



# Diversity, equality and inclusion

## Policy purpose

The IFRS Foundation commits to treating all those we come into contact with fairly, and with dignity and respect. We work to ensure that our staff and leadership do likewise. This policy:

- outlines our commitment throughout the employment lifecycle to diversity, equality, and inclusion and sets out how we put this commitment into practice;
- explains the behaviours we expect of people in support of this commitment; and
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework and how we ensure equality of opportunity throughout the employment lifecycle.

<b>Policy sponsor</b>	Chief people officer	<b>Policy owner</b>	Director of talent development
<b>Date of approval</b>	10 October 2024	<b>Approving body</b>	Human Capital Committee
<b>Effective date</b>	11 October 2024	<b>Internal / external</b>	External
<b>Scope of application</b>	<p>Global: all IFRS Foundation employees including board members, contractors, agency workers, volunteers and interns, collectively 'staff', and IFRS Foundation Trustees (Trustees).</p> <p>The policy also relates to employment candidates (candidates) and is relevant to all stages of the employment relationship.</p>		

## Version control

Date	Version	Updates made
10 <sup>th</sup> October 2024	1.0	N/A
19 <sup>th</sup> November 2024	1.1	Minimal: tidied up formatting on contents page; took out reference to 'mobbing' in definition of 'bullying'; para 2.3 (f) changed 'AIDs' to 'AIDS'

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## Definitions

Term	Definition
belonging	The feeling of being accepted for your authentic self.
bullying	<p>Offensive, intimidating, malicious, or insulting conduct, or an abuse or misuse of power, which is usually persistent, and has the effect of undermining, humiliating or injuring the recipient. Bullying:</p> <ul style="list-style-type: none"> <li>• can be physical, verbal or non-verbal conduct, and is not necessarily face-to-face; and</li> <li>• can happen over email, phone calls, online (cyber-bullying) or on social media, at work or outside work.</li> </ul> <p>If the bullying relates to a characteristic protected by law, it may also constitute harassment and be unlawful.</p>
discrimination	Less favourable treatment based on a person’s actual or perceived protected characteristic(s) whether directly, or indirectly through policies and procedures that disadvantage the person. Discrimination may also be practised by association—for example, treating someone less favourably because they are associated with someone who has a protected characteristic.
diversity	<p>The range of traits and characteristics that our staff and Trustees possess. Diversity can be understood in two ways:</p> <ul style="list-style-type: none"> <li>• diversity of inherent characteristics—for example, race, gender, sexual orientation or disability; and</li> <li>• diversity of acquired characteristics—for example, diversity of thought, communication style, language or social skills.</li> </ul>
equal opportunities	The principle that all employees and candidates are treated fairly and without discrimination, giving everyone the same chance to succeed based on their abilities and qualifications. This means that decisions related to hiring, promotion, training, compensation and other aspects of employment are made without bias or prejudice against protected characteristics.

Term	Definition
equality	All employees have equal access to opportunities, resources and fair treatment regardless of their protected characteristics. Equality in the workplace involves providing fair wages, equal opportunities for promotion and advancement, and a work environment where everyone is treated with respect and dignity.
harassment	<p>Harassment is unwanted conduct related to a protected characteristic that happens on more than one occasion and has the purpose or effect of:</p> <ul style="list-style-type: none"> <li>violating someone else’s dignity; or</li> <li>creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.</li> </ul> <p>Behaviour can be considered harassment even if it is unintentional: but it must be reasonably expected to cause offence, humiliation or other physical or psychological injury or illness.</p>
inclusion	The practice of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised because of their inherent or acquired characteristics.
intersectionality	The ways in which systems of inequality based on innate characteristics ‘intersect’ to create unique dynamics and effects.
mobbing	See ‘bullying’.
protected characteristics	Human characteristics protected under anti-discrimination law. These characteristics may differ in each jurisdiction.
sexual harassment	<p>Sexual harassment is:</p> <ul style="list-style-type: none"> <li>conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and</li> <li>treatment of a less favourable nature related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.</li> </ul> <p>This conduct can be a one-time incident or repeated behaviour.</p>
victimisation	Treating someone detrimentally because that person has made a complaint of discrimination or harassment in good faith, or because they have supported someone else who has made such a complaint—for example, through a witness statement that supports the allegations.
world view	An holistic belief system which may have a religious or secular foundation. This includes, therefore, Humanism or Atheism. This does not include party affiliations or opinions about individual societal issues.

