

Morgan Stanley

INVESTMENT MANAGEMENT

Diversity, Equity & Inclusion

Guidance for Creating an Effective
Corporate DEI Strategy and Policy

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Why DEI?

The business case for implementing a DEI policy

A diverse and inclusive workforce is more likely to...



Attract and retain top talent

- When employees feel valued, respected, and included, they are more likely to be engaged, motivated, and productive
- This, in turn, boosts employee morale, satisfaction, and retention
- Organizations with inclusive policies see a 50% reduction in employee turnover and a 56% increase in job performance¹

Generate better business decisions

- By embracing diversity and actively including people from various backgrounds, organizations can tap into a broader range of insights and knowledge
- Research has shown that inclusive and diverse teams have greater diversity of thought, and therefore make better business decisions
- Cognitive diversity leads to better business decisions and more creative ideas
- Companies in the top quartile for gender diversity on executive teams were 25% more likely to have above-average profitability than companies in the fourth quartile²

Bolster revenue by appealing to a wide customer base

- Consumer buying power is more diverse than ever, and customers and clients increasingly expect organizations to prioritize diversity and inclusion
- They want to engage with companies that reflect and understand their diverse needs, values, and perspectives
- Having a DEI policy not only aligns with societal expectations but also enhances an organization's reputation, credibility, and customer loyalty
- Over the past 30 years, minority buying power in the United States has increased exponentially (from US\$458 billion in 1990 to US\$3 trillion in 2020). Native American, Asian American, and Black consumers now account for 17.2% of the US' total buying power.³

¹ Deloitte, 2022

² McKinsey, 2020

³ Deloitte, 2022

DEI strategy and policy project management

Suggested process for 'filling in the gaps'

Step 1: DEI Strategy Ownership

- Determine which individual(s) within the firm will take ultimate ownership of your DEI strategy and the creation and implementation of your DEI policy. This individual(s) should have experience of, or experience related to DEI as part of their primary function, for example, Head of HR. Alternatively, it could be an individual with a demonstrable passion for DEI

Step 2 (Optional): Employee Survey

- Consider conducting an anonymous and confidential firm-wide survey on DEI to gather thoughts and opinions from your wider employee base to help shape your approach to your DEI strategy and policy (see Annex I for a template DEI employee survey)
- Share the results with employees and explain how the results will be used

Step 3: Idea Generation

- Establish an internal working group on DEI. In the spirit of strong DEI, this working group should be comprised of individuals from diverse backgrounds (to the extent that this is practical) and from different business units within the group. The working group should also include senior decision-makers within the firm.
- Request members of the working group to review the material in this document, specifically:
 - Reflect on current performance
 - Consider the best practice examples provided
 - Review competitor DEI policies, or those within the wider industry
- Conduct an internal workshop with the members of the DEI working group. Using the framework laid out in this document, use the workshop to:
 - Determine your overall ambition level
 - Address the key considerations for each element of the 10-point framework—ask yourselves each question and brainstorm as a group
 - Assign responsibilities for the drafting of each section of the DEI policy
 - Agree next steps and timeline for completion

Step 4: Policy Creation

- Draft your new policy
- Seek further input from working group members and other employees as appropriate
- Sign off policy and publish (publicly, preferably)

1GT DEI Framework

10 common elements of a robust DEI policy

A strong Diversity, Equity and Inclusion strategy requires putting policies and processes in place that comprehensively addresses each of these three pillars. Based on our internal expertise, we have created a framework that explores what we view as the 10 common elements of a robust DEI policy.

The guidance contained within this document is not intended to be adopted wholesale, rather it is intended to support your firm's development of its own DEI policy that reflects its beliefs and ambitions, by providing best practice guidance and illustrative examples.

ELEMENT	DESCRIPTION	PRIORITY	PAGE
 INTRODUCTION	Setting the tone for your overall approach to DEI	1	4
 ANTI-DISCRIMINATION	Define what discrimination means for the firm	1	8
 EQUAL EMPLOYMENT OPPORTUNITY	Providing equal opportunities to all	1	12
 REPORTING & ACCOUNTABILITY	Establishing mechanisms to tackle discrimination or bias	1	16
 GOVERNANCE	Putting governance structures in place to help deliver on DEI strategy	3	19
 RECRUITMENT	Attract (and retain) a diverse pool of candidates	2	22
 TRAINING & EDUCATION	Empowering all employees to take DEI into their own hands	3	28
 INCLUSIVE CULTURE	Fostering a culture of inclusion for all	1	30
 DATA & METRICS	Selecting the metrics—and setting targets—relevant for your business	2	34
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Introduction

Setting the tone for your overall approach to DEI



Background

- Your DEI policy can be thought of as a kind of manifesto. It's a public-facing document that aims to communicate your beliefs, what you want to achieve, and how you plan on doing it. Before going into the detail, your policy should begin with an introductory section that summarises the foundations on which the rest of your policy are built.
- This section is important for setting the overall tone for your firm's DEI strategy by establishing the ambition level of your firm in relation to DEI. It also helps to convey to your firm's stakeholders how integrated DEI is in your operations.

Considerations

- What will our DEI policy aim to achieve? How ambitious do we want to be?
- What do we believe about DEI? Why do we think that way?
- How can we communicate our firm's commitment to DEI?
- What will the firm look like if our DEI strategy is implemented successfully?
- What are the key takeaways readers of our DEI policy should have?
- How do we want our stakeholders to view the firm in terms of DEI? How does that compare to our peers and wider industry?

Guidance

- **OPENING STATEMENT:** Draft an opening statement that summarises your commitment to DEI and the purpose of the policy. Keep your opening statement sharp, simple, and succinct. This will be the first thing your stakeholders see and it should capture the spirit of your DEI policy without the need for too much detail at this stage.
- **ATTRIBUTION:** The commitment communicated through the opening statement will be more powerful if it is attributed to the CEO. This will signal to the firm's stakeholders that DEI is a topic taken seriously within the firm, and is on the agenda of the firm's uppermost senior management. If your firm has a CDO, it may make more sense to be attributed to that individual.
- **CORE BELIEFS:** Define your firm's core beliefs in terms of DEI, and why you believe it is beneficial to your business. For example, you could brainstorm to come up with your own definitions for 'diversity', 'equity' and 'inclusion', you could reference research that demonstrates a link between diversity and financial performance, or that you want to champion DEI simply because you think it is the right thing to do.
- **VISION:** It can be useful to set out what the vision of a diverse, equitable and inclusive future looks like at the firm, since the purpose of the policy should be to help guide the firm in realising its vision. Making a clear commitment to that vision tells your stakeholders exactly what you seek to achieve through the implementation of the policy. For example, this may be a simple bullet point list describing your headline goals, or a more visual framework.
- **AUTHENTICITY:** Above all, your introduction should be authentic to the firm and management's commitment to DEI. Use language that accurately reflects the ambition level within the firm. For example, do NOT use words such as "best in class" or "industry leading" if this does not reflect the action the firm is prepared to take to further DEI.

Best Practice Example 1

Setting the tone for your overall approach to DEI



Transforming the BBC

"Our ambition is to create a transformed, modern organisation where you are happy, treated fairly, doing outstanding creative work, clear about expectations and focused on delivering value for all. Everything we do relies on us attracting and retaining the finest talent by creating an inclusive, diverse, inspiring and trusted environment. There is much to be proud of, but we must make changes. We want everyone to commit to making a better culture."

Tim Davie

BBC Director-General

TIP Opening statement on transformation of the whole firm by a senior leader, demonstrating strong commitment from the top down

1. EXPANDING THE POOL OF DIVERSE SENIOR LEADERS

We will have diverse succession pipelines for all Band F and Senior Leader (SL) roles. This will include targeted mapping of both internal and external talent.

2. INVESTING IN DIVERSE LEADERSHIP

We will introduce a high potential leadership programme with significant diverse membership, reflecting our ambition to meet our 50:20:12 targets, and beyond.

3. THE BIGGEST EVER GROWTH IN ENTRY-LEVEL OPPORTUNITIES

We plan a significant boost in apprentices at entry- and mid-career level and an expansion of the Assistant Commissioner Programme into other roles across the BBC.

TIP DEI-related goals are realistic and achievable (by setting out the comprehensive and tangible action the organisation intends to take to get there), but at the same time ambitious and aspirational.

4. SETTING A GOLD STANDARD FOR INCLUSION

We will create an extensive programme of inclusive behaviour training to support an inclusive culture, supported by a pan-BBC campaign around seeking out and paying attention to new perspectives.

5. GREAT EMPLOYEE NETWORKS

We want to reform our D&I staff networks to help them work strategically on behalf of employees and audiences, and contribute to the success of the BBC into the future.

6. A BBC FOR ALL OF US

We will identify and champion 100 diverse role models.

7. ACCESSIBLE FIRST

We will tackle a culture of 'ableism' with a new approach to accessibility in everything we do.

8. TRANSFORMING RECRUITMENT

We will set up a radical end to end review of systems, processes, attitudes and outcomes.

9. CAREER DEVELOPMENT FOR ALL

We will create opportunities for all employees to fulfil their potential and take responsibility for their career.

10. MEASURING OUR SUCCESS

We will share a new BBC-wide framework for performance, development and metrics, starting with a Senior Leader Index.



Explaining Diversity & Inclusion

TIP Comprehensive explanation of **what diversity and inclusion means at the company** and specifically how it affects their company, provided by the company's DEI subject matter expert

"Diversity isn't simply about assembling the right ratio of people with different characteristics or identities. It's about understanding why those differences are valuable. Firstly you start to think beyond legally protected characteristics and you embrace all the nuanced varieties of 'us' - those who make up our workforce and our audiences.

Secondly, from a business perspective, you stop thinking about diversity as a problem to be solved and you start thinking of it as an essential component in driving continuous improvement, success, engagement, and creativity, which in the BBC's case is our lifeblood. Without a wide range of backgrounds, perspectives, lived experiences, and ways of working we immediately limit our creative capacity.

But it's impossible for me to speak about diversity without discussing inclusion. If we don't address the issue of inclusion within our organisation, diversity will be seen as a failed experiment. We'll throw our hands in the air and say, "Well, we recruited, we trained, we let them in... but we didn't keep them. And the ones we keep, they aren't present, they aren't engaged."

So we need to think not only of numbers in terms of representation, but also in terms of the culture created around difference. On screen, is diversity always a specialist topic or is it embedded in our programmes? Off screen and in the workplace, are you getting the best out of team members? Are they fully engaged? Are they bringing their true selves to their tasks and being allowed to add the value that naturally comes with being included?"

Miguela Gonzalez

Diversity & Inclusion Lead, Nations

Executive Committee Foreword

TIP Endorsement by the Executive Committee, demonstrating commitment from the highest levels

This is a diversity and inclusion plan that matches our ambition for better serving and representing our audiences all across the UK.

The new, bold commitments that make up this three-year DEI Plan are not only organisational ambitions, they are also personal commitments from each member of the Executive Committee.

Together with our Creative Diversity work—designed to provide greater diverse representation on-air, on-screen and across our productions—our workforce commitments outlined here will deliver the changes we need to build trust with our staff, tackle inequalities, role-model inclusive behaviours and address under-representation.

