the reality that each human being is unique. This includes, but is not limited to, diversity of gender, sex, race, ethnicity, age, sexual orientation, language, and other attributes.

Equity aims to ensure that all individuals have equal opportunities and access to what they need to succeed. Equity prevents individuals from being discriminated against or treated differently due to certain personality traits or physical characteristics.

Inclusion describes the practice of including and accommodating people, especially those who have historically been excluded. This transcends mere acceptance or tolerance; inclusion suggests that we embrace people, in all their diversity, and create an environment that encourages them to be their full, authentic selves.

Belonging is defined as the feeling of security and support when there is a sense of acceptance, inclusion, and identity for a member of a certain group or place. When people feel a sense of belonging, they can share ideas, confidently speak up, and fully contribute.

Allyship is the process, by a member of an ingroup, of emphasizing and supporting inclusion and human rights to advance the interests of a diverse and/or marginalized group.

B. BENEFITS OF DEIB

Increasing diversity allows us to benefit from a broader range of ideas and perspectives. By cultivating an inclusive culture in which all of our people are treated equitably, feel supported and are encouraged to be their authentic selves and express diverse viewpoints, we create space for increased creativity and innovation. DEIB boosts employee engagement and retention, and helps us to better understand our clients.

In short, DEIB is not only important for employee wellbeing; it is good for business.

C. CONTEXT

Sia Partners' commitment to DEIB operates across three pillars:

Attract diverse talent while motivating a culture of inclusion and celebration of unique identities

Develop our people by providing the best resources and opportunities to fulfill their goals and ambitions

Retain employees in a high-turnover industry by fostering a culture of belonging

DEIB is an important component of **Consulting for Good**, Sia Partners' Corporate Social Responsibility (CSR) approach. Consulting for Good encapsulates all sustainability efforts at Sia Partners, whether internal or external, working across four Labs: Social Responsibility, Climate Analysis, Ethics & Compliance, and Responsible AI. DEIB falls with the Social Responsibility Lab. While the present policy is internal, our DEIB efforts within this Lab include the development of innovative offerings for our clients as part of an ambition to leverage our expertise for next-level impact.

Our commitment to DEIB aligns with our six core values: Excellence, Entrepreneurship, Innovation, Teamwork, Care & Support, and Employee Wellbeing.

Our DEIB efforts further our commitment to the Ten Principles set forth by the United Nations Global Compact, of which Sia Partners is a signatory, particularly in the areas of labor and human rights.

D. EXPECTATIONS

All employees and contractors are expected to familiarize themselves with Sia Partners' global position with respect to DEIB, as conveyed by this policy, and to support and understand each other's differences in a manner consistent with the principles outlined herein. They are further expected to voice any concerns related to the policy or its implementation. This includes calling out discriminatory behavior, should they witness it. More information pertaining to employee behavior can be found in Sia Partners' Code of Conduct.

In addition to the above, people managers should ensure their teams are familiarized with all policy updates.

E. EQUAL OPPORTUNITY

Sia Partners is an equal opportunity employer. All aspects of employment, including hiring, promotion, remuneration, or discipline, are based solely on performance, competence, conduct, or business needs.

1. Equal Opportunity Statement in Job Ads

The above statement of equal opportunity, at a minimum, must be included in all of Sia Partners' job ads worldwide. All locations are strongly encouraged to further develop this statement to meet or exceed local standards.

2. Inclusive Recruitment Channels

As part of our effort to cultivate a more diverse and inclusive workforce, we actively engage with recruitment channels and networks which support DEIB. These may include events, organized by third parties or by Sia Partners, partnerships, networks, and so forth.

Inclusive recruitment channels must be integrated into the recruitment plans for all locations of major operation.¹

F. SAFE ENVIRONMENT

1. Definitions²

Discrimination is defined as the intended or accomplished differential treatment of persons for reasons of certain traits, like sex, gender, age, socio-economic status, race, language, beliefs, sexual orientation, physical or mental capacities or conditions, or familial or marital status.

