



# **Diversity, Equity, Inclusion and Sense of Belonging Policy**

## Identification of Responsibilities

**Draft:** Directorate for People and Organisation (*Direção de Pessoas e Organização*) with the contribution of the Legal Affairs Directorate (*Direção de Assuntos Jurídicos*) and the Sustainability Directorate (*Direção de Sustentabilidade*)

**Review:** Directorate for People and Organisation (*Direção de Pessoas e Organização*) with the contribution of the Legal Affairs Directorate (*Direção de Assuntos Jurídicos*) and the Sustainability Directorate (*Direção de Sustentabilidade*)

**Approval:** Executive Board

## Approval

Executive Board Meeting: 25/07/2023

## Version History

Version	Date	Overview of amendments
1.0	25/07/2023	First version

## Overview of the review of chapters/appendices of the latest version

Revised Chapter/ Appendix	Overview of amendments
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**NONCOMMITTAL TRANSLATION.** THIS IS A FREE TRANSLATION INTO THE ENGLISH LANGUAGE FROM THE ORIGINAL PORTUGUESE VERSION AND IS INTENDED ONLY FOR SUPPORTING PURPOSES. THE ONLY BINDING WORDING IS THE ONE IN THE PORTUGUESE LANGUAGE.

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## 1. Framework

At the Fidelidade Group we work "so that life doesn't stop". This is our purpose. For a long time now, in our decision-making processes, in our relations with stakeholders and in our day-to-day activities, we have

been an active economic agent seeking to make the places where we operate more prosperous, sustainable, healthy, and inclusive. In addition, the Fidelidade Group has historically valued and recognised each and every one of its people, always putting them first.

We live in an increasingly global and diverse context, so diversity is part of our daily concerns. We follow a direction that involves conscious work, so that everyone feels that they belong to the organisation, that they have the same opportunities, and that they mirror who we are as a Group. That's why we are committed to initiatives that create a fairer and more equitable environment. We are committed to constant improvement: we do our best to keep up with progress. That is why we are taking the road that brings us face to face with the challenges of Diversity, Equity, Inclusion, and a Sense of Belonging.

The Fidelidade Group's mission is to protect people, their health, their property, and their businesses. We are a group where we not only accept and value individuality, but also encourage the inclusion of each person.

This policy is part of a wider set of measures developed by the Fidelidade Group and is related to the strategy and commitment it has assumed, particularly in terms of wellbeing. The Fidelidade Group's approach to wellbeing is holistic and present throughout the employee's career. Based on four Pillars, it reflects the importance of career, personal, family, and social experiences, physical and mental health, and financial literacy and stability:

- **Corporate:** so that people feel good throughout their professional experience, from recruitment to potential departure, and aligned with an organisational culture of trust;
- **Lifestyle:** so that people feel supported in their personal lives whenever necessary, encouraged to make the most of their time and inspired to make a difference;
- **Health:** so that people feel good physically and mentally, by including healthy habits in their daily lives and being carefully attended to in any situation;
- **Financial:** so that people have a good level of financial literacy, understand reward concepts, consciously manage their budgets, and achieve their goals.

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## 2. Scope

The aim of this Policy is to define the guidelines for the Fidelidade Group's actions in terms of Diversity, Equity, Inclusion and Sense of Belonging.

This Policy is applicable to the employees of the companies that are part of the Fidelidade Group, with the exception of the Luz Saúde Group, hereinafter referred to as "our People".

With regards to the Group's companies present in other geographies other than Portugal, the principles set out in this Policy are also applicable as guidelines.

The different companies of the Group operating outside Portugal may also implement specific policies and programmes, in accordance with their local legislation and culture, consistent with the guidelines comprised in this Policy.

Everyone in the Group, whether in-house or subcontractors, partners, or suppliers, must be aware of, committed to, and act in accordance with the guidelines set out in this Policy.

