

Legal & General Human Rights Policy

Autumn 2020

“All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood”

United Nations Declaration of Human Rights



Legal & General

For over 180 years we have provided financial services to customers in the United Kingdom and, more recently, the United States, Asia and Europe.

Our longevity as an organisation is reflected in the long-term commitments we make to our customers and by the responsible way that we do business - Legal & General's 10,000 employees share a commitment to respect human rights.

A diverse range of people, doing their jobs well, responsibly and respectfully, is where respect for human rights begins. From the local master-builders creating new Affordable Homes in Wales to our pension-risk-transfer professionals in the United States, it is the responsible behaviour of our people, day-in and day-out, that creates a real culture of respect.

This document sets out how Legal & General, as a global organisation with ten million customers, respects human rights.

Scope

Legal & General's Human Rights Policy applies to all our employees worldwide, anyone doing business for or with Legal & General and others acting on our behalf. This applies to all locations where we conduct business and to all company-sponsored events.

The Policy

It is every Legal & General employee's responsibility to maintain a work environment that reflects respect for human rights and is free from all discrimination and harassment.

If any employee believes that someone, either in Legal & General or one of our suppliers or a contractor is violating this Human Rights Policy and/or the law, they are asked to report it immediately to their manager, Human Resources or through the company's whistle-blowing email/hotline.

We expect our suppliers and contractors to also have in place processes to enable their own staff to report any concerns.

Our commitment to human rights

Legal & General respect the human rights of our people and we expect those who work with us, to do the same. Being a responsible organisation means understanding that we rely on the societies we belong to and understanding that with big scale comes wider responsibility, beyond our organisation. We buy £776 million of goods and services every year from our suppliers and we expect them to share our commitment to human rights. As a company working to create new homes, new infrastructure and new communities, we must respect people who are affected by what we do.

International Standards

We support the principles set out in the following international standards:

- [United Nations \(UN\) Guiding Principles on Business and Human Rights](#)
- [International Bill of Human Rights](#)
- [International Labour Organisation's \(ILO\) Core Conventions](#)

Where appropriate, we are committed to engaging in dialogue with stakeholders and communities on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level.

We are committed to working collaboratively with suppliers, civil society, governments, and other businesses on human rights to inform our approach, share experiences and address root causes.



We will not tolerate, or condone, abuse of human rights within any part of our business or value chains and we will take seriously any allegations of human rights abuses. We aim to effectively remedy any negative human rights impact through the use of legal mechanisms, collaborative forums and company grievance mechanisms. As part of our commitment, we do not tolerate threats, intimidation, physical or legal attacks against people defending human rights.

Our commitment to customers

Legal & General operates in markets all over the world. We respect the rights of our customers by treating them fairly, listening to them and investigating their feedback and human rights considerations into our business processes, and the products and services which meet their needs.

Privacy

Our customers’ right to privacy is important as we manage large amounts of data as part of providing our products and services. We have policies, processes, and controls in place to ensure that customer data is managed in an ethical, lawful and responsible way.

Vulnerable customers

Our insight into the needs of vulnerable customers helps us to create products, investments and services which help people through difficult times. We work with charities and social enterprise experts to help guide us on how we can improve.

We can also make reasonable adjustments for customers with a disability under the Equality Act, under the term ‘Anticipation Duty.’ This is to ensure all our customers are treated fairly and feel supported in any way we can.

It’s important to us that all staff have sufficient training to support vulnerable customers effectively and sensitively. We ensure our communications can be adapted to our customer needs, for example whether they need it in Braille, large print or in audio format.

Dementia friends	Mental Health	Training
<p>Legal & General staff are offered a wide variety of training in this area to help better understand our customer’s needs. We have a number of Dementia Friends Champions who help deliver the training and support within the company.</p>	<p>We have trained over 100 mental health first aiders to help support staff and spot signs of mental health concerns. This support is invaluable to employees regularly talking to vulnerable customers to ensure we point them towards professional support.</p>	<p>We have increased the number of charity sector professionals, known as ‘critical friends’, who help us review our existing product, services, processes and innovate new products.</p>



Our people

Our people are what make Legal & General and so we have designed a corporate environment that is safe, respectful, open and designed to support ambition and excellence.