Discriminatory harassment and bullying

Discriminatory harassment describes verbal or physical conduct that denigrates or shows hostility toward an individual because of their race, color, gender, national origin, religion, age, physical or mental disability, sexual orientation, or because of their opposition to discrimination or their participation in the discrimination complaint process. In general, harassment constitutes a legal issue when it creates an intimidating, hostile, or offensive working environment, or when it interferes with an individual's work performance.

Some examples of conduct that might constitute discriminatory harassment or bullying include:

- Racial epithets, "jokes," offensive or derogatory comments, or other verbal or physical conduct based on an individual's race/color
- Ethnic slurs, workplace graffiti, or other offensive conduct directed towards an individual's birthplace, ethnicity, culture, or foreign accent

¹50+ employees

²Definitions adapted from the United States Department of State

- Verbal or physical abuse, “jokes” or offensive comments based on an individual’s age, gender, disability, or sexual orientation
- Making, posting, emailing, or circulating demeaning or offensive pictures, cartoons or other materials in the workplace that relate to race, ethnic origin, gender or one of the other protected categories listed above.

A harasser or bully can be a supervisor, co-worker, or a non-employee who has a business relationship with Sia Partners.

Sexual harassment

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. The unwelcome conduct creates an intimidating, hostile, or abusive environment;
2. The unwelcome conduct unreasonably interferes with an individual’s work performance; or
3. An employment decision affecting an individual is made because the individual submitted to or rejected the unwelcome conduct.

Certain behaviors, such as conditioning promotions, awards, training or other job benefits upon acceptance of unwelcome actions of a sexual nature, are always wrong.

Unwelcome actions such as the following are inappropriate and, depending on the circumstances, may in and of themselves meet the definition of sexual harassment or contribute to a hostile work environment:

- Sexual pranks, or repeated sexual teasing, jokes, or innuendo, in person or via email, messaging

- services, or the like;
- Verbal abuse of a sexual nature;
- Repeatedly standing too close to or brushing up against a person;
- Repeatedly asking a person to socialize during off-duty hours when the person has said no or has indicated that they are not interested (supervisors in particular should be careful not to pressure their employees to socialize);
- Giving gifts or leaving objects that are sexually suggestive;
- Repeatedly making sexually suggestive gestures;
- Making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace;
- Off-duty, unwelcome conduct of a sexual nature that affects the work environment.

A victim of sexual harassment can be any sex or gender. The victim can be the same sex or gender as the harasser. The harasser can be a supervisor, co-worker, or a non-employee who has a business relationship with Sia Partners.

2. Cases of Discrimination or Harassment

Sia Partners does not tolerate any form of discrimination, bullying, harassment, or sexual harassment, whether within Sia Partners or in relation to clients or other third parties.

Employee Rights & Responsibilities

If any employee has experienced behavior which makes them feel uncomfortable, or believes they have been the target of discrimination, bullying, or harassment in any form, they are encouraged to inform the offending person orally or in writing that such conduct is problematic, unwelcome and

offensive, and must stop.

If the employee prefers not to communicate directly with the offending party, or if such communication has proven ineffective, the employee should raise an alert using the Grievance & Whistleblowing Procedure outlined in Sia Partners’ Code of Conduct, or by reaching out to a superior or HR representative.

To help Sia Partners best maintain a safe environment, we encourage employees to report incidents in a timely manner.

Sia Partners’ Responsibilities

If Sia Partners receives an allegation of discrimination or harassment, it undertakes to ensure that the matter is promptly investigated and addressed.

Procedure for Handling Cases of Discrimination or Harassment

Definitions

Grievant: person (or persons) filing the grievance
Respondent: person (or persons) named in the grievance

Note on disciplinary action

Disciplinary action is defined in local policies for Some Sia Partners locations.

a) Alerts raised via the Grievance & Whistleblowing Procedure against a Sia Partners employee

When an allegation of discrimination or harassment is raised via Sia Partners’ Grievance & Whistleblowing Procedure, the two dedicated global referents, listed in Sia Partners’ Code of Conduct, undertake to contact the HR representative responsible for the country where the grievance originated.