Our people help make the BBC such an important institution—for the UK and the world. It takes a vast array of skills, knowledge and experiences to keep us on-air, on-screen and relevant to our audiences.

We are building a BBC for all of us.

BBC Executive Committee

February 2021

Best Practice Example 2

Setting the tone for your overall approach to DEI



Policy Guidelines

TIP Reinforces DE&I as a key strategic pillar and business priority—“make DEI how we work every day” is a strong statement that sets high expectations

DIVERSITY, EQUITY & INCLUSION DEFINITION

Our definition of Diversity, Equity & Inclusion is *We All Belong*. A place where all of us have a responsibility to accelerate our progress, and where we all are accountable and empowered to drive change—here and in the world at large.

DEI VISION

Be yourself, change the world. Our vision at Johnson & Johnson is for every person to use their unique experiences, backgrounds and abilities together—to spark solutions that create a better, healthier world.

DEI MISSION: MAKE DEI HOW WE WORK EVERY DAY

Our mission is to make DEI our way of doing business. We will advance our culture of belonging where open hearts and minds combine to unleash the potential of the brilliant mix of people,

in every corner of Johnson & Johnson. We will create equity by tailoring tools and resources to meet individual needs, and by continuously improving our systems and processes so everyone has the opportunity to reach their full potential.

Diversity

Diversity is about each individual's unique perspective. It's about each of us, our colleagues and the world we care for—all backgrounds, beliefs and the entire range of human experience.

TIP Context as to what diversity, equity and inclusion means at the firm—offering their own **perspective and beliefs**

Equity

Equity is tailoring tools and resources to meet the unique needs of each individual and continuously improving our systems and processes, **so everyone has the opportunity to reach their full potential.**

Inclusion

Inclusion is creating a deep sense of belonging, where each individual is valued, each one's ideas are heard and everyone advances this culture for everyone.



TIP Turning written content into a **framework** such as this creates a nice **visual** that summarises the entire DEI strategy of the firm

Anti-Discrimination

Define what discrimination means for the firm



Background

- A key element of a firm's DEI strategy should be to eliminate any bias or discrimination that may occur due to any difference in characteristics or identities. In many countries, some of these characteristics and identities are protected by law, so your firm likely also has a legal obligation to take action to reinforce this.
- In an ideal world the contents of this section should go without saying, but that is unfortunately not yet the reality of the world we live in. Stating plainly the characteristics and forms of discrimination the firm wishes to protect against helps to clearly communicate to all employees and other stakeholders the expectations of individual conduct, so there can be no ambiguity.

Considerations

- Defining key terms is a vital starting point to any policy. Which protected characteristics and identities does your firm want to specify to ensure it is acting inclusively?
- Have you considered the opinions and voices of minority groups are being considered when defining discrimination?
- How can you ensure intersectionality between different minority groups is appreciated?
- What forms of bias and discrimination do you want to prevent? What processes and policies will you put in place to support that?

Guidance

- **PROTECTED CHARACTERISTICS:** Specify the protected characteristics and identifies covered by the policy. For example, this could include: age, disability, race, religious belief, gender, trans or non-binary identity, marital and civil partnership status, pregnancy or parental status, sexual orientation, socioeconomic background, and caring responsibilities.
- **FORMS OF DISCRIMINATION:** For the avoidance of doubt, define what constitutes discrimination at the firm and provide some explanation as to why. This For example, this could include:
 - **Direct discrimination:** treating someone less favourably than another due to a protected characteristic
 - **Indirect discrimination:** putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage
 - **Discrimination by association:** treating someone less favourably than another due to an individual's association with someone with a protected characteristic
 - **Discrimination by perception:** treating someone less favourably than another because they are thought to have protected characteristic, when they do not
 - **Victimisation:** treating someone unfavourably because they reported an incident of discrimination
 - **Bullying and harassment:** a repeated and intentional action designed to embarrass, intimidate or hurt someone either physically or emotionally, often involving an imbalance of power
 - **Microaggressions:** a subtle statement or action that communicates a hostile, derogatory, or negative attitude. Microaggressions are often considered unintentional but are nevertheless harmful.

Best Practice Example 3

Define what discrimination means for the firm



Policy Statement

TIP List of identities and characteristics protected against, as well as the forms of behaviour that would classify as anti-discriminatory

AT&T prohibits discrimination on the basis of race, color, religion, religious creed, national origin, ancestry, age, sex, sexual orientation, gender, gender identity, gender expression, physical disability, mental disability, pregnancy, medical condition, genetic information, marital status, citizenship status, military status, veteran status, or any other characteristic to the extent protected by federal, state,

or local laws. For instance, New York City also prohibits discrimination on the basis of creed. AT&T complies with these and other applicable EEO Laws and prohibits discrimination.

AT&T also strictly prohibits all forms of abusive conduct or workplace harassment, including sexual and racial harassment and harassment based on any of the characteristics described above. An employee's actions, words, or behavior must not create an intimidating, hostile, or offensive environment.

Employees are not permitted to ridicule, intimidate, threaten, demean, or bully other employees, customers, vendor employees, or any other individuals with whom they interact. Remarks, comments, jokes, slurs, images, gestures, messages, or social media posts of an offensive nature will not be tolerated.

It is a violation of this policy to discriminate against or harass anyone while working on behalf of AT&T, including co-workers, contractors, vendors, or customers.



Diversity and Inclusion

TIP Within the company's Code of Ethics, identifying anti-discrimination as a focus area. Demonstrates how the company will achieve zero discrimination

Respect for people is a core value of the Renault Group. In particular, it makes it possible to guarantee the dignity of people, non-discrimination, diversity, trust and quality of life at work.

Renault Group is committed to preventing all forms of discrimination and to promoting diversity and inclusion among all its employees.

As such, each of us undertakes in particular to:

- Promote diversity in the recruitment and selection of future employees.
- Promote inclusion at every step of working life.
- Treat everyone with dignity without favoritism and with respect for privacy.

ZERO DISCRIMINATION

Renault Group pays particular attention to the principle of non-discrimination. Discrimination is the unfavourable treatment of a person or group of persons on the basis of criteria unrelated to professional competence.

Grounds of discrimination may include gender, age, racial, ethnic, national, social, cultural origin, sexual orientations or gender identity, disability, physical appearance or health problems, political or religious opinions, trade union activities.

Discrimination can result in comments, decisions or behaviour that violate dignity and equality or that constitute intimidation or serious pressure. It can manifest itself in more or less visible forms and occur at any time of professional life.

On the other hand, incitement to discrimination and instruction to discriminate also constitute discrimination.

Renault Group's ZERO discrimination policy strongly condemns discrimination in all its forms and at any time of professional life.

Renault Group is asking each of us to:

- Do not practice any form of discrimination under penalty or punishment, in particular that which may result in the exclusion of a recruitment procedure or an appointment, access to an internship or training or create inequality in the career management of employees (salary, promotion, transfer...).

In order to eradicate all discrimination, Renault Group is committed to promoting employee training and awareness and ensuring enhanced communication, both on the Whistleblowing system (see chapter 5) and on discriminatory behaviour and measures.

In addition, as part of its ZERO discrimination policy, Renault Group has set up ZERO discrimination referents on all its sites.

Best Practice Example 4

Define what discrimination means for the firm



SIEMENS Gamesa

Prohibited conduct under this procedure

HARASSMENT

TIP Prevention of Harassment procedures are explicitly and **directly linked** to the Diversity, Equity and Inclusion policy

Harassment is a range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that is directed at, and is offensive to, another individual, and that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm.

Harassment (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) adversely affects an individual's employment opportunities.

TIP Comprehensive account of what behaviours would constitute harassment with the aim of eliminating those behaviours—many of which are associated with discrimination (such as negative stereotyping, or any behaviour that displays aversion to an individual or group)

Harassment may take different forms, including sexual harassment and abuse of authority. It may include slurs or negative stereotyping; threats, intimidation or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

For harassment to occur, it is not necessary that the offender actually intended the behavior to be offensive, humiliating or intimidating. In their interactions with others, employees should always consider the point of view of the other person in evaluating whether their conduct might be regarded as unacceptable under the present procedure.

Harassment is normally prolonged and persistent. However, in exceptional cases, a single incident can be considered harassment if it is so severe that it has a lasting negative impact on the individual(s) concerned.

Harassment can take many different forms and may include among others (non-exhaustive list):

- Unreasonable intrusion into a person's private life, such as unnecessarily seeking to communicate with that person outside office hours or when they are at home
- Abusing or threatening remarks, both oral and written
- Continual exclusion of a person or group from normal communication, work- or work-related social activities
- Belittling your staff's contributions and achievement
- Not allocating tasks corresponding to the job description
- Display of posters, pictures, electronic images or written materials which are offensive, obscene or objectionable
- Pressure, offensive behavior, even refusal to communicate
- Continual and unfounded refusal of leave application or training
- Isolating, setting apart, excluding, rejecting, ignoring, disparaging or humiliating
- Continual unjustified and unnecessary comments or deliberate insults related to a person's professional competence
- Offensive or degrading comments, particularly in public, bullying, antagonism

Some behaviors that do not necessarily constitute harassment under the terms of this procedure, nonetheless, be viewed as inappropriate in the work environment, and may be dealt with accordingly.

SEXUAL HARASSMENT

Sexual harassment is a sex-based behavior that is unwelcome and offensive to its recipient. It includes any unwelcome and unwanted sexual advance, request for sexual favors, or other unwelcome or unwanted written, verbal or physical conduct of a sexual nature.

Sexual harassment may take two forms:

- Quid Pro Quo, when a job benefit—such as a pay rise, a promotion, or even continued employment—is made conditional on the victim acceding to demands to engage in some form of sexual behavior; or,



- Hostile working environment in which the conduct creates conditions that are intimidating or humiliating for the victim.

Both male and female colleagues can either be the victim or offender. Sexual harassment may occur between persons of the opposite or same sex. Sexual harassment may also occur outside the workplace and/or outside working hours.

Depending on the circumstances, sexual harassment may include (non-exhaustive list): unwelcome advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; comments about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including via email); and any other physical, verbal or visual conduct of a sexual nature.

Abuse of authority

The abuse of authority is the improper use of a position of influence, power or authority against a person or a group.

Abuse of authority should not be confused with the usual performance by employees of their functions and duties, including the execution of managerial and supervisory responsibilities. This may include the provision of advice or counseling on work performance, attendance or other work-related behaviors in the context of performance management, which might comprise critical comments indicating areas in need of improvement. It may also include the taking or implementation of difficult decisions on work-related issues that may be the subject of disagreement, recognizing that the ability to express differences of opinion is a normal part of work.

Reasonable actions of this nature are not acts of harassment and are not dealt with under this procedure. Actions are considered reasonable if they are in line with the Company's Business Conduct Guidelines or generally accepted principles of managerial and supervisory duties and responsibilities.

However, these actions might appear to qualify as harassment if they are repetitive or systematic and carried out in a manner that is offensive, humiliating or embarrassing.

