



Purpose

This policy establishes the position of Sia Partners with respect to diversity, equity, inclusion, & belonging (DEIB) and, where possible, harmonizes best practices across the group.



Scope

This policy applies to Sia Partners employees worldwide, including contractors and temporary workers. Local implementation of this policy and further development of its principles are expected to be managed at the Hub or country level.



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.

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.



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.



Application & Expectation

This policy is presented to all Sia Partners employees and contractors at onboarding. Updates are communicated to all employees and contractors by email. 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.

This policy should be consulted and applied in conjunction with the following documents:

Group Code of Conduct Local employee handbooks and related policies Annual group ESG Report





CONSULTING FOR G COD

Consulting for Good

Consulting for Good is Sia Partners' global Environmental, Social, & Governance (ESG) approach, by which we strive to integrate ESG into the core of our business strategy, operations, and culture.

We are committed to implementing internal policies and practices which support our values, people, our community, and our planet. And as a consulting firm, we can greatly expand our impact by supporting our clients worldwide in their own ESG efforts, providing expertise and innovative solutions. This holistic approach integrates ESG into the DNA of our firm and, we believe, is the key to having a next-level impact.

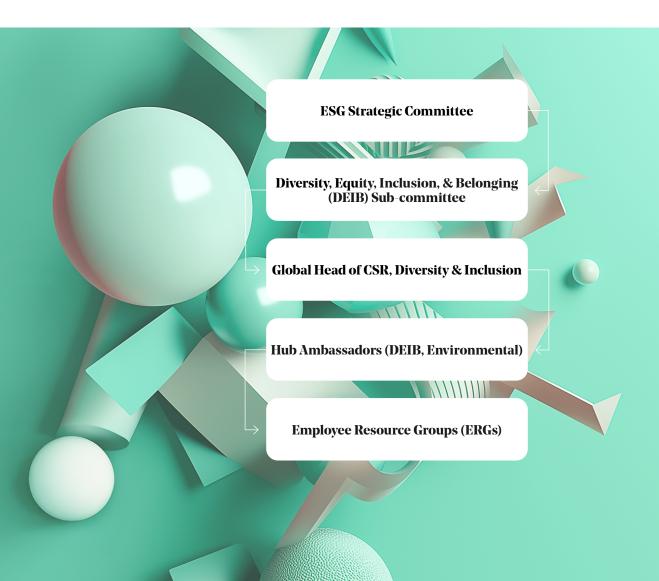
Through our Social Responsibility pillar, we are committed to building into our DNA a diverse, equitable, and inclusive culture, in which our people thrive in a sense of belonging.

DEIB

DEIB Governance

The group DEIB strategy, which includes an annual Action & Awareness Plan, is established at the C-level by the DEIB Sub-committee, a branch of Sia Partners' larger ESG Strategic Committee. The DEIB Sub-committee is led by two C-level leaders, appointed by the group CEO, with support from the Global Head of CSR, Diversity & Inclusion. The latter role also oversees strategy implementation, and is responsible for impact monitoring, reporting, and ESG ratings for the group.

The DEIB Sub-committee and Head of CSR, Diversity & Inclusion oversee a community of Hub Ambassadors. Selected by a Hub-level vote, Hub Ambassadors support local implementation of the group strategy and act as a bridge between the DEIB sub-committee and employees. Hub Ambassadors also develop and coordinate Employee Resource Groups (ERGs), which provide a space for our people who share common identities and interests to build community and raise awareness. Working together with the ERGs, Hub Ambassadors develop and drive a yearly awareness roadmap for their Hubs.



Overarching DEIB Ambitions

Sia Partners' commitment to DEIB is shaped by **five ambitions**:

Continue building a **culture of DEIB** where diversity, equity, inclusion, and belonging are deeply embodied in the company's DNA, values, and everyday practices.

Further develop **inclusive and equitable policies** that support our commitment to diversity, equity, and inclusion.