If the HR representative is the subject of the grievance, the referents contact the HR head for a different geography to carry out the investigation.

Pre-investigation Process

Upon receipt of the alert from the global referents and prior to contacting the grievant, HR determines, to the best of their ability,

- If the situation described in the grievance arose in the course of a Sia Partners program or activity
- Whether, if factually supported, the alleged behavior violates a Sia Partners policy
- Whether, if factually supported, the alleged behavior violates local or international law.

Investigation process

Within 3 business days of receiving the alert from the referents, HR contacts the grievant and explains the process below. If the grievant wishes to proceed with the process, HR contacts the respondent to inform them of the complaint made against them and explain the process below.

If the alleged behavior violates local or international law, HR will involve relevant legal entities, law enforcement.

1. HR conducts a one-on-one interview with the grievant, during which they gather all relevant information and communicate with the grievant any need for additional information.
2. Upon receipt of required information from the grievant, HR conducts an interview with the respondent, during which HR gathers relevant information about the situation in question.

3. If the grievant and/or respondent put forth witnesses, HR conducts additional, individual interviews with them.

4. Follow-up interviews are conducted as needed, individually, with the grievant, respondent, and/or witnesses. The grievant and respondent are at liberty to bring support persons and/or witnesses to any HR interview.

5. Participants in the process may be requested to document their statements. If a person declines to provide a written statement or sign a statement taken by the HR representative documenting their account of the incident(s), HR will conduct an investigation based upon the available information. Throughout the process, all involved will receive a fair, prompt, thorough evaluation, with the outcome documented in writing.

6. Corrective measures, including any disciplinary action, are up to the discretion of HR.

7. The outcome of the investigation will be communicated, in writing, to the parties concerned.

HR may involve legal authorities wherever necessary, at any point in the above process.

The two aforementioned referents are kept up-to-date on case developments throughout the above process.

With the exception of the referents and, where applicable, legal authorities, information pertaining to the case is kept confidential. HR and the referents undertake to protect the identity of all parties involved.

In cases involving Sia Partners offices in more than one country, an HR representative from each country carries out the above procedure in tandem. If disciplinary action is taken, HR implements policies local to the respondent. In the absence of such policies, the HR representatives decide together the best course of disciplinary action.

Post-investigation process

Immediately following the case resolution, HR ensures appropriate action is taken to support the grievant's wellbeing. This could include, but is not limited to, providing access to mental health services beyond the scope of the employee benefits package.

One month following the case resolution, HR conducts a follow-up interview with the grievant. The goal of this interview is to ensure that the employee feels safe and supported. If they do not, HR works with the employee to determine how to correct the situation.

b) Alerts raised via the Grievance & Whistleblowing Procedure against a third party

If a Sia Partners employee raises a grievance against a third party (e.g. a client, supplier) via the Grievance & Whistleblowing Procedure, the following procedure applies:

Grievances raised by a consultant against a client:

1. The process outlined in section a) is set in motion. The director in charge of the client project is informed.

2. If deemed appropriate by the director and HR, the consultant is removed from the project and replaced.

3. Where appropriate, either in lieu of action 2, or as an additional step, HR and the director raise an alert with the client, using the client's grievance channels.

4. Where possible, the procedure outlined in section a) is conducted in collaboration with the client's HR department. Where this is not possible, or as an additional step, Sia Partners asks the client to set in motion its internal grievance procedure.

Grievances against other third parties (e.g. providers)

1. The process outlined in section a) is set in motion.

2. In parallel, HR raises an alert with the third party, using the third party's grievance channels.

c) Alerts raised outside the Grievance & Whistleblowing Procedure against a Sia Partners employee or third party

While employees are encouraged to use the Grievance & Whistleblowing Procedure, they are at liberty to forego it.