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### 3. Most relevant concepts

For the purposes of applying this Policy, there are a number of relevant concepts, without prejudice to others arising from applicable legislation or other documents from reputable sources. The concepts identified below intend to support, communicate, and enable learning on topics related to diversity, equity, inclusion and a sense of belonging in an organisational environment.

Recognising these terms reiterates the Fidelidade Group's commitment to use references that lead to positive actions which promote a more inclusive working environment.

**Diversity:** recognising, respecting, and valuing differences between people, including, in particular, those relating to gender, gender identity, sexual orientation, ethnicity, religion, creed, territory of origin, culture, language, nationality, place of birth, ancestry, age, political and ideological orientation, social background, marital status, family situation, economic situation, health status, disability, personal style and education, so as to include everyone.

**Fairness:** the ability of all members of a community to have full access to all opportunities, benefits, and resources. Fairness can be defined as fair treatment and the creation of equal opportunities for everyone.

**Inclusion:** recognising and valuing differences, creating environments that favour all people and their personal characteristics. It's about encouraging the creation of environments where everyone feels respected, welcomed, valued, and supported.

**Sense of belonging:** involvement in a community, including a sense of integration, connection, and responsibility for shared goals.

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### 4. Legal framework, conventions, and internal regulations

In order to draft and implement this Policy, a number of national and international documents were used as references, as well as a number of internal documents which are identified below.

#### 4.1. National and international external benchmarks:

##### European Union

- Towards a Union of Equality: Gender equality strategy 2020-2025, European Commission
- European Pact for Gender Equality, Council of the European Union
- Directive (EU) 2019/882 on accessibility requirements for products and services, European Parliament

##### United Nations

- Universal Declaration of Human Rights, United Nations

- International Convention on the Elimination of All Forms of Racial Discrimination
- Convention on the Elimination of All Forms of Discrimination against Women
- Convention on the Rights of Persons with Disabilities

#### **United Nations Sustainable Development Goals (SDGs)**

- SDG 5 – Gender Equality
- SDG 10 – Reduced Inequalities

#### **Global Reporting Initiatives**

- GRI 405 – Diversity and Equal Opportunities
- GRI 406 – Non-discrimination

#### **Other documents**

- UN Global Compact
- Principles of Sustainability Insurance (PSI)
- APPDI Association - Charter of Principles for Diversity
- ILO Declaration on Fundamental Principles and Rights at Work
- EFRAG - ESRS S1 Own Workforce

#### **4.2. Internal Benchmarks**

- Code of Conduct (*Código de Conduta*)
- Sustainability Policy (*Política de Sustentabilidade*)
- Reporting of Irregularities Policy (*Política de Comunicação de Irregularidades*).

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## **5. Strategic guidelines for valuing diversity, fairness and promoting a more inclusive organisation**

The Fidelidade Group is committed to promoting and maintaining an Organisation based on the Diversity of our people, on Fairness and active Inclusion, fostering a sense of Belonging.

We believe that it is only by having an organisation made up of people with diverse perspectives, backgrounds, and experiences, and with respect for the socio-cultural aspects of the communities in which we operate, that it will be possible to have a better working environment and increase the quality of our services for our stakeholders.

This Policy sets out the Group's guiding principles and commitments in the areas of diversity, equity, inclusion, and sense of belonging. At the same time, it considers the following priority areas: gender; disability; social context and origins.

**The priority areas may change or be adjusted depending on the circumstances.**

- **Gender:** we are committed to deepening equal opportunities by promoting diverse and global teams, with particular attention to selection and hiring processes, evaluation, remuneration, growth and pay equity.

- **Social Context and Origins:** we are committed to improving social representation in the companies of the Fidelidade Group.

Only then will we be able to better understand the needs of the people we work for.

We invest in training and capacity building to challenge stereotypes and prejudices of gender and of social backgrounds and contexts, avoiding harassment at work and promoting a good balance between family and work.

