



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, enabling TMK to embed a safe, open, inclusive and empowering environment in which all our people can thrive.

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.

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 Chief People Officer. 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.

TMK 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 inclusivity will be included in all employee's performance and behavioural goals and will form an integral part of performance reviews throughout the year.

Our commitment to Inclusion, Diversity & Equality is:

- To embed an environment where all employees feel included, valued and can be at their best every day.
- 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.
- To be recognised as an employer where diversity is actively celebrated and encouraged, and where diversity of thought is harnessed.

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

TMK has a 4-point plan to help us achieve our inclusion, diversity and equality objectives, outlined in the next section of this policy. It is the responsibility of the HR team to implement our plan, although activities will be delegated to inclusion network groups where appropriate.

### 2.1 Leadership

Leaders at TMK must role model inclusive behaviours and commit to implementing practices that promote diversity.

- TMK's CEO is responsible for sponsoring the inclusion and diversity strategy
- Each of the TMK inclusion network groups will be sponsored by a member of the Executive or Underwriting Department Head.
- TMK will coach and train leaders to actively and appropriately challenge behaviours and actions that transgress this policy
- TMK will ensure that leaders understand the benefits of inclusion and diversity and promote the practices outlined in this policy in their respective business areas
- TMK will use senior managers as role models to promote diversity in the business
- TMK will assess each member of the Executive within its annual performance management process on how inclusion and diversity initiatives are implemented in their

respective areas of the business as well as progress against achievement of diversity targets.

- TMK will operate an Inclusion and Diversity Steering group to help design, promote and implement our strategy and ensure successful outcomes.

## 2.2 People Processes

TMK 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 ensure compliance and best practice.

### a) Recruitment

Role outlines will accurately reflect the duties and responsibilities of the job. Person specifications will include relevant selection criteria which are job related. The HR team challenges where appropriate on certain requirements such as technical expertise or qualifications such as degrees. In writing the person specification, TMK will also identify skills, knowledge and experience that would promote more diversity and avoid groupthink. This process will be followed for employees as well as Board Members. This may include considering candidates from outside the insurance industry where appropriate. We will always make recruitment decisions based on the person who is able to perform the role most effectively.

TMK actively promotes diverse applicants by advertising on job platforms that promote diverse talent. TMK also uses Gender Decoder to review language in job descriptions and job adverts to promote more gender diversity at application stage. Flexible working is also promoted in job adverts where this is given. The recruitment team will publish a recruitment agency charter to ensure we receive diverse shortlists from our recruitment agencies.

TMK will promote its associations to attract diverse talent, such the provision of internships and placements to members of the Afro-Caribbean Insurance Network.

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

TMK aims to ensure that all employees have equal access to training and development opportunities. However, positive action initiatives may be implemented to address any gaps in under-represented groups. Decisions about promotion and career progression are made on a fair and non-discriminatory basis however and on the candidate's ability to carry out the job.

TMK will assess diversity of succession plans through its annual succession planning exercise. Under representation that might impede diversity will be addressed by the sponsorship of diverse talent with leadership potential from members of the Executive and senior management team.

TMK will also introduce a mentoring programme offering both structured and unstructured mentoring to ensure that a number of diverse individuals with leadership potential are given support in order for them to progress.

TMK sponsors diverse talent to enroll on industry-wide development programmes that develop diverse talent in the insurance market. Examples include the Insurance Breakfast Club and Lloyd's Advance and Accelerate programmes.

### 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 the extent to which behaviours have been demonstrated in line with the company values.

TMK runs an annual calibration process to ensure that performance ratings are not subject to line manager bias.

The HR team will analyse ratings and rewards with diversity data to ensure that a particular group is not treated favorably or unfavorably.

#### 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. TMK is a disability confident employer, as recognised by HM Government.

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) Flexible Working

TMK promotes flexibility wherever possible and empowers employees to set their work location and schedule that works most effectively for them, as long as this does not adversely impact the business. TMK's flexible working policy sets out our approach to informal flexibility, known as "dynamic working" whereby informal arrangements can be made by employees and their managers; as well as more formal flexible working including part time, job shares and career breaks.

#### f) Dismissal

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

#### g) After employment has ended

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

## 2.3 Learning and Development

TMK 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 including unconscious bias training for all employees and managers
- Integrate inclusion and diversity into mainstream learning and development programmes

## 2.4 Awareness & Engagement

TMK will:

- Encourage and support inclusion network groups to support employees and to help drive action in different areas of inclusion and diversity

- Promote awareness of inclusion and diversity issues and celebrate diversity by holding regular internal events.
- Encourage and support our colleagues to speak and feature at external events
- Develop internal and external communications plans to promote inclusion and diversity at TMK
- Develop associations with external associations, charities and networks to help drive activity and to demonstrate our commitment and support.

### 3 Board Diversity

Tokio Marine Kiln values the benefits that diversity can bring to its board of directors (the "Board"). Diversity promotes 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. The board must have the capacity to challenge across the full range of the firm's business. This will be reviewed in the annual board skills matrix review.

For purposes of Board composition, diversity includes, but is not limited to, business experience, skills, knowledge, qualifications, 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.

During the recruitment process for a Board and/or Executive position, Tokio Marine Kiln will identify not only the skills, knowledge and experience required for that position, but also the behaviours, skills, knowledge and experience that benefit the Board more broadly. Role outlines will accurately reflect the duties and responsibilities of the job. Person specifications will include relevant selection criteria which are job related. In writing the person specification, TMK will also identify behaviours, skills, knowledge and experience that would promote more diversity and avoid groupthink and to increase and provide appropriate levels of challenge. The board skills matrix will be reviewed to aid with this process. TMK will also ensure that several key individuals are involved in agreeing the job description and person specification for each board position, to ensure a range of views are considered. This will include the Chair, the CEO, the Chief People Officer and at least one other board member.

### 4 Measurement of policy

TMK will measure progress against our inclusion and diversity objectives by collecting diversity data as well as feedback from employees. Our key performance indicators will be measured at regular intervals and will be communicated to all staff and reported to our ESG and Nomination & Remuneration Committees.

Measure	Target	Reporting timeframe
Gender balance at Board and Executive level	29% by end of 2023	Quarterly
Gender balance at all leadership level	35% by end of 2023	Quarterly
Gender Pay Gap	An average yearly 2-3% reduction	Annually
Ethnicity balance at Board and Executive level	TBC	Quarterly, beginning in Q1 2021
Ethnicity balance at all leadership level	TBC	Quarterly, beginning in Q1 2021
Responses to inclusion questions in engagement surveys	85% or more favourable responses by end of 2021	Annually
Responses to inclusion questions in exit interviews	85% or more favourable responses by end of 2021	Bi-Annually
Diversity data collected	75% of staff by end of 2020 80% of staff by end of 2021	Annual

## 5 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.

## 6 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 Chief People Officer and, where necessary, in consultation with the Chief Executive Officer.

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