If an employee raises a grievance outside this procedure (e.g. by alerting their manager), the person receiving the grievance, with the permission of the grievant, alerts HR. HR then follows the procedure outlined in section a).

d) Alerts raised against a Sia Partners employee by a third party

In the case of a grievance raised against a Sia Partners employee by a client or other third party, the following procedure applies:

1. The process outlined in section a) is set in motion. The third party's HR department is informed and kept up-to-date throughout the process. In cases involving clients, the director in charge of the project is informed.

2. Sia Partners cooperates with any grievance procedures set in motion by the third party.

3. Corrective action is agreed upon by Sia Partners and the third party. Any disciplinary action taken by Sia Partners is determined by Sia Partners. Depending on the local legal framework in place, employee representatives may be involved in disciplinary proceedings.

3. Anti-discrimination Clause in Client Contracts

Sia Partners undertakes to ensure that all client contracts include an anti-discrimination clause. This clause serves to protect Sia Partners employees and express, in addition to that which is already laid out in Sia Partners' Code of Conduct, our employees' commitment to non-discrimination.

G. INCLUSIVE CULTURE

Fostering a culture of inclusion and belonging requires the engagement of our people worldwide, with leadership setting the tone. Through the practices outlined in this section, Sia Partners endeavors to bring together our people across all geographies, encouraging knowledge sharing and lifting our global workforce to a common DEIB

baseline. We hold our leaders to a high standard, hold them accountable with respect to supporting their teams, and expect them to champion inclusion.

1. Training³

Our approach to DEIB training and development is anchored in an ambition to harmonize our convictions group-wide, across all 18 countries in which we operate. To this end, we provide training, via an external vendor, to the entirety of our workforce. This mandatory training is designed to establish a common denominator in terms of DEIB awareness, while requiring leadership to dive deeper.

Employees Worldwide

All employees of all levels and functions are required to complete **eLearning** modules, developed by an external vendor and deployed via Sia Institute, Sia Partners' learning management system (LMS). An Unconscious Bias training module must be completed by all employees within six months of their start date. Managers are responsible for ensuring that these modules are followed up and reinforced with discussion guides and other exercises. Additional modules, to be completed from year two, include but are not limited to an Inclusive Culture module.

Leadership Worldwide

In addition to the above eLearning, required of all staff, Sia Partners leadership⁴ worldwide are required to complete complementary **trainer-led workshops**. These tailored sessions provide a deep-dive into the topics covered in the eLearning

³Training is not required for contractors

⁴Managing directors and above

sessions. Sessions begin with an Unconscious Bias training and continue with an Inclusive Leadership training.

Local Training and Awareness Initiatives

In addition to the global training modules listed above, each location is strongly encouraged to provide internal training sessions and awareness initiatives to sensitize local employees to DEIB topics. These sessions or initiatives should further develop principles put forth in the global training sessions and/or focus on additional areas of local importance. Dedicated local action is essential as, legally and culturally, some issues and needs related to DEIB vary from one country to another.

Local training may be developed and administered internally or, where needed, provided by an external vendor. Locations interested in additional training from an external provider should coordinate with the global CSR Project Manager.

2. Sponsors & Role Models

If we are to foster a culture of inclusion, it is essential that our leaders champion DEIB at global and local levels.

DEIB Sponsors are designated leaders (managers and higher) who are committed to ensuring DEIB initiatives and policies are prioritised by their teams. Sponsors support local DEIB activity and networks, and may serve as a local point of entry for global DEIB communications.

They are expected to promote and reinforce Sia Partners' global DEIB efforts to local employees (e.g. follow-up global communications).

As needed, geographies with few employees may be grouped together, with a single DEIB Sponsor named for the group. In the same vein, geographies with a large workforce may name more than one DEIB Sponsor.

DEIB sponsors are identified at the local level, then liaise with the global CSR Project Manager.