Discrimination

Discrimination is any distinction, exclusion or preference made on the basis of race, color, sex, religion, political opinion, national extraction or social origin (among other characteristics), which has the effect of nullifying or impairing equality of opportunity and treatment in employment or occupation.

Retaliation

TIP Definition of discrimination and the characteristics which are protected against under the policy

The Company prohibits retaliation against any individual who reports harassment or discriminatory conduct or participates in an investigation of a complaint. Retaliation against individuals for reporting an act of harassment or discrimination or participating in an investigation is a serious violation of this procedure and, as is the case with harassment or discrimination itself, will be subject to disciplinary action.

Equal Employment Opportunity

Providing equal opportunities to all



Background

- Equal employment opportunities go hand in hand with your firm's stance on anti-discrimination. Employment opportunities should NOT be affected by an individual's background, identity, or any other characteristic. This includes both negative and positive discrimination—for example by favouring candidates that attended the same university as you for a promotion.
- True commitment to DEI requires looking at the ways the firm treats its employees in terms of offering equal employment opportunities to all, rather than only focussing on 'quick fixes' that can yield tangible results over the short term.

Considerations

- Do our employees believe we are an equal employment opportunity firm?
- What are we currently doing/should we be doing to ensure opportunities are open to all?
- What are we currently doing/should we be doing to ensure bias or discrimination (positive or negative) does not impact workplace outcomes?
- Are we aware of any instances where the firm's hiring practices or promotions were affected by an individual's preferences?

Guidance

- **EQUAL OPPORTUNITY STATEMENT:** Firms will often disclose publicly on their website a brief statement asserting that they offer equal employment opportunities to all, regardless of any characteristic or identity. This statement may be a legal requirement depending on the firm's jurisdiction, so may contain references to applicable laws and regulations that must be complied with. Typically this statement will communicate the organization's commitment to preventing discrimination across hiring, promotion, compensation practices.
 - **Recommended reading:** US Equal Employment Opportunity Commission, [Know Your Rights: Workplace Discrimination is Illegal](#), European Commission [non-discrimination information](#)
- **EQUAL PAY FOR EQUAL WORK:** in order to advance pay equity, firms operating in certain countries that meet particular thresholds may now be required by law to report on gender pay gaps; that is, the difference between the amount an average male employee gets paid and an average female employee gets paid. The fundamental argument behind this is that equal work should demand equal pay. By looking into any discrepancies, you can begin to rectify any pay gaps your firm may have.
- **HIRING & PROMOTIONS:** your firm's stance on anti-discrimination extends to its internal practices too. Hiring and promotion decisions must be made on the basis of merit, ensuring that a prospective candidate or existing employee is neither advantaged nor disadvantaged by any characteristic or identity that individual may hold.

Best Practice Example 5

Providing equal opportunities to all



Equal opportunities policy

ENCOURAGING EQUALITY FOR EVERYONE

We are proud to be an equal opportunities employer and encourage diversity throughout the business. We work closely with other broadcasters, leading businesses and equal opportunity organisations to share information and promote best practice.

All of our policies embrace the principles of equal opportunity and our commitment to ensure that no member of staff or job applicant will be treated less favourably in a manner which conflicts with the provisions of any relevant equality legislation. Equality legislation recognises a number of protected characteristics: Age, Disability, Gender identity or expression, Marriage and Civil Partnership, Pregnancy & Maternity, Race (including the Irish Traveller Community), Religion & Belief, Political Opinion (legislatively recognised in Northern Ireland only), Sex and Sexual Orientation. ITV also includes parental status within the above grouping. ITV will not tolerate unlawful discrimination based on any of these protected characteristics.

TIP Sets out the **protected characteristics** as defined by law, and those selected by the company

We recognise the value of involving everyone in the promotion of equal opportunities and diversity, and each business has its own Ambassador for consultation and information via elected representatives. We also have a number of internal networks to support and promote different groups (e.g. ITV Pride, Women's Network). It is our firm commitment that no part of our business should use forced labour or child labour, and we are guided by this principle in establishing relationships with suppliers. The specific exception to this is when we engage child performers to work on our programmes and in this event we comply with the strict regulations in place across the industry.

Equal Opportunities shall apply in all conditions of work including pay, hours of work, holiday entitlement, sick pay,

maternity/paternity entitlement, pensions, recruitment, selection, training, promotion, shift work, and work allocation.

TIP Asserting exactly what aspects of the workplace equal opportunity shall apply to—in this case, "all conditions of work"

We monitor the composition of our workforce and may take lawful positive action if it appears that the effectiveness of this policy can be improved.

All colleagues have a responsibility for good equal opportunities practices within the organisation, treating each other with dignity and respect and for challenging any behaviour which might be regarded as unfair or discriminatory. Line managers are specifically responsible for ensuring the fair treatment of all individuals within their department, with particular reference to recruitment, selection, training and development opportunities and work allocation.

TIP Placing responsibility upon all employees to support equality in the workplace

Positive action

Positive discrimination is not lawful in the United Kingdom. However, where we reasonably think that persons with a particular protected characteristic are disadvantaged or have different needs, or that their participation in an activity is disproportionately low, we can take lawful positive action to try and reduce that disadvantage, address the particular needs or to increase participation in the activity.

The composition of the workforce and of job applicants will be monitored on a regular basis. Should inequalities become apparent then, as far as practical, lawful positive action will be taken to redress the imbalance. Examples of the type of action we could take includes: training opportunities and encouragement of people of underrepresented groups.

TIP Positive action in an attempt to **tackle systemic inequalities**

These actions will not positively discriminate and any recruitment selection decisions will be based on the candidate's skills and experience.



Discriminatory conduct

ITV will not tolerate discriminatory behaviour by any of its employees, or any other person providing services (such as freelancers or contractors).

Any colleague who subjects another colleague, agency worker, contractor or applicant to unlawful discriminatory treatment of any kind, may be subject to action under the Disciplinary Policy.

TIP Clarifying what **action** the company will take if equal opportunities are not upheld

Where an act of deliberate discrimination is proven, such behaviour may be considered gross misconduct and could result in summary dismissal.

In the case of a third party, such as a freelancer, subjecting a colleague or any other person working for or providing services to ITV, to unfavourable treatment, we will also take appropriate action.

If you believe you have been treated unfavourably on grounds of your sex, marital or civil partnership status, parental status, race, religion or belief, political opinion, disability, age, sexual orientation, or gender identity or expression, please discuss it with your manager in the first instance. Alternatively, please contact a member of the HR team.

Best Practice Example 6

Providing equal opportunities to all



accenture

How we foster a culture of equality

WE ARE COMMITTED TO EQUAL PAY FOR EQUAL WORK

TIP Committing to **equal pay for equal work** for all employees regardless of gender, race and ethnicity, demonstrating 100% compliance with this goal.

At Accenture, pay equity means that our people receive pay that is fair and consistent when considering similarity of work, location and tenure at career level. We conduct an annual pay equity review, and our last review was conducted in November 2021. As of November 5, 2021, we have dollar-for-dollar, 100% pay equity for women compared to men, in every country where we operate (countries with de minimis headcount were excluded from the analysis). By race and ethnicity, we likewise have dollar-for-dollar, 100% pay equity in countries where we collect this data (the United States, United Kingdom and South Africa).

What we believe

Accenture's purpose is to deliver on the promise of technology and human ingenuity and our commitment to our people, clients and communities is to accelerate equality for

all. Our purpose and our commitment drives our innovation agenda, helps us deliver 360 value, and ensures we act as a responsible business leader.

TIP Linking the company's **purpose and product/service offering** to equality, and explaining beliefs as to how this is a driver of value for the company.

It enables us to attract, develop, inspire and reward top talent. And it creates an environment that unleashes innovation, allows our people to perform at their very best and underpins a culture in which everyone feels they have an equal opportunity to belong and build a career.

TIP Reaffirming that this **commitment comes from the very top** of the company—from its CEO and Board of Directors.

This commitment starts at the top with our chair and chief executive officer and Board. And we expect leaders at all levels to help create and sustain a culture of equality, where everyone can advance and thrive. Our areas of focus include gender, ethnicity, LGBTIQ+, religion, persons with disabilities and cross-cultural diversity.

Reporting & Accountability

Establishing mechanisms to tackle discrimination or bias



Background

- Once we have defined—in the previous anti-discrimination section—what we are trying to protect individuals from, we must establish mechanisms for holding those who commit such offences accountable, through reporting channels and a clearly defined procedure to be followed in the case of internal investigations.
- It is important to note that the mechanisms for holding individuals accountable must be fair and just to all parties, both the accused, the accuser, and (where different) the individual against whom the bias or discrimination occurred.

Considerations

- Are you able to offer multiple reporting channels, of which at least one is anonymous?
- Could you consider asking external counsel for advice on the most appropriate channels for your size of business and working style?
- How can you ensure employees are aware of all channels available to them?
- How can you ensure that, once an employee reports a complaint, that all parties are protected?

Guidance

- **REPORTING CHANNELS:** channels for reporting incidents should be:
 - Set up in an anonymous, accessible way
 - Of varying formats
 - Include some examples of channels, e.g. a special email address set up for reporting incidents
- **COMMUNICATION:** it is important that:
 - All employees are encouraged to take responsibility for tackling bias and discrimination
 - Channels should therefore be communicated clearly so all staff are fully aware of where to go when they witness, or are victims of, discrimination
 - All employees should be encouraged to report their concerns—as it is better to report and be investigated (but wrong) than to stay silent.
- **INVESTIGATIVE PROCESS:** it is important that:
 - The process is formal, impartial, and treated as a fact-finding exercise
 - The process should be formally documented and transparent throughout, with the correct controls in place to protect the privacy and best interests of the people involved
 - Those accused of bias or discrimination have a right to appeal the result of the investigation
- **OUTCOMES:** the outcome of the case should be taken seriously. Depending on the severity (and if not already engaged) it would be prudent to employ legal counsel to discuss the appropriate next steps—whether that be a written warning for something less serious, suspension with pay for something that shows a pattern of behaviour, or in more extreme cases, firing
- **REMEDIAL ACTION:** as a growth stage business it is important to reflect upon policies and processes to understand if anything can be changed in future, to prevent bias/discrimination occurring again. Consider putting together a group for a retroactive investigation into the processes and channels used.

Best Practice Example 7

Establishing mechanisms to tackle discrimination or bias



SCOPE

Procedure

BREACHES

We take any breach of this policy very seriously. Some breaches may break the Law. We take clear and strong action to manage breaches.

For colleagues, this will be guided by our Anti-harassment and Bullying policy and our Disciplinary Procedure. If you are found to have breached this policy, we will deal with this matter as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

For volunteers, breaching this policy could result in the volunteering agreement ending and them being asked to leave their volunteer position. It may also mean the volunteer is not able to volunteer in future.

For Trustees, breaches of this policy will follow the guidance the Code of Conduct.

For members, breaches of this policy will be guided by the members' Code of Conduct.

REPORTING INAPPROPRIATE BEHAVIOUR

It is your responsibility to report any inappropriate behaviour which may go against this policy. We will support you to raise concerns.

TIP Actively encouraging employees to report incidents of possible bias or discrimination, and highlighting personal responsibility

We don't expect colleagues, volunteers, Trustees and members to be experts on different types of discrimination. And we know you might not always be certain someone's behaviour has breached this policy.