Attract, retain, and develop top talent from diverse backgrounds by creating an inclusive and equitable environwment where employees feel valued and empowered.

Extend our DEIB commitments down **our supply chain** by seeking diverse suppliers and contractors.

Continuously improve our DEIB program over time to ensure effectiveness and relevance.

Our commitment to DEIB aligns with Sia Partners' **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.



Definitions

The following definitions are high-level and should be considered in conjunction with all legal definitions in effect at the country level.

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

DIVERSITY

Diversity refers to the differences of all people and recognizes the reality that each human being is unique. This includes, but is not limited to, diversity of gender, sex, race, ethnic origin, age, sexual orientation, physical or mental ability or conditions, language.

EQUITY

Recognizes that obstacles to equality vary from one group to another. We do not all share a common starting point, or the same needs, on the path to equality. Equity accounts for the ways in which different groups are disadvantaged, or privileged, to ensure that individuals have access to what they need to succeed.

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 contribute fully.

ALLYSHIP

is the process, by a member of a privileged or 'in' group, of advocating for and supporting inclusion and human rights to advance the interests of a diverse and/or marginalized group.

DISCRIMINATION

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

SEXUAL HARASSMENT

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

- The unwelcome conduct creates an intimidating, hostile, or abusive environment;
- The unwelcome conduct interferes with an individual's work performance:
- **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 of gender. The victim can be the same sex or gender as the harasser.

DISCRIMINATORY HARASSMENT

Describes verbal or physical conduct that denigrates or shows hostility toward an individual because of traits like their gender, sex, race, ethnic origin, age, sexual orientation, physical or mental ability or conditions, national origin, or because of their opposition to discrimination.

Some examples of conduct that might constitute discriminatory harassment include:

- Racial epithets, "jokes," offensive or derogatory comments, or other verbal or physical conduct based on an individual's race or color
- Ethnic slurs, workplace graffiti, or other offensive conduct directed towards an individual's birthplace, ethnicity, culture, or foreign accent
- Verbal or physical abuse, "jokes" or offensive comments based on an individual's age, gender, disability, or sexual orientation
- Making or circulating demeaning or offensive images, messages, or other materials in the workplace that relate to gender, sex, race, ethnic origin, age, sexual orientation, physical or mental ability or conditions, national origin, or dimensions of diversity.

In general, harassment in the workplace constitutes a legal issue when it creates an intimidating, hostile, or offensive environment, or when it interferes with an individual's work performance.



Policy Standards

A. 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.

A.1 Equal Opportunity Statement in Job Ads

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

Sia Partners ensures employees have equal opportunities and equal access to advancement and promotion. The group undertakes to review evaluation processes and measure rates of promotion to ensure this is respected.

A.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. The use of inclusive recruitment channels must be integrated into the recruitment plans for all site of major operation[2]

Best practices endorsed by Sia Partners include diverse interview panels, blind recruitment processes, and diversity goals for hiring.

B. 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.

B.1 Training

Our approach to DEIB training and development is anchored in an ambition to harmonize our convictions across the group. Training courses are designed to establish a common denominator in terms of DEIB awareness and practices, while

requiring leadership to dive deeper.

All employees are required to complete a selection of DEIB eLearning courses, implemented as part of a broader Business Ethics learning path in Sia Institute.[3] These include, but are not limited to, the following topics:

- Unconscious Bias: understanding what unconscious bias is and why it's important, its relevance in the business world, and strategies to counteract it
- Cultural Intelligence: understanding the cultural dimensions and preferences that shape our thoughts, feelings, and behaviors at work, and building adaptability and empathy to work effectively in cross-cultural contexts

Completion of a **non-discrimination** course is a requirement for promotion to the **Manager** level. Integrated into Sia Partner's broader Ascent: Leaders of Tomorrow program, this course is designed to prevent all forms of discrimination, ranging from overt undesirable behavior to unconscious bias and microaggressions, by enabling managers to identify discrimination and build a team culture in which people feel empowered to speak up. The course is predominantly made up of trainer-led workshops.