Role Models are Sia Partners employees who, by their success, impact, and, internal and external engagements, inspire younger professionals. Role Models have two primary goals:

- 1.** Empower employees who are part of diverse communities; and
- 2.** Represent and promote Sia Partners' culture of inclusion to external stakeholders (e.g. clients, potential recruits).

A Role Model can be a representative of diverse communities, or an ally.

A Role Model is identified at the local level, and should fall under one of the following two categories:

- Senior management level⁵ : representative or ally
- Management level⁶ : representative

⁵Managing directors and above

⁶Managers and senior managers



A Role Model plays a highly visible role. They are expected to participate in events (internal and external, local or global), engage with external networks on behalf of Sia Partners, and act as the subject of corporate communication campaigns (e.g. profiles on Sia Partners' corporate website).

Role Models accomplish the above with the support of DEIB sponsors and local DEIB networks, working in liaison with the global CSR Project Manager.

3. DEIB@Sia Partners

DEIB@Sia Partners is our global employee network that brings our people together and enables us to support each other across the Sia Village. Country chapters of this network work to organize initiatives and establish local objectives in alignment with global DEIB objectives. Depending on geography and level of maturity, local DEIB@Sia Partners chapters may subdivide by stream (e.g. LGBTQIA+, Race & Ethnicity, Gender, Working Parents). DEIB Sponsors should be made aware of, support, and challenge local DEIB@Sia Partners activity.

The goal of DEIB@Sia Partners is to facilitate local progress and cultivate global visibility and knowledge sharing, so that we can work together, learn from each other, and lift each other up. To this end, regular global calls are organized throughout the year, during which leads⁷ from active DEIB@Sia Partners chapters come together with the global CSR Project Manager to share local updates. A written recap is made available to all DEIB leads. At least once per year, following the publication of Sia Partners' global CSR report, the leads provide a global update, which may take the form of a newsletter, webinar, email, or call.

4. Global DEIB Survey

Sia Partners sends an optional, anonymous, semiannual DEIB survey to the entirety of its workforce via Google Form.

The purpose of this survey is to measure how employees perceive and experience DEIB at Sia Partners, so that we can gauge and improve the impact of our practices, policies, and actions over time.

Survey questions are divided into three categories: Corporate Culture, Belonging, and Discrimination & Harassment. The questions in these sections are identical for all geographies.

In order to identify important trends, a separate Google Form is sent by geography. To ensure our employees' anonymity is protected, smaller geographies are grouped together for a pool of at least 50 employees. Any additional metrics (e.g. office location, business unit) are included only if they represent a pool of at least 50 employees.

Sia Partners also uses this survey to track, to a limited extent, a selection of demographics which, to date, cannot be tracked at the HR level. These demographics vary by country or region, and related questions are purely optional for respondents. Examples include questions about race and ethnicity, sexual orientation, and disabilities.

⁷DEIB leads are simply active members of the network who agree to provide regular updates on behalf of their geographies. This role is distinct from that of DEIB Sponsor; however, a DEIB lead could also be a Sponsor.

IX. Reporting

Sia Partners' DEIB metrics are published annually in the reports below, all of which are global.

- **CSR Report:** publicly available on our corporate website
- **UN Global Compact Communication on Progress (CoP):** publicly available on the UN Global Compact website
- **Ecovadis sustainability evaluation:** available on the Ecovadis online platform, or upon request from Sia Partners.

Additional metrics may be measured and reported at the local level.

X. Compliance

All Sia Partners employees and contractors are required to comply with this policy and all requirements associated with it. Non-compliance with the policy is grounds for disciplinary action, up to and including termination.

DEIB requirements are governed by laws, rules, and regulations in many countries in which Sia Partners conducts business. Not complying with those requirements can place Sia Partners and the non-compliant employee, or contractor, into a problematic situation. Local leadership is responsible for ensuring the implementation of this policy complies with all local laws, rules, and regulations.

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