The most important thing is to never ignore any inappropriate behaviour. Inappropriate behaviour can also take the form of lots of seemingly small incidents. If you notice inappropriate behaviour from anyone involved with Scope, we encourage you to take action if you feel safe to do so.

REPORTING ROUTES

There are several ways to report an incident of discrimination. That might be something that has happened to you or something you have seen happening to someone else.

Colleagues

Option 1: Report the incident to your line manager

Option 2: Report the incident directly to HR by emailing Employee Relations

Option 3: Use our anonymous reporting tool to report the incident

You can find also more about how to report incidents in the Anti-Harassment and Bullying at Work policy.

It will usually be your choice whether you want us to investigate the incident or not. There might be some cases where we need to investigate the incident to protect you or other colleagues.

If you use our anonymous reporting route, we won't usually be able to investigate the incident. But it's still helpful for us to know about incidents that are happening. This data will help inform the work we do to make things better.

TIP Providing multiple options for reporting discrimination can help to encourage reporting of incidents, especially the use of an anonymous channel

INVESTIGATION PROCEDURE

Any investigation will be carried out by someone with the right experience. That person won't have had any involvement in the incident before the investigation. The investigation must be thorough, impartial and sensitive.

You will be given a provisional timetable for the investigation.

TIP Clearly sets out a structured approach for handling any instance of reported bias or discrimination, providing clarity to all parties as to the investigative process



We will arrange a meeting with you as a first step. This will usually be done by your line manager, or equivalent if you are a volunteer, member or trustee. If your line manager is involved in the incident, the meeting might be arranged by another appropriate person, for example a senior manager.

That meeting will usually be arranged within one week of receiving your complaint. At the meeting you will give your account of the events. You have the right to be accompanied by a colleague or a trade union representative of your choice. They must respect the confidentiality of the investigation. You will be asked if you require any adjustments for the meeting.

The investigator will arrange further meetings with you as needed throughout the investigation.

WHAT ACTION SCOPE WILL TAKE

If the senior manager decides that discrimination has taken place, we will act quickly to address it. If it is another colleague that has been discriminatory, we will deal with the matter as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

Where the perpetrator is a third party, customer, agency worker, contractor, supplier, volunteer or visitor, appropriate action might include:

- putting up posters explaining what behaviour is acceptable and unacceptable
- speaking or writing to the person or their manager about their behaviour
- banning them from the premises
- terminating a contract with them

TIP Providing an overview of possible **disciplinary actions** the firm may take where bias or discrimination has been determined to have occurred

For volunteers, breaching this policy could result in the volunteering agreement ending and them being asked to leave their volunteer position. It may also mean the volunteer is not able to volunteer in future.

For Trustees, breaches of this policy will follow the guidance in the Code of Conduct.

For members, breaches of this policy will be guided by the members' Code of Conduct.

APPEALS

If you are not satisfied with the outcome, you can appeal in writing to a more senior manager. You need to state your full grounds of appeal. You need to do that within 1 week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within 1 week of receiving your written appeal. This will be dealt with impartially by a manager who has not previously been involved in the case. They might ask anyone previously involved to be present.

You can bring a colleague or trade union representative to the meeting. You will be asked if you require any adjustments for the meeting.

We will confirm our final decision in writing, usually within 1 week of the appeal hearing. This is the end of the procedure and there is no further appeal.

TIP Including an **appeal process** for instances where a party to an investigation may not be satisfied with the outcome— including **escalating the matter** to a more senior manager

Governance

Putting governance structures in place to help deliver on DEI strategy



Background

- Without the proper governance structures in place, your DEI policy cannot be implemented effectively. In the best case scenario, your DEI policy will simply be a marketing document, and in the worst case scenario, it could be considered greenwashing. That being said, it is important to establish who within your company will be involved in and accountable for driving progress against the firm's DEI strategy.
- Keeping DEI high on the agenda will typically require buy in and oversight from the senior executives of your firm. This looks good from an external stakeholder perspective, but it also communicates to employees that this is an important topic for the firm's leadership, which should help to encourage participation from the wider employee base

Considerations

- Who do we think should be involved in the firm's DEI strategy, and why?
- How do we reflect the diversity of our employee base? How can we ensure all voices are being heard?
- How can we encourage all employees to engage on DEI?
- Are there any individuals within the firm who are passionate about DEI? How can we harness that passion for the firm's benefit?
- Does long term strategy include a commitment to having a diverse senior leadership team?
- How can you incentivise employees to contribute to the DEI goals of the company?

Guidance

- DEI OFFICER:** Determine who will be accountable for the overall implementation of the DEI policy and advancing the firm's progress towards its vision. Ideally this will be a senior executive or other member of staff with an appropriate or relevant position. From a practical standpoint, it would make sense to be the same individual with ownership of the DEI policy project. For best practice, your firm could create a 'Chief Diversity Officer' position.
- DEI COMMITTEE:** consider establishing a DEI committee. As above, it may make sense to involve at least some of the individuals who contributed to the DEI policy project, as they will hopefully be more invested in the policy's implementation having been involved in its production. Likewise, this committee should be comprised of individuals from diverse backgrounds (to the extent that this is practical) and from different business units. At least one member of senior management should have oversight. More ambitious firms or those with significant workload in relation to DEI may want their committee to meet on a monthly basis, though quarterly should be sufficient.
- DEI CHAMPIONS:** DEI champions may be used by firms with many different teams under each high-level business unit. While not involved in the decision-making or implementation process, they can be used to ensure that each team has at least one member who is proactively considering how DEI affects that team, and can update the rest of the team on the firm's DEI activity.
- LINK TO PERFORMANCE:** for those involved in the DEI committee, consider making progress against the firm's DEI goals a part of annual performance assessments. For best practice, variable compensation package could also be linked to DEI.
- LEADERSHIP:** make a commitment to improve the diversity of the firm's senior management and board of directors. This does not mean hiring and firing, but reflecting on how you can improve diversity of thought in the firm's leadership team.
- REVIEW:** acknowledge that the DEI policy is a live document that will evolve and be updated over time

Best Practice Example 8

Putting governance structures in place to help deliver on DEI strategy



Morgan Stanley

Governance and Accountability

Ownership and responsibility for diversity and inclusion at Morgan Stanley starts at the top. Our leadership drives inclusion and belonging within their organizations by championing our strategy and personal accountability.

We rely on deeply embedded governance and accountability measures to guide our strategy and advance our efforts.

TIP Summarising ultimate ownership and responsibility for DEI at the company

LEADERSHIP ACCOUNTABILITY AND ENGAGEMENT: Senior leadership, including our Chairman and CEO, and our Board of Directors, is actively involved in diversity and inclusion efforts both Firmwide and in each division. They shape strategies to improve representation, support the retention and advancement of underrepresented employees, and foster inclusion and belonging.

GLOBAL DIVERSITY AND INCLUSION TEAM: Our global Diversity and Inclusion team and our Human Resources Business partners provide advisory and programmatic support to leaders across the Firm. The teams build and deploy solutions to advance our diversity and inclusion strategy, maintain a continuous dialogue with key stakeholders and monitor our endeavors to ensure effectiveness.

DIVERSITY COUNCILS: Diversity Councils representing all levels of the organization help advance our objectives and champion a global culture of inclusion and belonging. Every business and region has an active council that helps leaders design strategies and solutions to address their needs and the needs of their employees.

DIVERSITY REVIEWS: Firmwide divisional and regional diversity reviews are conducted each year and are attended by Firm leaders, our Human Resources leadership team and our Global Diversity and Inclusion team. Through these reviews, we evaluate and track each division's efforts, commitments and actions. Additionally, our leaders regularly meet with our Board of Directors to discuss our efforts, progress and ongoing challenges.

TIP Summary of governance structures and an overview of their roles in implementing DEI strategy, e.g. leadership to shape the strategy, DEI team to advise and support leaders

Meet the Advisory Board

CHAIR	ADVISORY BOARD		
JAMES P. GORMAN Chairman and CEO, Morgan Stanley	JOSÉ CALDERÓN Former President & CEO, Hispanic Federation	LANAYA IRVIN President, Coqual (Formerly Center for Talent Innovation)	PERRY M. TRAQUINA Former Chairman and CEO, Wellington Mgmt.
DIRECTOR	GEOFFREY CANADA President, Harlem Children's Zone	GITA JOHAR Meyer Feldberg Professor of Business and Vice Dean for DE&I, Columbia Business School	RAYFORD WILKINS Former CEO, Diversified Businesses of AT&T
DEI advisory board of external professionals—comprised of a diverse and experienced group of Consultants, Lawyers, Charity Directors and Investment Professionals CEO is the chair of DEI advisory board	ELIZABETH CORLEY Former CEO, Allianz Global Investor	SIMONE MAREAN Co-Founder & Co-CEO, Girls Leadership	KENJI YOSHINO Director of Center for Diversity, Inclusion & Belonging, NYU School of Law
	VIVIAN HUNT Senior Partner, McKinsey & Company	COLONEL RICH MORALES Army Officer & Professor, United States Military Academy, West Point	

Source: Morgan Stanley's DEI advisory board [link](#)

Best Practice Example 9

Putting governance structures in place to help deliver on DEI strategy



The implementation of our DEI strategy involves several different bodies and stakeholders, working hand in hand with the global DEI team.

TIP Several layers of governance including:

- DE&I Board
- Global DE&I Strategy team
- Local DE&I champions

Voluntary Employee Resource Network Groups

While this structure is fairly complex, it is an example of a **multi-layered** approach which gives all employees a chance to engage, regardless of seniority and across regions.

- **DEI BOARD:** A global group of top leaders representing our different businesses and zones of operations, the DEI Board acts as a sounding board for the global DEI strategy and its members commit to be DEI champions and advocates. The board is gender-balanced and sponsored by three Executive Committee members.
- **HUMAN RESOURCES (HR) COMMITTEE:** The committee includes the CHRO as well as all HR heads of operations, businesses, and global functions. They act as a sounding board and champions of our global DEI strategy and actions. Members of the HR Committee set DEI ambitions, and drive investment and delivery of local action plans to enable local country, regional and entity teams' contribution to the Company's global DEI ambition. HR Committee members ensure geographical and entity DEI Leaders are in place to achieve desired outcomes.
- **GLOBAL DEI TEAM:** The Global DEI team defines the strategy and is accountable to deliver on our DEI transformation, working with the DEI network and reporting to both the DEI Board and Human Resources Committee. The team works in close collaboration with the HR Center of Excellences (Talent Acquisition, Talent Management, Learning and Rewards), Global Sustainability, Internal communications, and Marketing and Employer Branding teams, as well as with the broader HR and Communication ecosystem.
- **LOCAL AND ENTITY DEI LEADERS:** DEI leaders and ambassadors are responsible to develop and deliver local, regional and entity DEI action plans and change management that meets local regulations and addresses country-specific situations. They are appointed by HR Committee members and are responsible to partner with local HR teams, HR Center of Excellences (Talent Acquisition, Talent Management, Rewards), Internal communications, and Employer Branding to animate local action plans in support of the global strategy. As a member of the global DEI network, these leaders and ambassadors convene bi-monthly to share best practices and address common challenges.
- **EMPLOYEE RESOURCE NETWORKS (ERNS):** ERNs are groups of employees with similar backgrounds, experiences, characteristics and/or who share a characteristic, a passion or interest and convene to discuss and advance a particular agenda. ERNs are employee driven, voluntary, and open to all employees. ERNs are established globally and locally. Among others, Schneider Electric has ERNs focused on women, emerging professionals, Black professionals, and LGBT+ inclusion. ERNs are crucial in delivering transformation from the bottom-up.
- **HR CENTERS OF EXCELLENCE (COES)** Global and local Talent Acquisition, Talent Management, Rewards, and Learning teams are responsible and accountable to apply Inclusion and Care by design at all stages of the Total Employee Experience. These policy, system, and process owners are expected to ensure fairness in global and local people processes and policies, and fostering a culture of inclusion and care at all levels of the organization.