- **Disability:** we recognise that having a disability, of any kind, creates increased difficulties for employability, so we want to work harder towards reducing the stigmas that may be associated with disability:

- Promote more employment for people with disabilities,
- Adapt the work environment to their needs in order to guarantee full integration, whilst also supporting the relevant teams in their preparation, capacity building, and training to receive such individuals.

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## 6. Our Principles and Key Commitments

- **Building a reference environment for the promotion of acceptance and respect for individuality:** as a Group, we have the responsibility to devise and implement processes that actively contribute to ensuring that everyone, regardless of their cultural, social, and ethnic origin, religion, ideology, political or sexual orientation, gender, age, disability, physical characteristics, personal style, or nationality, feels accepted and respected in their individuality. Our aim is to promote a physically and emotionally safe space by finding and implementing inclusive solutions that materialise in specific, cross-sectional, and tangible behaviours.
- **Do not tolerate prejudice, discrimination, and harassment:** it is the duty of every member of the Group to uphold the dignity and human rights of all other individuals, by adopting a correct attitude and ensuring compliance with the law and the internal regulations in force. We contribute to the advancement of our people by ensuring equal opportunities, motivating the development of knowledge, and promoting a good working environment, free from discrimination and harassment, based on mutual respect and support. We are also committed to promoting the use of inclusive language that respects the individuality of each person and does not reflect any kind of prejudice or discrimination.
- **Promote an increasingly inspiring leadership and foster diversity, equity, inclusion, and a sense of Belonging:** Everyone who manages teams should lead by example in conveying the principles of Diversity, Equity, Inclusion and Sense of Belonging. It is his or her responsibility to ensure that the principles and values of this Policy are effectively applied in the organisation by promoting a diverse, equitable and inclusive culture.

- **Promote inclusive recruitment processes:** we are committed to promoting equal opportunities in global and diverse teams. Thus, we want to continue to i) promote the hiring or internal mobility of women for positions of responsibility and leadership; ii) promote the hiring of people with special needs, of whatever nature, and support teams in their full integration, striving for an environment adapted to the needs of each person; iii) promote equal opportunities in hiring processes and internal mobility (national or international), which take into account the qualifications and competences of people, regardless of their social context and origin. We want the Fidelidade Group to be made up of people who bring to the organisation different perspectives on how to analyse problems and create solutions, based on their professional, personal, social, and cultural experiences.
- **Promoting equal opportunities for growth and development within the Group:** by following an inclusive recruitment process, we want all people, regardless of their gender, gender identity, sexual orientation, ethnicity, religion, territory of origin, culture, language, nationality, place of birth, ancestry, age, political or ideological orientation, social background, marital status, family situation, economic situation, health status, disability and personal style, to enjoy equal access to integration, to the development of their work and also within the Group.
- **Promoting pay equity:** the Fidelidade Group is committed to evaluating, monitoring, and eliminating all situations of unjustified discrimination and unequal pay, particularly on grounds of gender, under the terms of the legislation in force at any given time regarding the promotion of equal pay for women and men.
- **Promoting behaviours that, together with a sense of belonging to the organisation, enhance physical and mental wellbeing:** a sense of belonging fosters positive interpersonal relationships, reduces stress and anxiety, and increases people's overall satisfaction. We will, therefore, continue to mitigate psychosocial risks, while also promoting initiatives that improve our people's health and wellbeing and promote a good work-life balance.

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## 7. Responsibility

It is the duty of everyone in the Fidelidade Group to take an active role in promoting and strengthening a culture of diversity, equity, inclusion, and a sense of belonging, in the following domains:

- Respect the individuality of each person with whom they interact in the context of their role, complying with the principles of this Policy;
- Relate without prejudice with colleagues or other people with whom they have some business interaction, both inside and outside the Organisation;
- Foster a work environment free of discrimination and harassment;
- Report, through the internal whistleblowing channel, any situations or behaviours that contravene the principles of this Policy.



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## 8. We respect, uphold, and promote Human Rights

We treat everyone who works for the Fidelidade Group fairly and without discrimination. We recognise that our People have the right to work in conditions that respect their physical and moral integrity and their dignity, with absolute respect for the fundamental rights of the individual.