Through our interactions with our employees, and in our decisions on hiring, remuneration, training and promotion, we work hard to promote:

- Fair reward;
- Diversity
- Inclusion;
- Equal opportunities;
- Freedom of association, and
- Other human rights.

Our people policies prohibit any form of discrimination based on gender, sexual orientation, gender identity, marital status, family status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability.

We value the views of our employees and promote a collaborative, open and transparent communications environment which helps us maintain a healthy and strong workplace.

We provide learning environments and specific training about ethical behaviour and we require our people to behave in accordance with our Business Ethics Policy. Failure to comply with the Business Ethics Code may result in dismissal or other disciplinary action.

Freedom of Association and Collective Bargaining

We respect the right of our employees to join or not to join a trade union. Collective Bargaining is allowed and is/can be provided through negotiations with Legal and General's recognised Union, Unite.

We require our suppliers and contractors to respect their employees' right to freedom of association. If operating in the UK or anywhere else where local rights to collective bargaining exist, we require suppliers and contractors to allow this.

Diversity and Inclusion

As an organisation, we are committed to providing a safe and inclusive working environment where all of our people are treated fairly and with respect.

The group board is responsible for overseeing the implementation of our group-wide diversity and inclusion policy. The policy applies to all of those people directly employed by Legal and General Group plc and it forms the basis of our engagement with our clients, suppliers and other third-party providers.

Diversity and inclusion standards

- We will be fair and transparent, and treat our people with integrity and openness. We will be respectful of differences and we will not tolerate behaviour that marginalises, disadvantages or devalues others.
- We will aim to build a workforce that reflects the diverse communities we serve. We are committed to creating social value and being led by the needs of our customers. We will invest in our hiring processes so we can attract a more diverse pool of people, and we will tackle barriers that prevent us from attracting and retaining more diverse talent.
- We will create an inclusive environment where people feel comfortable sharing their opinions and feel like they belong. We will encourage our people to embrace difference, to listen to other points of view, and work together to achieve the best outcome.
- We will ensure that everyone across Legal & General Group understands their responsibilities in driving an inclusive and diverse culture and the opportunities it can bring. We will develop a robust governance framework and use data and insights to shape our actions, measure our progress, and drive accountability.

Our suppliers

We use a due diligence process to evaluate and select suppliers which includes asking them to disclose their human rights policies as part of our selection criteria. Suppliers are asked to agree to, and sign, our 'Supplier Code of Conduct Behaviour', which covers the environment and ethical business conduct, as well as human rights, including the prevention of modern slavery and the protection of children's' rights.

Specifically, we support the protection of human rights, in our supply chain, by encouraging behaviours and actions that are consistent with International Labour Organisation (ILO) Core Conventions and by using suppliers whose values are consistent with ours. We also comply with The Modern Slavery Act 2015 (MSA) and require our suppliers to do the same. We will work with our suppliers to improve and evolve human rights practices.

We require all suppliers to uphold minimum commitments relating to labour standards. These standards should meet the four 'core' ILO conventions on labour rights:

- Freedom of association and the effective recognition of the right to collective bargaining
- The elimination of all form of bonded labour and compulsory labour
- The effective abolition of child labour
- The elimination of discrimination with respect to employment and occupation

Our suppliers should provide a working environment in which employees do not suffer from harassment, verbal, visual, physical abuse or any conduct that creates an intimidating, offensive or hostile workplace. It is the responsibility of our suppliers to ensure that they only employ people with a legal right to work in that country.

As a minimum, our suppliers must comply with all applicable minimum wages, benefits and working hours' standards. Short term or temporary contracts should not be used to avoid providing full employee benefits for low wage workers.