Recruitment

How to attract (and retain) a diverse pool of candidates



Background

- Incorporating DEI into recruitment practices can be effective in improving employee diversity metrics, but must be incorporated throughout the entire recruitment process all the way from writing and advertising job descriptions, to the ultimate hiring decision.
- The first goal should be to attract a larger and wider pool of diverse applicants by appealing the individuals from different backgrounds, and those with diverse characteristics and identities. Without this, your company will be limited in its hiring choices. Starting from this baseline will set the rest of your company's process up for success.

Considerations

- What policies can the firm put in place to eliminate conscious or unconscious bias in its hiring practices?
- Are job descriptions reflecting the firm's DEI ambitions?
- How can the firm position itself to be attractive to candidates from all backgrounds and identities?
- What actions can be taken to improve candidate diversity over the short, medium and long term?
- Is the application process inclusive and considerate of accessibility requirements?

Guidance

RECRUITMENT PROCESS – making adjustments to the existing recruitment process to eliminate bias, and encouraging hiring individuals from diverse backgrounds, for example through:

- Ensuring language in job descriptions is presented in an inclusive way so as not to deter individuals with particular identities or characteristics from applying
- Conducting a 'blind' recruitment process where information that could imply a certain cultural or religious background is removed in an attempt to eliminate unconscious bias
- Clearly communicating in job descriptions and throughout the hiring process that the company is an equal opportunity employer and is committed to DEI
- Eliminating the practice of preferring candidates that attended specific schools or colleges. (Example: Deloitte's 'contextualised recruitment')
- Providing training and education to employees who are involved in making hiring decisions on DEI topics
- Partnering with DEI recruitment experts (Example: EmployAbility DEI consultants offer a range of services, including recruitment process audit)

JOB OPPORTUNITIES – creating job opportunities that are specifically designed to attract or accommodate particular groups of individuals, for example through:

- Offering alternative points of entry (e.g. internships, apprenticeships) for individuals who may have been at a disadvantage for consideration if they had gone through the traditional hiring process, for example due to not graduating college or university.
- Actively counteracting disadvantages by participating in outreach programmes (e.g. insight days) that target specific groups, for example tackling socioeconomic disadvantages by offering insight days for individuals from schools whose pupils tend to come from underprivileged backgrounds, or by offering "returnships" for those who took an extended career break.
- Creating opportunities which are only open to individuals with particular characteristics or identities, for example allocating opportunities to those from typically underrepresented backgrounds

Best Practice Example 10

How to attract a diverse pool of candidates



Hiring

WE GREW THE SKILL OF OUR RECRUITERS TO BUILD MORE REPRESENTATIVE TEAMS.

To build a workforce that truly reflects the world, we must prioritize inclusion from the very first outreach.

To that end, we scaled the expertise of high-impact teams like Empower, which specializes in recruiting underrepresented talent for technical and non-technical roles. Empower reached across our entire recruiting ecosystem, training 200 Google recruiters in a range of product areas to become trusted advocates for diverse talent—exceeding all year-over-year goals. In turn, participating recruiters brought key learnings, trends, and qualitative data back to the broader recruiting team.

TIP Specialist recruitment teams that are dedicated to recruiting diverse talent & leveraging internal employee resource groups

We also launched community-specific educational programs, like our new global e-learning, which aims to equip hiring managers to better assess candidates with disabilities or neurodivergence. Created in partnership with the Disability Alliance Employee Resource Group, this program helps hiring decision-makers address their biases and adopt more inclusive behaviors—whether around communication etiquette, job descriptions, or interview approaches. Based on its impact, we made the program available to all Google employees.

WE BUILT INCLUSIVITY INTO OUR JOB POSTINGS WORLDWIDE.

TIP Designing job postings around inclusivity to encourage applicants from more diverse backgrounds to apply.

How we present our open roles—and who finds them—can determine whether a candidate feels empowered to apply or not. That's why we manually reviewed over 5,000 job postings across Europe, Africa, and the Middle East, with the goal of increasing representation of women, Black talent, and people with disabilities. During the review process, we reduced bias in content and wording for job titles, requirements, and responsibilities. We also partnered with external hiring platforms to reach more Black talent. And we examined case studies across the region to uncover new ways to attract underrepresented groups. We extended that work to Brazil, where we posted roles exclusively available to the Black community across Tech, Cloud, and our business and sales teams, to help us reach undiscovered talent in South America's most populous country.

Best Practice Example 11

How to attract a diverse pool of candidates



Apprentice Scheme

This is an exciting opportunity to join a fast paced, dynamic organisation with a strategy to double in size by 2025.

We currently have in excess of 60 Apprentices in varying positions throughout our organisation including Mechanical Engineers, Marketing, Finance, Network Operations and People & Talent to name but a few.

We continue to identify, recruit and develop Apprentices who are able to show our DNA which incorporates Hard Work, Flexibility, Respect, Accountability, Honesty, and Passion

During your Apprenticeship you will be provided with opportunities to develop your knowledge and skills through vocational qualifications while at the same time contribute to the team you are placed in.

To be part of this exciting opportunity you will need to show our DNA and be 'amazing' everyday. We offer significant career and personal development opportunities, supported by structured training. Starting with our excellent induction programme to familiarise yourself with our organisation, then at approximately 3 months your apprenticeship will begin incorporating whichever qualification is required for you to learn and develop the skills you will need to succeed.

TIP Apprenticeships offered, helping to provide **alternative routes of entry** for non-university or college graduates.

Inspire

DPD delivers inclusion through the 'Inspire' programme by providing Work Experience, Supported Internships, Inclusive Apprenticeships, and Employment for people with learning difficulties and disabilities. Working with government, local schools, colleges, and charities to inspire a new way of thinking and proactively provide opportunities for all.

As a Disability Confident Employer and a Valuable 500 committed company, DPD looks to create further opportunities ensuring every area of the business is included in this part of our inclusion strategy:

Source: DPD's careers information: [here](#)

TIP Setting targets for learning difficulty/disability representation in the workforce, and offering an inclusive apprenticeship scheme specifically targeting those individuals

"Our vision is to have at least one disabled person, including those with learning difficulties and special needs, working in each area of the business with the goal of offering them full-time employment, in a meaningful role that adds value to the individual, DPD and society as a whole through structured Work Experience, Internship and Apprenticeship opportunities."

Supported Internships

TIP Internships for individuals with special educational needs and disabilities (SEND) through partnerships with local schools

At DPD we have acted as a host employer for young people with SEND on Supported Internships since 2018.

Supported Internships are a structured study programme that enable young people with an Education, Health and Care plan to achieve sustainable paid employment.

We partner with local schools, colleges and local authorities to offer placements throughout the business to equip young people with the skills they need for work, through learning in the workplace.

Inclusive Apprenticeship

Inclusive apprenticeships have been designed for individuals who have a recognised learning difficulty and/or disability and have a Health and Care (EHC) Plan.

Our Supported Employment team works with the Apprentice, their manager and a provider to ensure that all the appropriate reasonable adjustments are made to ensure the Apprentice can have a successful start to their career with DPD.

Best Practice Example 12

How to attract a diverse pool of candidates



People

We are focused on developing, engaging, and retaining a diverse workforce and leadership team because the more our workforce reflects the diversity of our consumers worldwide, the better and more authentically we are able to serve those consumers.

TIP Reaffirms commitment to diverse talent acquisition and explains why—because they believe a workforce reflecting their customers are able to serve those customers better

Talent Acquisition

Disney takes a meaningful and measurable approach to expanding our pipeline of wide-ranging talent, and we take care to follow industry best practices, including marketing roles on platforms that reach broad audiences; using respectful, welcoming language in our job descriptions; and forming inclusive panels to interview candidates. We also offer optional training to support leaders in identifying, attracting, and engaging a multifaceted talent pool.

CREATING OPPORTUNITIES FOR HBCU ALUMNI

Now in its second year, Disney on the Yard continues to build a community for alumni from Historically Black Colleges and Universities (HBCUs) and provide meaningful opportunities for HBCU students who dream of one day working in the entertainment field. The program builds on Disney's support of HBCUs through scholarships and engagement with students, faculty, and alumni. Focused on building a robust, long-term pipeline of Black talent, in fiscal 2022 Disney on the Yard launched an inaugural summer program in which students from HBCUs received unique on-the-job experience with Disney.

ATTRACTING DIVERSE TECH TALENT

Disney is working to attract wide-ranging talent to our technology teams. We are proud supporter of The Grace Hopper Celebration of Women in Computing, the world's largest gathering of women and nonbinary people in

technology. In fiscal 2022, we supported the conference, both in-person and virtually, as a top-tier Emerald sponsor with more than 300 Disney representatives attending. Since 2020, Disney has also participated in AfroTech, an annual gathering of technologists focused on celebrating Black and African American community, culture, and innovation. These conferences, and many others, enable Disney to engage with prospective talent and share innovations and content from across the Company.

TIP Targeted recruitment programmes to attract candidates from under-represented backgrounds in particular fields e.g. from historically black colleges and universities (HBCUs), Latinx in Animation

BREAKING BARRIERS TO ENTRY

In fiscal 2022, Disney's Lucasfilm launched the Get in the Door initiative, which offers a robust website and documentary video series showcasing various Disney career opportunities and how to build a rewarding career in the industry. The initiative encourages talent from underrepresented backgrounds to explore careers in entertainment production. It reaches a broad cross-section of audiences, allowing them to see themselves in these roles through a wide network of social platforms, presentations, and recruitment avenues.

DEVELOPING DIVERSE TALENT IN ANIMATION

The Walt Disney Studios supports the professional development initiatives of LatinX in Animation (LXiA), a signature program of the Latino Film Institute, by hosting talks to inspire artists in their own work and facilitating networking and hiring opportunities for LXiA members. LXiA is dedicated to uniting a talented pool of diverse innovators across the animation, visual effects, and gaming industries. Through our collaboration, talented groups of Latino creators are empowered to craft exceptional stories across multiple platforms and help bring valuable perspectives to our talent pipeline.



IBM Tech Re-Entry is a full-time, paid returnship program for technical professionals who took a break from the workforce, for one or more years, and are looking to restart their careers.

