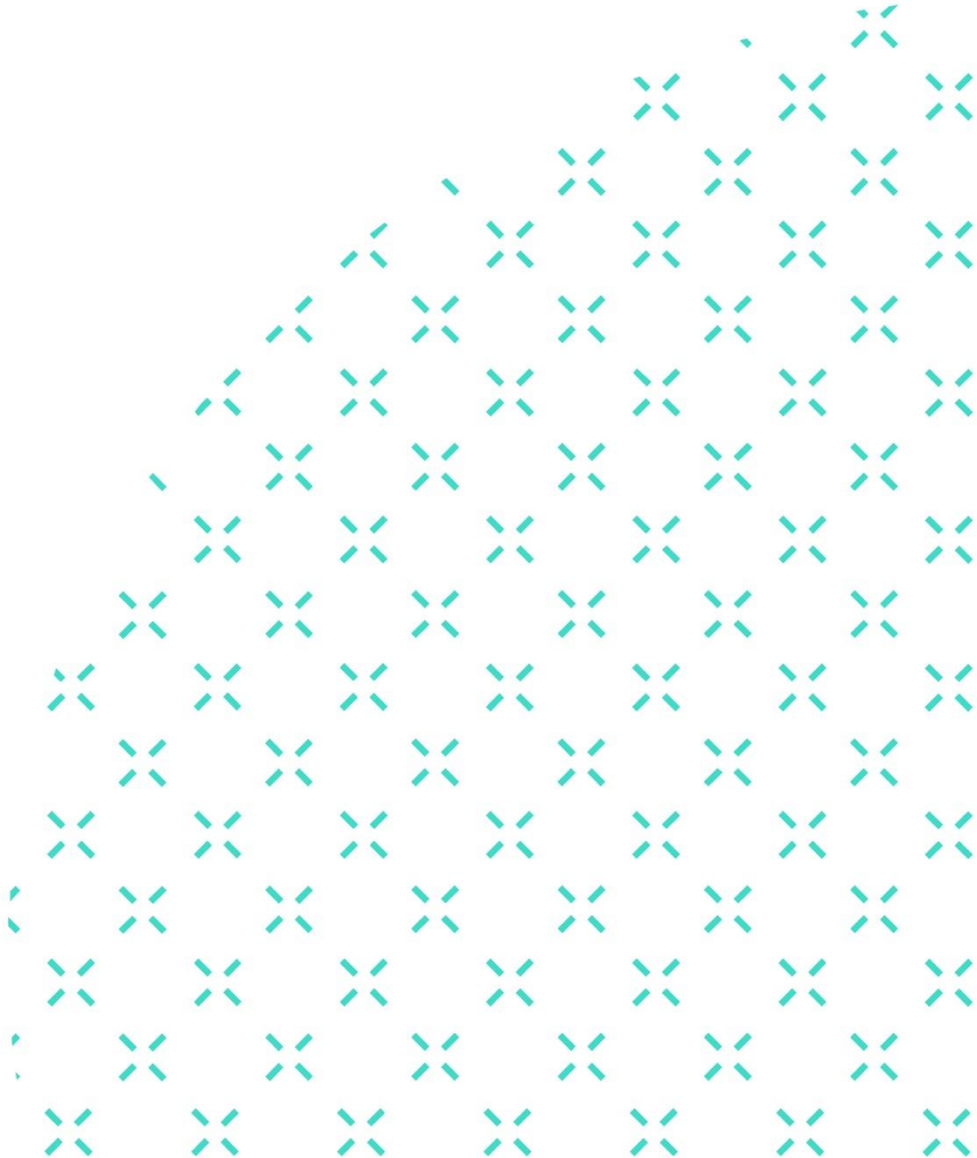


Inclusion and Diversity Policy



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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.

Our Vision

At St. James's Place, our vision is to create a vibrant place to work where difference is recognised as a strength and where talented people can flourish and achieve their highest potential. We know that talent is not dictated by race, ethnicity, gender or gender identity, disability, neurodiversity, sexual orientation, age, religion and faith, or socio-economic background.

As a leading financial advice business our success is built on delivering positive outcomes for clients through establishing meaningful and long-lasting relationships with all our stakeholders. We believe that being the best place to have a career is reliant upon creating a truly diverse and inclusive environment where broad perspectives are embraced, and people can be themselves.

We know that diverse teams and inclusive environments provide the foundations for creativity, innovation and business growth. That's why we aim to attract, retain and develop talent from diverse backgrounds. Our focus is on building a community with equal opportunities where everyone has clarity of purpose and feels valued, this in turn, helps us to deliver good client outcomes.

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

- **Unity** (Gender)
- **SJPride** (LGBT+)
- **disAbility** (Disability and neurodiversity)
- **EMBRACE** (Race and ethnicity)
- **Armed Forces (Military veterans)**
- **Working families**

Policy Statement

We believe in the value of difference and know that cultivating an inclusive culture helps us to benefit from those differences, in turn, supporting us to achieve positive outcomes for clients. Attracting, retaining and developing a diverse workforce is central to our approach. Quite simply, inclusion and diversity are vital ingredients 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, making our business stronger and driving creativity, innovation and continued growth. We embrace diversity, not just because it's the right thing to do, but because it makes our company stronger. 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.

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.

Policy Implementation

This policy can be found on our corporate website.

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 the human elements of decision making, projects or processes to ensure we remain representative, accessible, inclusive and avoid bias.

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

Objective and Rationale for the Policy

Our Inclusion and Diversity Strategy is centred around the core pillars of Attracting, Retaining and Developing diverse talent. Our goals 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, irrespective of any difference and breaking down barriers to career progression.

We will achieve these goals by developing our policies and procedures, educating our leaders, employees and Partners and embedding inclusive behaviours in our day to day work.

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

Related Documents

The SJP Plc Board maintains a Board Diversity Policy which applies directly to its members.

Glossary

Definitions

N/A

Acronyms

Inclusion and Diversity (I&D)

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

Exceptions to the policy

This policy applies to all entities of the company and is fully endorsed by the SJP Plc Board and the Executive Committee.

SJP's Asian 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 its Inclusion and Diversity Working Group and Employee 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. Concerns about illegal or improper behaviour in relation to inclusion and diversity can also be raised through our [whistleblowing 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	23 Nov 2023	Responsible Business Team	Annual update

SJP Group Inclusion and Diversity Policy

Review / Distribution

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

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

Appendices

N/A