The Fidelidade Group undertakes to respect all nationally and internationally recognised human and labour rights and, in particular, in the context of diversity, equity, inclusion and a sense of belonging, commits itself to:

- **Not tolerate any form of discrimination** based, in particular, on sex, sexual orientation, gender identity, family and/or socio-economic situation, reduced working capacity, disability, chronic illness, ethnic or racial origin, ancestry, nationality, territory of origin, language, religion, political or ideological convictions and trade union membership.
- **Respect and promote freedom of assembly and association**, recognising the right of each person to be represented by any organisation to defend their rights and interests and/or to form affinity/belonging groups, within the applicable legal conditions, and not to be prejudiced or discriminated against for participating in them.

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## 9. Governance Model

The implementation of the undertakings contained in this Policy and the programmes associated with it, as well as their monitoring, reporting and continuous improvement, is the responsibility of the People's Forum (*Fórum de Pessoas*). This forum is tasked with dealing with the issue of Diversity, Equity, Inclusion and Sense of Belonging, and comprises board members, other managers with responsibility for human resources, and corporate managers from each geography. This Forum, in addition to the Directorate for People's (*Direção de Pessoas*) role in implementing this Policy, meets every six months with the following objectives:

- Guarantee and validate the implementation, monitoring, reporting, and continuous improvement of the commitments set out in the Policy and associated programs;
- Promote global alignment discussions designed to advance the implementation of the Group's DEIP strategy;
- Promote a discussion on the results and decide on the next strategic steps;
- Report on implementation, in each geography, and promote the pursuit of commitments with clear objectives and targets;

- Share internal and external benchmarks of knowledge, experiences and best practices, to ensure good decision-making and continuous improvement;
- Promote sharing, learning, and networking among the different geographies of the Group.

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## 10. Reporting mechanisms

In order to contribute to the scrutiny, transparency, effective application of this Policy and its continuous improvement, the following mechanisms are available, and adapted to each country where the Group operates:

1. **Channel for feedback, suggestions, and questions:** a channel opened internally for the Group's companies present in the various geographies, so that all our people can have a voice and share feedbacks, suggestions, and any questions they would like to be clarified on matters relating to this Policy. This channel is managed by the Directorate for People and Organisation (*Direção de Pessoas e Organização* (DPE)), which will analyse, monitor, process and respond to all communications received.
2. **Whistleblowing and reporting of irregularities Channel:** each geography, following its specific national regulations, will have its Whistleblower Protection System and a channel for reporting situations that constitute harassment. Both situations are managed, dealt with, and resolved under the terms of the Reporting of Irregularities Policy (*Política de Comunicação de Irregularidades*), which guarantees the anonymity, confidentiality and data protection of all the people involved in a complaint.

For companies located in other geographies, the aforementioned mechanisms are in final completion for their implementation.

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## 11. Policy Review, Update and Monitoring

This policy comes into force on the date of its approval by the Executive Board. The Directorate for People and Organisation (*Direção de Pessoas e Organização* (DPE)) of the Fidelidade Group in Portugal is responsible for reviewing it, with the support of the Legal Affairs Directorate (*Direção de Assuntos Jurídicos*) and the Sustainability Directorate (*Direção de Sustentabilidade*), whenever appropriate and in particular in the event of:

- Amendment or modification of the different aspects comprised in this document: scope, procedures, frequency or other relevant aspects;
- Alteration or modification of the applicable rules (legal, regulatory or internal);
- Changes to the organisational structure of the Fidelidade Group.

The Directorate for People and Organisation (*Direção de Pessoas e Organização*) in Portugal monitors the matters set out in this policy, as well as the reporting of irregularities that may occur.

A survey will also be prepared and carried out by an external entity to assess people's perception and take on the subject of Diversity, Equity, Inclusion and Sense of Belonging. This survey will take place on a periodic basis deemed suitable.