TIP *Return to work scheme* to encourage those who may have had a career break to enter back into the workforce

Returning professionals can refresh their skills with prescriptive learning plans and work on real-world, high impact projects. Participants have access to the latest

tools and technologies available and work alongside multi-disciplinary teams to hone their expertise and deliver on client-critical solutions.

The program fosters an inclusive and collaborative environment where individuals looking to restart their tech careers feel empowered and confident, with the goal of returning to IBM full-time after graduating.

Best Practice Example 13

How to attract a diverse pool of candidates



Policy on the Recruitment of Ex-Offenders

Diversity includes. Inclusion empowers. And when we bring everybody in, we can do the best work of our lives together. That's why we continue to strengthen our long-standing commitment to efforts such as inclusive hiring and development and equitable pay for all.

TIP Opening recruitment opportunities up to those who are typically overlooked in recruitment and providing context as to how this relates to inclusivity. More commonly, criminal records would result in losing candidacy for a job role.

Apple recognises that each employee contributes a wealth of perspectives to our culture. We seek to tap into this extraordinary resource and incorporate it into how we do business with our customers and communities. At Apple, we do not discriminate on the basis of any protected characteristics such as (but not limited to) gender, race, ethnic group, disability, or religion when recruiting, hiring, and promoting.

We welcome applications from a wide range of candidates, including those with criminal records. We treat all applicants fairly and do not discriminate unlawfully against the subject of a disclosure on the basis of conviction or other information revealed.



40,000+ Veterans and military spouses hired since 2013

- **500 HIRING FAIRS ATTENDED ACROSS NATION** – supporting transitioning service members, Veterans and military spouses.
- **14 EMPLOYMENT SUMMITS SPONSORED** – with Hiring Our Heroes in support of their 100k Military Spouse Hiring initiative.

HIRING OUR HEROES

80 hrs. Military Service Pay

Is a benefit that provides eligible U.S. partners (employees) with 80 hours of pay each year when National Guard or Reserve service obligations take them away from their work with the company.

TIP Employment support and opportunities dedicated to those who have served in the military and their families. Proactively targeting this group through participation in employment fairs and events, and a partnership with the Hiring our Heroes programme

Training & Education

Empowering all employees to take DEI into their own hands



Background

- Providing training around diversity, equity and inclusion topics is a great way to reinforce your firm's overall DEI strategy; it strengthens the message that DEI is something your firm takes seriously, and it can help to tackle bias and discrimination—conscious or unconscious—by bringing employees' attention to the ways in which this can occur, and what action they can take to prevent it.
- Training and education can take many forms. It can target certain groups of individuals (e.g. management teams) or can be tailored to the audience in question. Most importantly, the most effective DEI training will be both informative and actionable.

Considerations

- What baseline do we want all employees to meet?
- Are there any groups of individuals who require more DEI training? Why?
- What topics are most important to our business?
- How can training and education support our DEI strategy and vision?
- What mode of delivery would have the most impact? What mode of delivery is the most accessible?
- How often should DEI training take place?

Guidance

- **SUPPORT FOR UNDER-REPRESENTED GROUPS:** groups which may be under-represented within your firm when compared to the wider communities your firm operates in, may benefit from targeted training and educational opportunities to support their career development. For example, through a Diverse Leaders training programme that aims to support career growth and opportunities for high-performing, high-potential candidates from diverse backgrounds
- **UNCONSCIOUS BIAS TRAINING:** unconscious bias training is a popular type of DEI training which seeks to raise awareness of the judgements we unconsciously make based on a person's characteristics or identity, and how that affects our actions. The evidence on its effectiveness, however, is mixed.
 - **Recommended Reading:** Behavioural Insights Team, 'Unconscious bias and diversity training—what the evidence says', 2020 ([link here](#))
- **DEI LEADERSHIP TRAINING:** providing formal, assessed training for the individual(s) responsible for implementing your DEI strategy to encourage their leadership on the topic. For example, an online course for working professionals such as the Harvard University Equity, Diversity, Inclusion, and Belonging Leadership Certificate.
- **MODE OF DELIVERY:** delivery of DEI training and education is most likely to take place online through an existing training platform, and can be either developed in-house (typically where one or more DEI topics represent individual modules within a larger library of training and educational content) or outsourced through an existing DEI training provider. You could also consider inviting subject matter experts to deliver seminars / host workshops on particular topics for a more interactive approach.
- **RESOURCES:** your firm could provide employees with a library of DEI-related content as a source of unstructured DEI education

Best Practice Example 14

Empowering all employees to take DEI into their own hands



S&P Global

Eskalera DEI Learning Experience

In 2022, we expanded access to Eskalera, a DEI learning and development platform, to more of our S&P Global colleagues. Eskalera is an interactive tool for detailed skill building and practice through self-paced microlearning. Content covers topics such as authenticity, empathetic listening, allyship and psychological safety. We aim to equip people with the tools needed to experience ongoing success through knowledge, skills development, increased connection and meaningful insights.

TIP In-house employee training platform for self-paced learning on a variety of inclusion topics

The learning journey focuses on fostering skills that are key for building inclusive environments, as well as increasing career success and job satisfaction. When colleagues feel heard, confidence and trust increases. In addition, we further support the learning experience and enable opportunities to form meaningful connections and dialogue through learning circles.

As we continue to roll out Eskalera across the organization, we look forward to surfacing and sharing analytical insights about the markers of growth.

Effective Interview Skills Learning

We strive to ensure that our hiring managers and interviewers are supported when making hiring decisions, especially with diverse candidates.

TIP Targeted DEI training specifically relating to hiring practices

Research suggests that conducting a structured interview is critical to addressing bias in the hiring process. Having clearly defined job specifications allows the interview team to make more accurate hiring decisions by evaluating skills needed for long-term success in the role.

Additionally, aligning on these skills eliminates common evaluation pitfalls—such as “culture fit” or “like me” biases. To better support the sourcing and selection process, in 2022, we launched our Effective Interview Skills training.

The training, intended for hiring managers, focuses on the following themes:

- Creating a structured interview process.
- Defining clear job specifications and using inclusive language.
- Ensuring all candidates are asked the same set of questions.



paradigm
Reach

Paradigm Reach is a modern and interactive eLearning solution that delivers impactful diversity, equity, and inclusion training to any employee, anywhere, anytime.

On-Demand Access to the World's Leading Diversity, Equity, and Inclusion Experts

Reach content is taught by Paradigm experts Dr. Evelyn Carter, Dr. Carissa Romero, and Joelle Emerson, leaders who

have pioneered research in the space and helped transform diversity, equity, and inclusion strategies for the world's most forward-thinking companies.

TIP Outsourced online DEI training platform leveraging DEI experts

EZRA: Create change from within

Coaching helps all your employees get the skills they need to take center stage.

TIP Online DEI coaching for employees using pre-made or bespoke programmes

Inclusive Culture

Fostering a culture of inclusion for all



Background

- A recruitment strategy incorporating diversity considerations is not much good without an inclusive culture. Without this, a firm is unlikely to retain its employees if there are individuals who feel they do not fit, are not welcomed or accepted, or if they believe they have been excluded due to a protected characteristic.
- Inclusivity does not have to mean that we ignore the differences between individuals or pretend they do not exist, but rather the holy grail is to foster a culture within the firm that respects and values these differences, where individuals all feel seen, heard, and supported.

Considerations

- What proactive actions are the firm currently taking to foster a culture of inclusivity?
- Are there any existing barriers within the firm to an inclusive culture? If so, how can we tear them down?
- What platforms can the firm offer to its employees, to enable them to celebrate diverse characteristics?
- Are there any other structures or policies in place that need amending to align with the firm's DEI strategy and ambitions?

Guidance

- **CRITICALLY EVALUATE YOUR EXISTING CULTURE:** if you conducted an employee survey, you may already have a good idea as to how inclusive your employees view the firm. Feedback from that survey can help point you towards areas in which there may be room for improvement. Besides the survey, think critically about whether there are any existing barriers to diversity, equity, and inclusion in your company and its culture. If so, work to remove them. For example:
 - Make adjustments to the office environment to improve accessibility to those with physical disabilities such as sight impairment or one requiring the use of a wheelchair
- **EMPLOYEE RESOURCE GROUPS:** consider supporting the creation of ERG platforms for employees. These are essentially mini communities within the firm for individuals with shared identities, characteristics or interests, which can be used to improve visibility of these groups at the firm and foster a sense of belonging. To make these groups more effective, align the groups objectives with the firm's DEI strategy. Example:
 - Providing funding for ERG members to attend professional events related to their identities or characteristics
- **ENCOURAGE ENGAGEMENT:** encourage engagement from all employees, regardless of their identity or characteristics. For example:
 - Through an LGBTQIA Allies network, so that employees besides those identifying as LGBTQIA can support and get involved.
- **MENTORSHIP:** mentorship programmes, by connecting more junior employees with senior team members who share an identity or characteristic offers the mentor a chance to 'give back', and the mentee a chance to learn from someone whose background or experience aligns with their own. In particular, to gain direct exposure to an individual in a leadership position can be a source of inspiration.
- **UPDATE OTHER FIRM POLICIES:** having developed an upgraded DEI policy, you might want to revisit other existing policies such as your Code of Conduct or Supplier Policy to ensure it is aligned with your DEI strategy.

Best Practice Example 15

Fostering a culture of inclusion for all



Talent and leadership pipeline

In October 2022, we started **Prepare to Launch**, a 12-month mentoring program for high-potential Black employees at the mid- to senior-level. The program consists of mentoring circles, where five to six participants are paired with an executive leader to hone their leadership skills through both direct mentoring and executive coaching. The program is nomination-based and serves as an opportunity for the company to better understand challenges and opportunities in attracting and retaining top Black talent.

TIP Mentorship programme linked with an educational angle akin to an in-house MBA programme

Our **Women's Leadership Circle** and **Hispanic Leadership Circle** programs are for mid-career employees. These programs, which are geared toward female and Hispanic employees on the leadership track, provide participants with development tools, access to networking opportunities and other educational resources. Participants not only develop leadership capabilities, but also gain exposure to Executive Sponsors to propel their career trajectory at Nielsen. At the same time, we encourage participants to share their learnings with their own teams and find ways to impact diverse representation in their roles. We've already seen

promising results—for example, one Women's Leadership Circle graduate helped increase the number of women in the Nielsen Sports Operations team by 130% in two years. In 2022, we had over 60 participants in both the Women's Leadership Circle, which is offered internationally, and the Hispanic Leadership Circle, which is open to U.S. employees.

The **Diverse Leadership Network (DLN)** program is our flagship one-year career leadership development program, which provides the opportunity to take executive education courses at Emory University.

DLN is open to mid-career top performers throughout the company. Our 2022 DLN class recorded a retention rate of over 80%, with nearly half of the participants moving into a new role after graduation. Each annual class of approximately 30 people receives mentorship, executive coaching and monthly workshops, as well as the chance to sharpen their skills working on Nielsen case studies. Participants receive a certificate of completion in executive education from the university at the end of the program.

"From the [Diverse Leadership Network] program, I learned a plethora of things: branding, impact, people development, stakeholder management, networking, culture champion. So much! But the most meaningful thing that I learned is that I have the power to create what it is that I desire."