## 1. Introduction

- 1.1. At the IFRS Foundation (Foundation) our people are our most valuable asset. Each of us is unique, whether in terms of background, personal characteristics, experience, skills or motivations. We value our people for their differences. These differences, this diversity, is powerful.
- 1.2. Fostering an inclusive culture helps each of us to benefit from a wider range of perspectives, experiences and skills. We believe that an inclusive culture creates a happier, more productive working environment for us all.
- 1.3. Cultivating such a culture requires ongoing commitment and nurturing particularly because, in the wider world, areas of difference in a person or group often translate to biases, challenges and barriers that might not be faced by others. The more areas of difference, the more this effect can be compounded, as reflected by the concept of 'intersectionality'.

## 2. Policy statement

- 2.1. The Foundation is committed to providing an inclusive workplace that offers equal opportunities to all of our staff and Trustees. We believe that a culture of diversity, equality and inclusion benefits both our organisation and individual members of staff. Such a culture can help create a feeling of belonging that promotes staff wellbeing and enables effective working.
- 2.2. The Foundation is committed to promoting a working environment based on dignity, integrity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.
- 2.3. In practice this commitment means we ensure that our employment terms, as well as our recruitment, promotion and retention procedures, do not treat people more or less favourably because of inherent or other protected characteristics. The Foundation recognises all protected characteristics in the jurisdictions in which it operates. The Foundation recognises protected characteristics as including, irrespective of national discrimination laws:
  - (a) age;
  - (b) sex, gender, gender identity or gender reassignment status;
  - (c) sexual orientation;
  - (d) marital or civil partnership status;
  - (e) pregnancy, maternity, paternity or caregiver status;
  - (f) disability or medical condition, including HIV/AIDS;
  - (g) race, racial group, ethnic, regional or national origin, colour or nationality;
  - (h) religion, beliefs or world view;
  - (i) caste or socio-economic background;
  - (j) veteran or military status;
  - (k) trade union membership status; and
  - (l) conviction for an offence for which a pardon has been granted.
- 2.4. This commitment also means that we will respond swiftly, sensitively and fairly to all reports of discrimination, harassment, bullying or victimisation in line with our Disciplinary Policy and Procedure.

### **Preventing discrimination**

- 2.5. The Foundation will work to prevent discrimination in the workplace, including:
- (a) *direct discrimination*—treating someone less favourably because of an inherent characteristic compared with someone who does not have that characteristic. For example, choosing not to recruit someone because they are disabled in case they ‘wouldn’t fit in’ with the team.
  - (b) *indirect discrimination*—maintaining policies, procedures and ways of working that put people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, without good reason. For example, holding a team working lunch in premises that serve alcohol, where some staff may not be able to attend for religious reasons.
  - (c) *associative discrimination*—treating someone less favourably because they are associated with someone who has a protected characteristic, for example, because their partner is transgender.
  - (d) *discrimination by perception*—treating someone less favourably because you perceive them to have a protected characteristic even if they do not. For example, choosing not to promote someone because you mistakenly believe them to have caring responsibilities.
  - (e) *discrimination arising from disability*—treating someone unfavourably because of something connected with that person’s disability and where such treatment is not justified. Examples include:
    - (i) dismissing someone because of their disability-related absence.
    - (ii) disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by an illness.
    - (iii) failing to make reasonable adjustments.
- 2.6. The Foundation is legally obliged in a number of jurisdictions to make reasonable adjustments to ensure that aspects of employment, or our premises, do not put a disabled person at a substantial disadvantage. Failure to comply with these duties would be unlawful. Examples of reasonable adjustments include:
- (a) *making physical modifications, for example, providing a wheelchair ramp;*
  - (b) *swapping some of the disabled person’s duties with a colleague;*
  - (c) *changing their working hours or place of work;*
  - (d) *adjusting procedures for assessing candidates; and*
  - (e) *modifying disciplinary and grievance procedures.*

### **Bullying, harassment and sexual harassment**

- 2.7. Bullying, harassment and sexual harassment have a harmful and negative impact on individuals and their dignity, and therefore run counter to this policy. Thus, the Foundation resolves to create a positive working environment free from bullying and harassment (see our ‘Anti-bullying and -Harassment Policy—Global’).