The exemplarity of **leadership** teams is key to cultivating a culture of inclusion. Therefore, the principles conveyed in the mandatory training courses listed above are reinforced for this group through additional workshops and other initiatives.

Other mandatory DEIB courses may be added to the group training agenda at any point during the year.

Supplementary, **optional** group-level training opportunities may be proposed to further reinforce mandatory courses for all employees. These may take the form of panel discussions, workshops, or eLearning modules.

Additional DEIB training courses may be proposed or stipulated at the **Hub or country level**, tailored to the local climate. These are owned by local HR teams and subject to approval from the DEIB Sub-committee.

B.2 Raising Awareness

Raising DEIB awareness through consistent initiatives and communication is key to fostering a culture of DEIB. As part of the group Action & Awareness plan, an annual DEIB awareness theme (e.g. Allyship) provides direction to awareness-raising initiatives, at both the group and Hub levels.

Local awareness initiatives are championed by Hub Ambassadors and Employee Resource Groups (ERGs). ERGs, like Women & Allies, vary by Hub and provide a space for our people who share common identities and interests to build community and raise DEIB awareness. Hub Ambassadors work with ERGs to develop annual awareness roadmaps, which lay out awareness raising initiatives, like events and newsletters, to be implemented at their Hubs.

Global initiatives largely center on international awareness periods, and are driven by the Global Head of CSR, Diversity & Inclusion.

B.3 Leadership Commitment

If we are to foster a culture of inclusion, it is essential that our leaders champion DEIB at global and local levels. Sia Partners recognizes the importance of leadership buy-in to DEIB, and our governance structure reflects this belief. Sia Partners' ESG governance model places stewardship of the group DEIB strategy at the C-level.

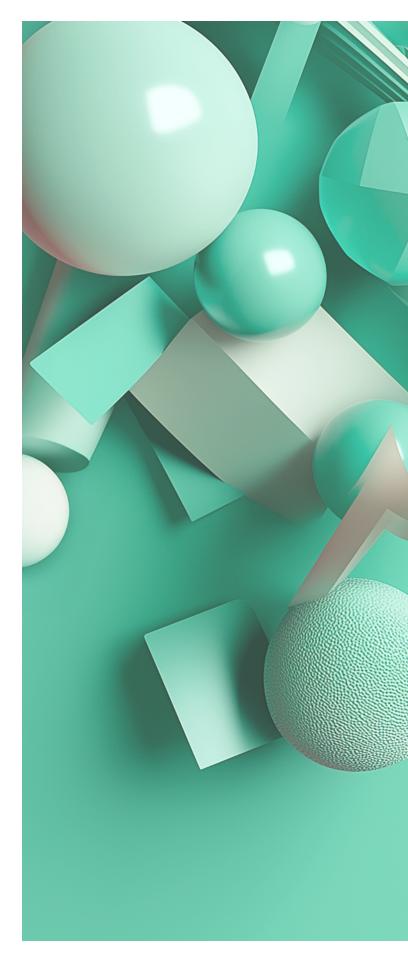
Leadership is expected to reinforce group DEIB communications and promote DEIB initiatives at their Hubs. Leaders are encouraged to support ERGs, either as members or executive sponsors, the latter of which assume an active role in driving the ERGs, working alongside Hub Ambassadors.

To further instill widespread awareness and consideration, DEIB is stipulated as a line item at group, Hub, and market-level Townhalls

B.4 Global DEIB Survey

As part of our commitment to continuous improvement, Sia Partners sends an optional, annual DEIB survey to its employees, which collects anonymous feedback pertaining to corporate culture, belonging, discrimination, and harassment. 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.

The survey consists of a set of core questions, which are identical for all geographies. These are supplemented by drill-down questions tailored by Hub or country. It also includes a set of demographic questions, which are country-specific and optional. These questions allow for both a greater understanding of Sia Partner's workforce composition and how survey results vary from group to group.