Dana Parker
Membership Manager, OLN Class of 2022



TIP Array of resource groups allowing employees to engage with others who identify as part of the same group across a range of characteristics, identities, experiences and interests

Best Practice Example 16

Fostering a culture of inclusion for all



Unilever

We spent €818 million with diverse businesses in 2022.

Our supplier diversity programme is now live in 22 key markets, and we are encouraging our existing supplier partners to join us in driving positive social change.

We are committed to creating a more inclusive supply chain which incorporates diverse businesses. These are businesses which are owned, managed and controlled by members of under-represented or minority groups in the country in which they operate.

In 2022, our spend with diverse businesses reached €818 million, thanks to the growth of our supplier diversity programme which is now live in 22 key markets. New partnerships with supplier diversity bodies such as She Trades and Supplier Gateway have helped us to expand our programme into new markets and amplified our advocacy efforts. By the end of 2022, 551 suppliers had qualified for the programme. We also plan to continue to phase this into new markets to drive positive social change globally.

We are supporting our diverse suppliers to overcome the barriers that have stood in their way in the past, by promoting access to skills, mentoring and finance. For example, in Kenya we are partnering with Citibank to offer access to preferential financing for suppliers which are owned by women.

To help expand our diverse supplier programme, we continue to encourage our suppliers to sign up to our supplier diversity pledge. We are also exploring ways to measure our spend with Tier 2 suppliers—diverse businesses who supply our suppliers. In 2022, we successfully piloted Tier 2 diverse spend reporting in the US and we hope to roll this out to more markets in the near future.

TIP Updated procurement/supplier policy to reflect the company's own DEI strategy and priorities

We are piloting a new Equity & Inclusion Advancement Framework

We are developing a bespoke framework to assess our policies and practices so that we can identify the opportunities to implement interventions that counteract biases where they may exist.

Equity is the cornerstone of our ambition to be a Beacon of Diversity and Inclusion—for the benefit of our people and for our business. We believe that diverse teams operating within an inclusive environment can support our aim to unlock business performance and respond faster to changing consumer needs. Our 2022 UniVoice survey confirmed that we are making progress towards our ambition, with 84% of employees agreeing that our leadership stands for Equity, Diversity and Inclusion.

In 2022, we launched an Equity Advancement Framework to provide an in-depth diagnostic of all aspects of Equity, Diversity & Inclusion across our business so we can target interventions to eliminate systemic biases within our processes and systems. Using the Framework, we have so far reviewed more than 20 areas of our HR practices, such as recruitment, talent management, learning, employee listening, data analytics and wellbeing. This work has provided important insights into the barriers to equity in each of these areas and informed actions to help us achieve more equitable outcomes for our employees.

In parallel, around 900 leaders have participated in the Unilever Leadership for Purpose Programme which included an Inclusive leader assessment to measure key competencies for Equity, Diversity & Inclusion. The results have informed our three priority areas for future capability building: advocating for equity, counteracting bias and building psychological safety.

TIP Examination of the company's existing culture, taking an introspective approach to critically evaluate where there may be room for improvement and how DEI outcomes can be enhanced across the company

Best Practice Example 17

Fostering a culture of inclusion for all



People with disabilities and diverse wellness needs are important to our workforce.

We ensure we have accessible workplaces and support our employees to be their best selves. Our intention is to recognize and bring awareness to the full spectrum of different abilities and wellness needs, to ensure we are inclusive beyond the “traditional” definition of disability.

TIP Clear statement that accessibility is important to the business and why it is—explaining that they believe this allows employees to thrive through the provision of an inclusive culture

Culture of Inclusion

By elevating disability awareness and inclusion, we are creating an environment and culture where all employees can thrive.

Accessibility Toolkit

An accessible workplace means not only physical accessibility but also digital accessibility, so that information and communication technology is accessible to all our employees. There are no limits to what people can achieve and we’ve developed a toolkit to support accessibility.

- **VISION:** Tools for people who are blind, color blind, or have low vision.
- **HEARING:** For those who are hard of hearing, have hearing loss, or have deafness, we provide solutions including closed captioning, mono sound and live call transcription.
- **NEURODIVERGENCE:** Innovative tools such as dictation and Windows Hello sign-in can make the digital world more accessible for those who live with dyslexia, seizures, autism or other cognitive differences.
- **MENTAL HEALTH:** We provide assistive technologies that help with distraction, reading and concentration for people living with bipolar disorder, anxiety, PTSD or depression.

Language: As a global company, we span across many countries and numerous languages. Language assistance and translation technologies enable us to work in our preferred languages.

If you are an individual with a disability and need a reasonable accommodation to assist with your job search or application for employment, please [click here](#).

TIP Making amendments and accommodations to the working environment to **improve accessibility** for all employees—helping to foster an inclusive culture

Data & Metrics

Selecting the metrics—and setting targets—relevant for your business



Background

- As the adage goes, “what gets measured gets managed”. DEI is no different. Developing your overall DEI strategy should help point you in the direction of the kinds of data you should be collecting, and metrics you might want to track in order to gauge how your firm is performing in terms of DEI.

Considerations

- What protected characteristics / equality data does the firm want to track?
- What is the best method of gathering personal data in a way that protects our employees?
- What are we going to do with collected data? What insights do we want to glean from it?
- What goals should we set against key performance indicators?
- Who will we share this information with? Management team only? Employees? Investors? The wider public?

Guidance

- HARD DATA:** within reason, your firm might want to begin collect hard data on its employee base in relation to any of the protected characteristics (for example, age, disability, race, religious belief, gender, trans or non-binary identity, marital and civil partnership status, pregnancy or parental status, sexual orientation, socioeconomic background, and caring responsibilities). For best practice, offer a ‘prefer not to say’ option.
 - Recommended Reading:** European Commission, European Handbook on Equality data Chapter 7: Diversity monitoring by organisations, 2016 revision ([link here](#))
- SOFT DATA:** consider carrying out your employee DEI survey (example provided in Annex I) on an annual basis. This could be on a standalone basis or as part of a wider employee satisfaction survey, and should be anonymous. If your survey allows, consider including questions that

would allow you to segregate the data based on identities or characteristics (where this would not infringe upon respondent’s anonymity)—this should give you further insights. For example, understanding the gender split in responses to the statement ‘the firm offers equal opportunity to all’ could help to identify groups which have been the subject of conscious or unconscious bias within the firm.

- METRICS:** determine a set of metrics you think would help the firm measure its performance against its DEI strategy. See below for a non-exhaustive list of potential metrics you might consider.
- TARGETS:** Depending on your firm’s ambition level, it could be helpful to define both short-term and long-term quantitative targets across key metrics. Targets should be ambitious but achievable, and reflect your firm’s DEI beliefs and overall strategy.

EXAMPLE METRICS

Total % of [X] ¹ Employees	% of [X] ² Promotions
% of [X] ² Employees by Management Level	Turnover by [X] ²
% of [X] ² New Hires	Average Time in Management Levels by [X] ²

¹ Specific identities or characteristics, such as those who identify as female, disabled, belonging to an ethnic minority, etc.

² Diversity category, for example gender, race

Best Practice Example 18

Selecting the metrics—and setting targets—relevant for your business



BBC

Explaining our new 50:20:12 targets

Using predictive analysis we have determined our new diversity goals and commitments, announced by our new Director-General in September 2020. In his introductory speech to colleagues, Tim Davie committed to creating an organisation which reflects more accurately the society we serve. That means a gender balance at the BBC, at least 20% Black, Asian and minority ethnic staff, and building from at least 120/0 disabled staff towards reflecting the UK population. In addition we will deliver 50:20:12 plans to build our socio-economic diversity, as well as ensuring we are truly inclusive for all LGBTQ+ employees.

GENDER 50%

We remain committed to achieving gender balance at all levels of our workforce. This includes representation of men and women, and we are currently in the process of running a staff diversity census which will for the first time capture non-binary or non-conforming identities.

ETHNICITY 20%

Our 20% target for the representation of Black, Asian and minority ethnic staff and leaders takes account of the fact that our major hubs are located in the UK's most diverse cities. Our city hubs should make a larger contribution to this target, while regional offices should reflect the locations they serve.

DISABILITY 12%

In consultation with disabled staff in 2018 we set a goal of 12% to reach by 2022. This is now our public commitment and we pledge to review progress and incrementally increase the target until we better reflect the disabled population of the UK.

LGBTQ+

ONS estimates the UK population is 2.6% LGBTQ+. At the BBC 8.9% of our staff have told us they are LGBTQ+ and many still prefer not to say. LGBTQ+ representation at the BBC is strong, but we know from staff surveys that many of our LGBTQ+ staff still aren't open about their LGBTQ+ identity at work. We commit to increasing the number of LGBTQ+ staff who are open about their LGBTQ+ identity in the workplace to at least 50%.

TIP Provides additional context as to why certain goals have been selected

SOCIO-ECONOMIC DIVERSITY

This is a relatively new area of best practice and we currently only have 58% of staff who have declared their socio-economic background. Through our 2021 census we want to boost declarations to 80% and use that data to set a meaningful target, to be announced in July 2021.

TIP Updated targets as progress is achieved, demonstrated through reporting data year-on-year

MEASURE	UNIT	BBC 15-16 FULL-YEAR	BBC 19-20 FULL-YEAR	2020 TARGET	NEW TARGET(S)
Gender	All staff	48.7%	48.3%	50%	50%
	Leadership	41.4%	45.0%	50%	50%
BAME	All staff	13.4%	15.1%	15%	20%
	Leadership	9.2%	11.9%	15%	20%
Disability	All staff	3.6%	9.4%	8%	12%
	Leadership	2.8%	8.0%	8%	12%
LGBTQ+	All staff	n/a	8.8%	8%	Over 50% out at work*
	Leadership	n/a	8.9%	8%	Over 50% out at work*

* Defined as being open about your LGBTQ+ identity to your manager, measured by an annual staff survey.



TIP Interactive tool allows users to search for metrics in a clear and user-friendly format



TIP Granular data that can be compared across multiple levels of seniority

Best Practice Example 19

Selecting the metrics—and setting targets—relevant for your business



We gather a range of data that is presented in specific ways in this report

BROADER MICROSOFT AND CORE MICROSOFT

Broader Microsoft business includes the core Microsoft business, plus minimally integrated companies. Employees of joint ventures and newly acquired companies are not included in the data.

LinkedIn was acquired in December 2016. GitHub was acquired in June 2018. We provide standalone data for these two acquisitions. Nuance Communications was acquired in March 2022. Minimally integrated gaming studios were acquired starting in June 2018, with the most recent acquisition, ZeniMax Media, occurring in March 2021.

Core Microsoft business represents 83.9% of the worldwide broader Microsoft workforce.

DATA GATHERING AND EXPRESSION

All data on gender is collected globally. Numbers for gender may not total 100% due to inclusion of people who identify as transgender, non-binary, or who choose not to disclose.

Racial and ethnic data reflects the US only. Numbers may not total 100% due to inclusion of people who choose not to disclose.

Percentages are calculated to the 1/100th but rounded and published in 1/10th. Differentials may differ slightly due to rounding. Totals may not equal 100% due to rounding or because denominators include people who choose not to disclose.