## ***Equality of opportunity***

### ***Recruitment and promotion***

- 2.8. We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible. Recruitment selection panels must not unfairly discriminate in any way.
- 2.9. Recruitment selection panels must challenge themselves and their peers, to make sure that any stereotypes, unconscious bias or prejudice do not influence recruitment decisions.
- 2.10. All decisions relating to a person's internal move, promotion, or career development must be free from discrimination.
- 2.11. We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

### ***Disability inclusion***

- 2.12. To ensure that the Foundation provides equality of opportunity and inclusion for disabled people, whether their disability is visible, disclosed, invisible or undisclosed we are committed to:
  - (a) following fair recruitment practices;
  - (b) making our offices and systems fully accessible to people with disabilities, and making reasonable adjustments to our policies, procedures, practices or employment terms where requested;
  - (c) providing access to independent emotional and practical support via our employee assistance programme (see the intranet for more details or contact the HR team for details of our Employee Assistance Programme); and
  - (d) helping our staff to create psychological safety for those with a disability (where people feel able to speak up about their experiences without fear of negative consequences) through the provision of regular diversity, equality and inclusion training to all staff (see section 5).

## **3. Roles and responsibilities**

### ***Responsibilities for this policy***

<b>Person or group</b>	<b>Role</b>
Trustees	Responsible for oversight and for policy approval.
Managing director and Board chairs	Responsible for setting the tone from the top and promoting a culture that values diversity, equality and inclusivity.
Chief people officer [Policy sponsor]	Overall accountability for the effective resourcing and operation of this policy including ensuring compliance with any relevant legislation, maintenance and review.
Director of talent development [Policy owner]	Responsible for drafting, reviewing and updating the policy; first point of contact for queries relating to the policy. Responsible for awareness and training on this policy.
Talent acquisition team	Responsibility for providing support to ensure the effective operation of this policy in the area of recruitment.

Person or group	Role
HR business partners	Responsibility for providing general support to ensure the effective operation of this policy. HRBPs may delegate their role to another member of the HR team or an external consultant. Responsibility for recording and reporting on breaches of this policy.
All line managers	Day-to-day responsibility for the effective operation of this policy.
All staff	Responsibility for ensuring their own compliance with the policy.

### ***Your responsibilities—What we expect from you***

- 3.1. We expect you, and everyone covered by this policy, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us, so creating the right environment is a responsibility that we all share.
- 3.2. We expect you to treat your colleagues and third parties (including and not limited to, funders, partners, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and creating a welcoming space for others to contribute.
- 3.3. We expect our staff to inform themselves of the experiences and preferences of people who are different from them. We require our staff to act with empathy—the Foundation will not tolerate the use of offensive, negative or inappropriate language towards people with a protected characteristic. This requirement includes, most acutely, refraining from the use of ableist, sexist or racist terms or jokes. Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is essential for ensuring inclusion, and this is not possible in a culture that allows inappropriate teasing or ‘banter’.
- 3.4. We encourage you to speak up in defence of the rights of others and if you are concerned that others are not acting in line with this policy. If you do not feel confident in doing so, you can raise the matter with your manager or a member of the HR team. By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture.
- 3.5. Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation or bullying as covered in our Anti-bullying and harassment policy.
- 3.6. To safeguard against the impact of unconscious bias and discrimination we require all staff to follow the Foundation’s processes for people management, particularly:
  - (a) recruitment,
  - (b) appraisals,
  - (c) promotion, and
  - (d) handling disciplinary and grievance procedures.

The HR operations team can advise you on required procedures and good practice as needed.

## 4. Breaches of this policy

- 4.1. If any of our staff or Trustees are found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary policy and procedure. In some jurisdictions, the courts can hold you personally liable for discrimination and harassment. If you need further information, please speak to the legal team.
- 4.2. Members of staff who would like to report a breach of this policy should contact their HRBP. Third parties who would like to report a breach of this policy should email 'legal@ifrs.org'.

## 5. Awareness and training

- 5.1. All staff must attend any mandatory diversity, equality and inclusion training provided by the Foundation.
- 5.2. Furthermore, we expect all our people to proactively support the diversity, equality and inclusion initiatives which the Foundation will arrange from time to time, by attending these events to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

## 6. Continuous improvement

- 6.1. This policy will be reviewed and updated at least every two years, and in line with requirements in the IFRS Policy Management Framework.

## 7. Linked policies

- Adoption policy
- Anti-bullying and harassment policy
- Data protection policy
- Disciplinary policy and procedure
- Grievance policy and procedure
- Health and safety policy
- Maternity policy
- Paternity policy
- Relocation from overseas to the UK policy
- Safeguarding and child protection policy
- Shared parental leave policy
- Sickness or other absence policy
- Whistleblowing policy