



Aberdeen Diversity, Equity & Inclusion Policy (Global)

July 2025



Purpose

"We are committed to building a business that attracts brilliant talent; a business where all our people can thrive and belong, learn and develop and do their best work."

Our global diversity, equity and inclusion ("DEI") policy is more than a policy, it demonstrates our commitment and ambition to building a business filled with the very best talent that delivers better outcomes for our clients and customers every day.

This policy sets out how we'll do that by creating an inclusive workplace where all forms of difference are respected, celebrated and valued; where we will not tolerate discrimination, harassment, bullying or victimisation of any kind.

Who is this policy for?

This policy is all-encompassing, so that, no matter where you work, or how you interact with Aberdeen, you have a consistent and positive experience. It is Global and applies to all our Aberdeen Board members, subsidiary boards, colleagues (including all Aberdeen employees and third-party suppliers), agency workers, job applicants, business partners, customers and clients. For the purposes of this policy, we will refer to everyone collectively as "colleagues". It applies to everything we do when at work and at any work-related events, meetings or social situations outside of work. It's important to note that it also applies to views and opinions shared on social media.



The principles we stand by



At Aberdeen, we're committed to creating a workplace where everyone can thrive. These principles guide how we treat one another, how we work, and how we grow – together.

We treat everyone fairly and with respect.

We value each person for their skills and contributions, regardless of personal characteristics – whether actual, perceived, or associated. We do not tolerate unfair treatment, discrimination, or harassment of any kind, including sexual harassment.

Inclusion is part of every stage of the colleague journey.

Recruitment & Selection: We build diverse teams through inclusive, merit-based hiring practices, using objective criteria and offering flexible working arrangements.

Mandatory Learning: Annual training helps colleagues understand inclusive behaviours and the standards we uphold at Aberdeen.

Learning & Development: We embed inclusive principles in all learning opportunities, including dedicated programmes like Leading Inclusive Teams.

Inclusion is everyone's responsibility.

Every colleague plays a role in creating a workplace free from discrimination, harassment, bullying, and victimisation – where fairness, respect, and belonging are part of our everyday experience.

We listen and act.

Through our Colleague Council, regular pulse surveys, and **colleague-led networks and communities**, we listen to a diversity of voices and co-create meaningful change.

We follow local laws and global standards.

We uphold Diversity, Equity, and Inclusion principles in every country we operate in, complying with local legislation and regulations.

We use data to drive progress.

We regularly review and monitor our DEI outcomes, adapting our actions as needed. Where legally permitted, we collect diversity data to inform our actions – always handled confidentially and reported in aggregate to protect individual privacy.

We make reasonable adjustments.

We proactively support colleagues with disabilities or additional needs by removing barriers and promoting equitable access to opportunities.

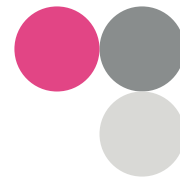
We take concerns seriously.

We investigate any complaints of unfair treatment, discrimination, or harassment – whether raised by colleagues, customers, suppliers, or others connected to our work.

We hold ourselves accountable.

Breaches of this policy may lead to disciplinary action, up to and including dismissal, in line with local legal requirements.

Speaking up and having your voice heard



We're committed to creating a culture of psychological safety where everyone feels safe, supported, and empowered to speak up. If you experience or witness behaviour that doesn't align with our principles and culture – including unfair treatment, discrimination, harassment (including sexual harassment), victimisation, or any other form of misconduct – we want you to feel confident in raising your concerns.

We offer clear, confidential, and accessible ways to report concerns. All reports are taken seriously and handled promptly, with care and discretion.

You can speak up in the way that feels most comfortable for you:

1. Talk to your manager

If you feel able, speak with your manager about your concern. If that's not possible, you can approach another manager you trust.

2. Use your local grievance process

You can raise a formal complaint through your local grievance procedures – either via your HR system or by contacting your local HR team. Your local Grievance Policy or equivalent will explain how we'll support you and work to resolve the issue.

3. Use our confidential Speak Up service

If you prefer to raise your concern anonymously, you can use our independent Speak Up service, managed by **Safecall**. While you can remain anonymous, please note that this may limit our ability to fully investigate if we can't speak with you directly.

About our Speak Up service

We're committed to operating with integrity and transparency. Our **Speak Up policy** supports anyone – colleagues or external stakeholders – who want to report concerns about malpractice or misconduct.

- Available 24/7, in multiple languages
- Open to colleagues, clients, customers, and suppliers
- Managed independently by Safecall for confidentiality and trust

What happens when you speak up

1. We investigate

Every concern is taken seriously. We'll carry out a prompt and thorough investigation.

2. We protect confidentiality

We'll keep your report confidential wherever possible, while fulfilling our duty to investigate properly.

3. We take action

If a breach is found, we'll take appropriate disciplinary or corrective action – up to and including dismissal – in line with local legal requirements.





Roles and responsibilities

Creating an inclusive and respectful workplace is a shared responsibility. Everyone at Aberdeen has a role to play in upholding the standards set out in this policy.