Historical numbers may differ slightly due to rounding and refinements in methodology or data capture year over year. Unless otherwise indicated, data presented is a snapshot taken on June 30 of the year referenced.

TIP Disclosed methodology behind the company's reported data is explained well

REPRESENTATION VS. POPULATION

At Microsoft, we look at employee diversity data through two different lenses:

Representation data indicates how particular groups are represented in terms of their percentage of the workforce as a whole.

Population data looks at headcount numbers, comparing year-over-year absolute growth within a particular group.

Both of these are important to consider in achieving our goals for greater diversity and inclusion. As Microsoft grows, year-over-year representation numbers may not tell the whole story of progress, because the base workforce number is also increasing. For a group to increase representation, the population of that group needs to grow at an equal or greater rate than the general employee population. Looking at population offers an indication of absolute growth within groups to paint a broader picture of true progress.

RACE AND ETHNICITY CATEGORIES

Data referenced in this report reflects numbers reported to the US Equal Employment Opportunity Commission based on these categories:

ASIAN: A person having origins in any of the original peoples of East Asia (China, Hong Kong, Japan, Macau, Mongolia, North Korea, South Korea, and Taiwan), South Asia (Afghanistan, Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan, and Sri Lanka) and Southeast Asia (Burma, Brunei, Cambodia, East Timor, Indonesia, Laos, Malaysia, Philippines, Singapore, Thailand, and Vietnam).

BLACK AND AFRICAN AMERICAN: A person having origins in any of the Black racial groups of Africa.

TIP Includes definitions of particular data points to provide clarity on data reported

HISPANIC AND LATINX: A person of Cuban, Mexican, Puerto Rican, Central or South American, or other Spanish-speaking culture or origin, regardless of race.

NATIVE AMERICAN AND ALASKA NATIVE: A person having origins in any of the original peoples of North and South America (including Central America) who maintain tribal affiliation or community attachment.



NATIVE HAWAIIAN AND PACIFIC ISLANDER: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

WHITE: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

MULTIRACIAL: A person who identifies with more than one of the above six races or ethnicities.

LEVELS AND ROLES

As used in this report only, the following descriptions apply to the core Microsoft business:

EXECUTIVE: Executive roles across all functions.

PARTNER + EXECUTIVE: Employees with various partner and executive roles across all functions.

DIRECTOR: Employees with various director roles across all functions.

PEOPLE MANAGER: Employees at any level with at least one employee role reporting to them.

INDIVIDUAL CONTRIBUTOR: Employees at any level without any employee roles reporting to them.

TECHNICAL: The talent architecture initiative was launched a few years ago to better position Microsoft to grow and retain our talent through improved data insights of our roles benchmarked to market.

Supporting Initiatives

Practicing what you preach



Background

- While your DEI policy lays the foundation, a diverse, equitable and inclusive firm will not build itself. Supporting initiatives need not form part of the formal policy, but represent the steps your firm takes to implement its DEI policy to make your vision a reality. Here is where your firm has the opportunity to set itself apart—to showcase its commitment through tangible action.
- Dependent on your ambition level, it is common to begin by implementing some of the more commonplace initiatives.

Considerations

- Do we know what best practice looks like, and where can we seek inspiration for DEI-related initiatives?
- Are there any specific DEI-related workplace benefits we can provide to support our employees?
- How can we go above and beyond the bare minimum, to offer something to existing and prospective employees that sets us apart?
- How can we demonstrate true leadership?

Guidance

- **MEMBERSHIPS:** your firm could become a signatory to principles or codes that seek to uphold strong DEI values, for example:
 - The Women’s Empowerment Principles of the United Nations
 - The United Nations Standards of Conduct for Business Fighting against Discrimination towards LGBTI+ People
 - The International Labor Organization’s Labor Standards managing disabilities in the workplace
- **INDUSTRY GROUPS:** your firm may consider becoming a member of an industry group relating to advancing DEI, or otherwise getting involved in organisations that promote DEI. For example:
 - D&I Leaders Club - a free-to-join community of >15,000 DEI professionals
- **EMPLOYEE BENEFITS:** upgrading your firm’s employee benefits package where they could have a positive impact on diversity, equity or inclusivity. For example:
 - Increasing the amount of paid paternity leave offered for new fathers
 - Offering flexible working arrangements to accommodate employees with carer responsibilities
- **EXTERNAL ACTIVITY:** your firm may wish to advertise its strong DEI practices more publicly, particularly if you believe it could be a differentiating factor to any of your various stakeholders. For example:
 - Participating in DEI conferences to share experiences and learnings
 - Sponsorships of events promoting one or more diverse characteristics, e.g. local pride parade
- **DEI REPORTING:** producing a publicly available annual DEI report is a fantastic way of demonstrating to your stakeholders exactly what work you have done, are doing, and will do to further advance DEI within the firm. While your DEI policy is a static document, an annual report allows you to highlight specific actions you have taken, to disclose data and metrics, and to provide commentary on progress and next steps—or any other information you wish to share.
- **PRODUCT/SERVICE CONSIDERATIONS:** finding a way to promote your DEI values through the products and services you offer, where applicable

Best Practice Example 20

Practicing what you preach



Global business partnership of 500 companies working together to end disability exclusion.



UN-supported forum for advancing gender equality



Partnership between the OECD and a global, CEO-led coalition of companies fighting against inequalities



An initiative of the United Nations Human Rights Office promoting equal rights for LGBTQIA+

WOMEN'S EMPOWERMENT PRINCIPLES

Principles offering guidance on how to advance gender equality and women's empowerment.



International Labour Organization

Multinational companies working with the ILO in relation to disability in business



Employees Celebrate PRIDE

Disney is a leader in LGBTQ+ workplace equality. Thousands of members of Disney's workforce participate in LGBTQ+ business employee resource groups and LGBTQ+ Pride events globally.

TIP Company-supported employee participation in DEI-related events

LVMH

LVMH and its Maisons are committed to crafting a more inclusive world. From our marketing campaigns to our store experience, we ensure that everyone feels represented and respected. At the Group level, we amplify and advocate for the promotion of diversity and inclusion through global communications, putting the spotlight on our engagement and reflecting our diversity of talents, sectors and métiers.

TIP Addressing DEI through the way the firm offers its products and services, including how they are marketed

Our Maisons also strive to represent the diversity of our clients and reflect the plurality of the world, while mirroring the local fabric of societies.



Community outreach

Our team advocates for under-represented groups and promotes diversity, equity and inclusion in our local communities. We work with organizations including the Advertising Research Foundation and GLAAD. We also provide pro bono data and consulting through our Data for Good program and the Nielsen Foundation. To support small businesses, which are the backbone of so many diverse communities, we provide resources, including pro bono consulting, via our Small Business Resources website.

TIP Proactively engaging with under-represented communities and onboarding an external adviser to help outreach initiatives.

To stay on top of issues that matter to our industry and clients, we work with an external advisory council of marketers and media professionals. They provide diverse perspectives on our various strategies. We also work to influence pro-business and pro-talent policies (including amicus briefs and diversity pledges), and promote representation through census and voting campaigns.

Best Practice Example 21

Practicing what you preach



Introduction

Important terms used in this report

Tip In-depth reporting on DEI strategy, targets, progress, data and metrics, actions over the past year etc.

Introduction

Notable takeaways

Deloitte has been critical in helping us quantify and understand our progress across all key areas. We are proud to have been recognized as a leader in DEI progress in 2022.

The last two years clearly represent a period of growth, growth in our workforce, growth in our commitment to DEI, and growth in our ability to attract and retain diverse talent.

The past year has been a year of growth, growth in our workforce, growth in our commitment to DEI, and growth in our ability to attract and retain diverse talent.

Introduction

Progress Highlights

53.2% **53.2%** **53.2%** **53.2%**

35.8% **35.8%** **35.8%** **35.8%**

6.6% **6.6%** **6.6%** **6.6%**

2.6% **2.6%** **2.6%** **2.6%**

7.6% **7.6%** **7.6%** **7.6%**

2.8% **2.8%** **2.8%** **2.8%**

Introduction

Our mission-driven commitment

At Microsoft, we're mission-driven. We're committed to diversity and inclusion, and we're committed to making our products and services more inclusive.

We're committed to diversity and inclusion, and we're committed to making our products and services more inclusive.

We're committed to diversity and inclusion, and we're committed to making our products and services more inclusive.

Introduction

Innovation spotlights

We have a long history of innovation, and we're committed to making our products and services more inclusive.

We have a long history of innovation, and we're committed to making our products and services more inclusive.

We have a long history of innovation, and we're committed to making our products and services more inclusive.

Introduction

Representation

51.9% **51.9%** **51.9%** **51.9%**

6.9% **6.9%** **6.9%** **6.9%**

3.3% **3.3%** **3.3%** **3.3%**

Introduction

Representation

51.9% **51.9%** **51.9%** **51.9%**

6.9% **6.9%** **6.9%** **6.9%**

3.3% **3.3%** **3.3%** **3.3%**

Source: Microsoft 2022 DEI report [here](#)

Annex I

Example template DEI employee survey

1 STRONGLY DISAGREE	2 SOMEWHAT DISAGREE	3 NEUTRAL	4 SOMEWHAT AGREE	5 STRONGLY AGREE
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Using the scale above, to what extent do you agree with the following statements:

QUESTION	ANSWER
DEI is critical to the firm's success	
The firm's leadership are committed to DEI	
The firm's approach to DEI is sufficiently robust	
The firm offers equal opportunities to all	
The firm's senior management are diverse	
My manager takes DEI seriously	
My team is diverse and benefits from cognitive diversity	
My team is inclusive	
The firm's overall culture is inclusive	
I have witnessed discrimination or bias (whether intentional or not) while at the firm	
I have experienced discrimination or bias (whether intentional or not) while at the firm	
I am familiar with the firm's DEI policies	
I am aware of specific actions the firm is taking / has taken to improve DEI	
The firm's hiring practices succeed in preventing unconscious bias	
I could benefit from further education or training on DEI / unconscious bias etc	
The firm's tracking of DEI metrics, such as gender pay gap, are sufficient	
I would like to see the firm focus more on DEI	
I am conscious of the role I play in fostering an inclusive culture	
I am conscious of the ways in which I can support the firm's DEI goals	



Annex II

Resource library

RESOURCE	DESCRIPTION	LINK
UN Principles for Responsible Investment: DE&I - Key Action Areas for Investors	In-depth summary of DE&I justifications and DE&I actions, drafted specifically for investors	Here
ACAS (a UK based employment advisory service)	Equality, diversity and inclusion policy template	Here
Founders Factory	Practical action points for building a diverse, equitable and inclusive growth-stage company	Here
British Private Equity & Venture Capital Association	Guidance and Best Practice Examples for VCs, Private Equity and Institutional Investors	Here
McKinsey – Diversity Wins	Data driven research into the financial case for DEI	Here
Out & Equal Global Toolkit for Change	A toolkit for maximising LGBTQI+ inclusion in the workplace	Here
Disability: IN best practices collection	A collection of best practice corporate examples for considering disabilities of all kinds.	Here

