



|MV|Credit

Diversity Equity and Inclusion Policy

January 2023

1. Purpose

MV Credit (the “Company”, “our”, “we”, “us”) is committed to creating an inclusive working culture where differences are welcomed and valued, and everyone feels a sense of belonging when at work. This should create an environment where everyone can contribute, add value, be themselves and reach their full potential in a way that is consistent with, and adheres to, our ethics.

Our aim is to be an organisation where people feel involved, respected and connected to our success.

By “Policy” we mean a plan of what we do in particular situations that has been agreed to by us. This policy sets out our approach to diversity, equity, and inclusion (“DEI”) at work and outlines the principles that will help us embed an inclusive culture that is integral to our values and ambitions for the future.

This policy applies to staff both on and off the Company’s premises, including those working remotely and to visitors to any of our office.

2. Applicability and Scope

This policy applies to our staff internationally and may be supplemented by local and/or country-specific policies if required by local law. This policy does not override any applicable processes and laws in the countries in which we operate.

We expect everyone at the Company (employees, officers, contractors, suppliers and all third parties working with us, including staff employed on a temporary basis (together, “staff”), to commit to upholding the highest standards of behaviour and driving the Company’s commitments to DEI.

This policy does not form part of any employee’s contract of employment, and we may amend it at any time.

3. Policy

Welcoming everyone to the Company, embracing and respecting their unique characteristics, experiences and thoughts allows us to bring many different voices together to provide the best-in-class service to our clients. Being truly inclusive means that all colleagues feel valued for their experiences, differences, views, and contributions, and feel a sense of belonging at the Company.

In fact, people with different backgrounds, skills, and attitudes, bring fresh ideas and perceptions. All staff should proactively look to encourage and harness these differences to maximise innovation, problem solving and productivity. By embracing these fresh ideas and differences the company will continue to evolve and makes improvements as a result.

All line managers must lead by example and ensure that employees and any other relevant staff under their jurisdiction are fully aware of this policy and are fully supported and encouraged to report incidents of suspected, or actual, inappropriate behaviour which do not align with this policy.

Everyone must adhere to this policy and is accountable for embodying our aims and objectives regarding DEI as set out in these principles:

- An inclusive working environment where individual differences are valued and respected and in which each member of staff can fulfil their potential and maximise their contribution.
- No member of staff will receive less favourable treatment on the grounds of sex or gender (including identities or expressions), marital status, age, race, ethnic origin, sexual orientation, religion, belief, or disability, or be disadvantaged by requirements or conditions which cannot be justified by the Company. Similarly, staff must adhere to the principle of no less favourable treatment on such grounds as part of their dealings with clients, suppliers, and visitors. The only criteria acceptable for determining recruitment or advancement at work are objective criteria which avoid bias, including ability, qualifications, relevant experience and/or aptitude for the required work.
- Our commitment to DEI applies to the entire employment or engagement (as relevant) life cycle, including recruitment and selection, performance management, promotion and career progression, terms, and conditions of employment, conduct at work, working environment, training and development, leave requests, redundancy and re-deployment and termination of employment or engagement.

3.1. Definitions

- **Diversity** – Diversity involves all the ways that people are different, including the different characteristics that make one group, individual or intersectional different from another. For example, a person may belong to a certain demographic and ethnicity that differs from others in a group.

- **Equity** – Equity aims to ensure the fair treatment, access, equality of opportunity and advancement for everyone while also attempting to identify and remove the barriers that have prevented some groups from fully participating.
- **Inclusion** – Inclusion builds a culture where everyone feels welcome by actively inviting every person or every group to contribute and participate. Inclusion will ensure that everyone feels valued and importantly, adds value.

Under this policy, all staff commit to preventing or reducing the effects of the following in their role at the Company:

- **Bias** –being prejudiced against one group or in favour of another, in a way that disadvantages, or unfairly advantages, a particular group. It can be conscious or unconscious and can have influenced the design of processes and frameworks that have been around for a long time.
- **'Microaggressions'** - the everyday slights, indignities, put downs and insults that people of colour, women, disabled, LGBTQ+ populations or those who are marginalised experiences in their day-to-day interactions with people.
- **'Tokenism'** is the practice of making only a symbolic or perfunctory effort to be inclusive to members of minority groups.
- **'Sexism'** prejudice, stereotyping, or discrimination, typically against women, based on gender.
- **'Gaslighting'** is a colloquialism for a specific type of action which, if successful, causes the target (a person or a group of people) to question their own reality, memory, or perceptions. There is often a power dynamic in gaslighting where the target is vulnerable because they are fearful of losses associated with challenging their treatment. In the context of bias and microaggressions, gaslighting can compound issues if people raise concerns and are told that they are imagining things. Whilst this term could be interpreted such that there is intent on the part of the actor to gaslight a person, that is not always the case, particularly in contexts where a person believes the receiver to be imagining the issues or the incident which took place. This is likely due to a lack of awareness and understanding of impact, without the intention to cause harm.

3.2. Company Commitment to Staff

Support – if you experience (or witness another person experiencing) behaviours which are contrary to this policy, consider whether you feel able to raise the problem informally with the person responsible. If you have any concerns, you should also speak up about the behaviour using one of the following channels who can provide confidential advice and assistance in resolving the issue formally or informally:

- Your line manager or another senior leader within your organisational structure
- MV Credit HR

If you are not certain whether an incident or series of incidents amounts to a breach of this policy, you should initially contact one of the above channels informally for confidential advice.

Subject to the nature of the incident, we will attempt to resolve the issue in a timely and informal way, if appropriate and in line with the Company Handbook. Managers are responsible for notifying HR promptly upon receiving or becoming aware of a breach of this policy.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and/or a legal obligation under certain circumstances and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

Where appropriate, we will investigate complaints in a timely and confidential manner and expect that all staff keep information relating to any investigation confidential and fully cooperate in any investigation of concerns raised in line with Company policy and practice.

Training – we will help to ensure all relevant staff understand the principles of DEI and how to apply them to their working life. We will do so by providing appropriate and regular training and routinely updating all relevant staff on important legislation and standards and procedures related to this topic.

4. Exceptions

There may be different personal characteristics which are protected by law in the various countries in which we operate, and the personal characteristics listed above do not override any additional characteristics which have local protection. However, they set out the minimum characteristics which the Company considers to be protected in this context as a matter of Company policy.