All colleagues

- Understand and follow this policy in your day-to-day actions.
- Treat others with fairness, dignity, and respect.
- Speak up if you witness or experience discrimination, harassment, bullying, or victimisation.

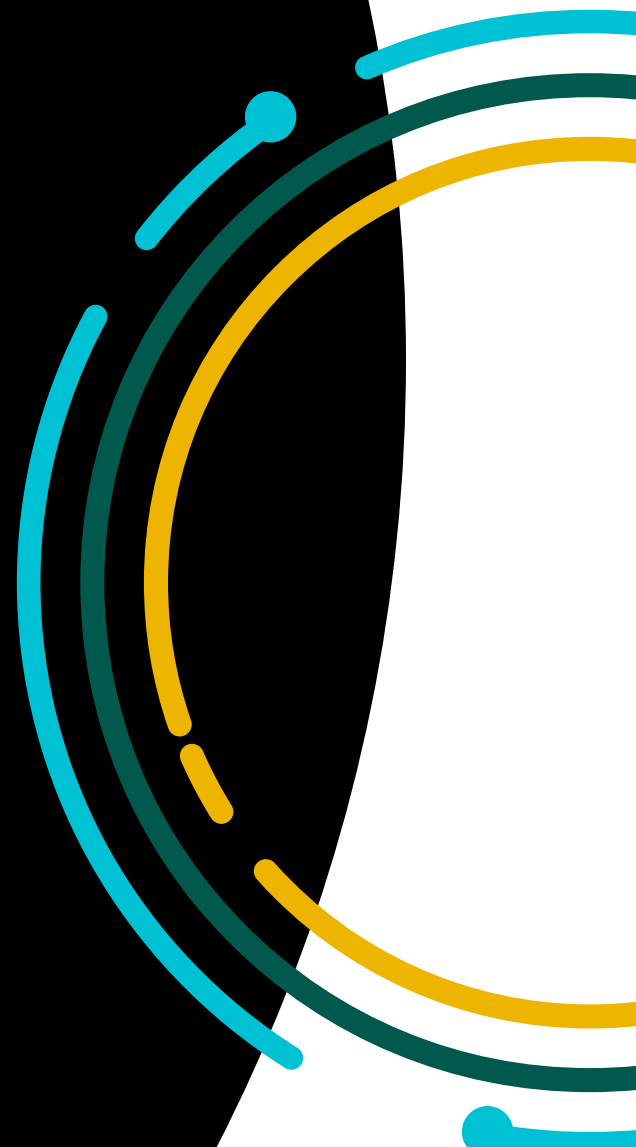
Important: Colleagues can be held personally accountable for acts of bullying, harassment, victimisation, or unlawful discrimination – whether directed at fellow employees, customers, or suppliers – during the course of their work.

Leaders and managers

We have set clear standards and expectations for leadership at every level across our organisation.

- Lead by example and ensure the standards in this policy are upheld within their teams.
- Address any behaviour that goes against our principles promptly and fairly.
- Create a safe space for colleagues to raise concerns and listen actively when they do.
- Ensure their teams complete all relevant training and development.

Board and executive leadership

- Provide visible and ongoing commitment to our DEI ambition.
 - Set clear expectations that unfair treatment or discrimination of any kind has no place in our organisation.
 - Monitor trends and outcomes related to this policy to ensure accountability and continuous improvement.
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Appendix:

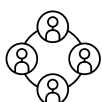
Review and governance

Our Nomination and Governance committee, who guide and govern our talent and culture agenda has oversight for DEI across the Aberdeen Group plc and the policy is reviewed at minimum 2-yearly.

This is how we define DE&I at Aberdeen:



Diversity: We define diversity in its broadest sense¹, this includes but is not limited to characteristics which are protected under: UK Equality Act 2010, USA title VII of the Civil Rights Act, Singaporean Workplace Fairness Act.



Discrimination: When a person is treated unfairly or differently or is harassed because of that person's actual, perceived or associated personal characteristics. This includes both direct (treating someone less favourably) and indirect (putting arrangements in place that apply to everyone, but result in someone with a protected characteristic being at an unfair disadvantage).



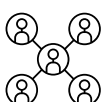
Harassment: Unwanted behaviour (physical, sexual, verbal or non-verbal conduct) that violates someone's dignity or creates an offensive environment.



Victimisation: Treating someone unfairly because they've complained about discrimination or harassment.



Unwanted conduct: Covers a wide range of physical, verbal and non-verbal behaviour including but not limited to: Unwelcome physical contact, violence, banter, "outing", derogatory comments.



Bullying: We regard bullying as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

¹ this includes but is not limited to our diversity of educational, professional and family backgrounds, experience, cognitive and neurodiversity, mental health, age, gender, gender identity or expression, marital or civil partner status, sexual orientation, disability or long-term health conditions, religion or belief, pregnancy, caring and parental responsibilities, and ethnicity and geographical origin.

* As a UK registered company, the relevant legislation which applies to our PLC Board on this subject is the UK Equality Act 2010.