C. Safe Environment

C.1 Raising Alerts

Discrimination & Harassment

Sia Partners does not tolerate any form of discrimination, bullying, or 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 by reaching out to a supervisor, an HR representative, or by using the Grievance & Whistleblowing Procedure outlined in Sia Partners' Code of Conduct.

To help Sia Partners maintain a safe environment, employees are encouraged to report incidents in a timely manner.

Sia Partners' Responsibilities

If Sia Partners receives an allegation of discrimination or harassment, it undertakes to promptly investigate the matter.

C.2 Processing Allegations 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 Hub or country-level policies.

The following procedures are to be implemented following any allegation of discrimination or harassment.

C.2.i

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 during 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.

- 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.
- 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.
- 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 investigate 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 ketp confidential. HR and the referents undertake to protect 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.

Throughout the process, 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.

Post-investigation process

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.

C.2.ii

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 **C.2.i)** is set in motion. The director in charge of the client project is informed.
- 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 **C.2.i**) 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 **C.2.i)** is set in motion.
- **2**. In parallel, HR raises an alert with the third party, using the third party's grievance channels.

C.2.iii

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 a supervisor or HR representative), the person receiving the grievance, with the permission of the grievant, alerts HR. HR then follows the procedure outlined in section **C.2.i)**. HR also informs the Ethics & Compliance referents, within the group ESG Strategic Committee, of the grievance, respecting the grievant's wishes for anonymity.

C.2.iv

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:

- The process outlined in section C.2.i) is set in motion. The third party's HR department is informed and kept up-todate 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.
- 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.

D. Community Outreach

We encourage our employees to extend their efforts beyond the workplace and engage with the communities where we operate. This can include partnerships, outreach, and philanthropic activities that support diversity and inclusion. Initiatives to this effect, at the Hub-level, are proposed by Hub Ambassadors for approval by the DEIB Sub-committee and local leadership. Group-level partnerships and outreach are driven by the Global Head of CSR with approval by the DEIB Sub-committee and larger ESG Strategic Committee.

Responsabilities

Authors: This policy was authored by the Head of CSR, Diversity & Inclusion, together with the DEIB Sub-committee. Policy content was informed by input from an international, cross-functional team, consisting of CSR, HR, and recruitment professionals and employee representatives. The policy was approved by the group Executive Committee, HR leaders, and employee works councils.

Updates: This policy is reviewed annually by the DEIB Sub-committee and Head of CSR, Diversity & Inclusion. Updates are approved by the group Executive Committee, HR leaders, and employee works councils.

Communication: This policy and all subsequent updates are communicated with the group by the DEIB Sub-committee and Head of CSR, Diversity & Inclusion. Communication is reinforced locally by DEIB Hub Ambassadors, Executive Sponsors, and regional leadership.

Governance: Questions about the policy, suggested modifications or local adaptations, should be addressed to the Head of CSR, Diversity & Inclusion and the DEIB Sub-committee.

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Reporting

Group DEIB metrics are published annually in the reports listed below:

ESG Report: Communicated internally to all employees; available to external stakeholders on Sia Partners' corporate website

UN Global Compact Communication on Progress (CoP): Published on the UN Global Compact website

Ecovadis sustainability evaluation: Communicated internally to all employees; available to external stakeholders on the Ecovadis online platform or upon request

Further Hub or country-level reporting is managed by local HR teams.

[1] Hubs include: APAC; BENELUX; France, Morocco & Italy; Middle East; North America; UK & Ireland.

[2] 50 or more full-time employees

[3] Sia Partners' learning management system (LMS)



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.

The DEIB Policy and its application is subject, and therefore secondary, to laws and regulations applicable to our workforce. Local leadership and HR is responsible for ensuring the implementation of this policy complies with all local laws and regulations.