We require that any employees of any supplier providing goods or services on our UK premises are paid the UK living wage (as outlined by the Living Wage Foundation <http://www.livingwage.org.uk/>) as a minimum.

Human rights

Forced Labour (Modern Slavery)

Modern Slavery is a violation of fundamental human rights and Legal & General operates a zero-tolerance policy. Specific policies regarding modern slavery, and a 'Modern Slavery Statement', set out our commitments and the business's responsibilities (please refer to the "related policies and information" section of this document). We require our suppliers and contractors to comply with all applicable local legislation as well as adhering to our Supplier Code of Conduct.

Child Labour

Throughout all the countries we operate in we comply with all relevant legislation regarding child Labour. We do not employ people under the age of 18 in any hazardous role or at night. We do not tolerate the use of child labour and require that our suppliers do not use children in their operations or their value chains.

Health and Safety

We are committed to providing a safe and healthy working environment for our employees and people affected by our operations or activities; and understand the importance of this to both employees and other stakeholders.

We believe in always doing the right thing and in doing it safely, without unnecessary risk to people's health and we comply with all relevant legislation.

Our 'Health and Safety Policy', sets out our commitments and responsibilities. We require our suppliers and contractors to comply with all applicable legislation as well as adhering to our 'Supplier Code of Conduct'.

We are committed to proactive management of health and safety to ensure continual improvement and development in performance. We set targets and review them annually to improve safety and performance.

Human rights

Labour rights

We provide fair working conditions for our employees and we comply with all applicable legislation. We require our suppliers and contractors to comply with all applicable local legislation as well as adhering to our 'Supplier Code of Conduct', which contains our commitment to the Ethical Trading Initiative (ETI) Base Code.

Wages

Legal & General is committed to ensuring that our direct employees are not paid lower than the Living Wage Foundation Living Wage, this includes all contractors working within our offices. We request that our suppliers apply the Living Wage Foundation Living Wage and require our suppliers to comply with all applicable legislation or, if there is no applicable local law in the country in which they operate, ensure that their pay will not be less than the level paid generally within that industry.

Governance

We want to ensure that every part of our business, and every one of our people, is clear about our responsibility to respect human rights.

The emphasis we place on respect for human rights is demonstrated by board-level oversight through the Group Risk Committee which also includes oversight of the Modern Slavery strategy.

Our work in this area is overseen by the Executive Committee which includes Nigel Wilson, Chief Executive Officer, the Group Human Resources Director, the Group General Counsel & Company Secretary, all business Chief Executive Officers, the Group Chief Risk Officer, the Group Corporate Affairs Director and the Group Chief Internal Audit Officer.

Remedy

We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms.

We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels.

We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns.

We also promote the provision of effective grievance mechanisms by our suppliers.

Human rights

There are some of the most relevant policies, business standards, and other governance papers in relation to our Human Rights Policy.

- [Modern Slavery Transparency Statement](#)
- [Group Code of Ethics](#)
- [Group Environmental policy](#)
- [Group Datacentre](#)
- [Build Back Better, Corporate Responsibility Report 2019](#)
- [Women in Finance](#)
- [Health and Safety Commitment](#)
- [Gender pay gap report](#)
- [Board diversity and inclusion policy](#)
- [Supplier Code of Conduct](#)

Human Rights

- [UN Global Compact](#) (Signatory)
- [UK Living Wage](#) (Employer)
- [30 percent club](#)
- [Stonewall](#) (Signatory)
- [Women in Finance](#) (Signatory)
- [Diversity Project](#) (Advisory and Steering Group members)

Collaborative bodies

- [Better Buildings Partnership](#)
- [IMMFA](#)
- [INREV sustainability committee](#)
- [Transparency International Business Integrity Forum Members](#)
- [UK Green Building Council](#)
- [Principles for Responsible Investment](#)