



## Policy - Diversity, Equity & Inclusion Policy

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**Policy Category:** Code of Conduct – Employee Expectations

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### Purpose

To outline London Hydro’s ongoing commitment and efforts towards fostering a corporate culture and climate that values and supports a diverse, equitable and inclusive organization.

### Scope

This policy applies to Board members, employees, and employees of a contracted service and to London Hydro’s dealings with suppliers, vendors, clients, customers and members of the public. This policy applies to all work locations, all work, all work-related activities (including off-site business functions such as external training courses, conferences, events, customer/client locations and trade shows) and all company-sponsored social events.

Violation of this policy may result in discipline up to and including discharge for just cause, or termination of contract.

### Policy Statement

London Hydro is committed to fostering a corporate culture and climate that values and supports a diverse, equitable and inclusive organization, and which is aligned with and reflective of our corporate values of Safety, Employees, Customers, Integrity, Agility, and Sustainability.

Our commitment will be demonstrated through ongoing efforts to:

- Foster a positive culture of belonging, where the uniqueness, individual differences, perspectives and skills of every individual are appreciated, valued and protected
- Expand/maintain the depth and breadth of our skilled workforce
- Be cognizant of and seek to eliminate systemic barriers and bias
- Comply with pay and employment equity requirements
- Maximize employee engagement and retention
- Establish external stakeholder engagement practices that reflect an awareness of and respect for the diversity of the community that we serve.

- Communicate the benefits that diversity, equity and inclusion bring to our workplace and community

Through concerted and intentional action, we will strive to continually improve how our corporate culture supports diversity, equity and inclusion. We will set clear goals, and will measure and monitor our progress towards meeting them. Over time we will strive to achieve sustained excellence in our diversity, equity and inclusion practices.

## Responsibilities

### *Executive Sponsorship / Commitment / Governance / Oversight*

- Develop and implement policies, protocols, programs, and initiatives in support of this policy
- Ensure appropriate diversity, equity and inclusion educational opportunities are in place
- Ensure that all supervisors understand the relevant policies and are accountable to ensure their direct reports are upholding the policy
- Set goals, evaluate, and measure diversity, equity and inclusion results and progress, with a goal of continuous improvement

### *Human Resources*

- Monitor, measure and provide insights regarding the implementation of diversity, equity and inclusion policies, protocols, programs, and initiatives
- Assist in the development and review of diversity, equity and inclusion goals and metrics
- Confidentially and transparently collect, maintain and analyze demographic / diversity profile data/statistics across the internal stakeholder groups, business units, and organizational hierarchy
- Solicit feedback from employees to measure the efficacy of diversity, equity and inclusion initiatives
- Address/investigate any diversity, equity and inclusion concerns raised, as reasonable in the circumstances
- Communicate diversity, equity and inclusion plans and progress through established London Hydro communication channels

### *Management*

- Ensure that employees are provided with the education required to understand, support and embody diversity, equity and inclusion principles
- Foster a diverse, inclusive and equitable work environment

### *Employees*

- Adopt and uphold all diversity, equity and inclusion specific policies, protocols, programs, and initiatives
- Actively contribute to an inclusive and welcoming work culture

## Policy Principles

### 2. Remuneration / Pay Equity

- Adhere to relevant legislation with respect to pay equity (the *Pay Equity Act*) and equal pay for equal work (the *Employment Standards Act*).
- Determine compensation using an objective approach, taking into consideration contractual commitments (e.g. collective agreement for unionized employees).

### 3. Recruitment and Talent Attraction

- Implement strategies and tactics towards attracting a diverse pool of qualified candidates for employment opportunities.
- Provide equal treatment in employment without discrimination based on the protected grounds of the Ontario *Human Rights Code*.
- Hire and promote employees based on their qualifications and competencies, taking into consideration contractual commitments (e.g. collective agreement for unionized employees).

### 4. Inclusion and Retention

- Implement and promote strategies, programs, initiatives and tactics that promote and ensure a diverse, positive, and inclusive workplace culture and an engaged workforce.
- Create opportunities for employees to participate in the development and prioritization of corporate initiatives.
- Solicit feedback from employees to measure the efficacy of diversity, equity and inclusion initiatives.

### 5. Education (Training / Orientation & Onboarding)

- Implement training programs and ensure appropriate orientation / onboarding materials and corporate resources related to diversity, equity and inclusion.

### 6. Stakeholder Engagement and Outreach

- Engage in outreach with community organizations (e.g. associations, institutions, suppliers and identified interest groups) in support of diversity, equity and inclusion initiatives.
- Encourage external suppliers to prioritize diversity, equity and inclusion in their business practices.

## Definitions

### *Diversity*

Diversity refers to the variety of similarities and differences among people, often called diversity dimensions, including, but not limited to: citizenship, race, place of origin, ethnic origin, colour, ancestry, disability, age, creed, sex/pregnancy, family status, marital status, sexual orientation, gender identity, gender expression, Indigenous identity, generation, culture, appearance, language and accent, mental health, education, geography, work style, work experience, job role and function, thinking style, and personality type. Representation of various diversity dimensions within organizations may vary by geography, time, or organization. *{The Centre for Global Inclusion / Ontario Human Rights Commission}*

### *Equity*

Fairness, Impartiality. A distinct process of recognizing differences within groups of individuals, and using this understanding to achieve substantive equality. *{Ontario Human Rights Commission}*

Equity is about fairness and justice. It is about taking deliberate actions to remove systemic, group, and individual barriers and obstacles that hinder opportunities and disrupt well-being. Equity is achieved through the identification and elimination of policies, practices, attitudes, and cultural messages that create and reinforce unfair outcomes *{The Centre for Global Inclusion}*

### *Inclusion*

Appreciating and using our unique differences in a way that shows respect for the individual and ultimately creates a dynamic multi-dimensional organization. *{Ontario Human Rights Commission}*

Inclusion is a dynamic state of feeling, belonging, and operating in which diversity is leveraged and valued to create a fair, healthy, and high-performing organization or community. An inclusive culture and environment ensure equitable access to resources and opportunities for all. It also enables individuals and groups to feel safe, respected, heard, engaged, motivated, and valued for who they are. *{The Centre for Global Inclusion}*

### *Bias*

A predisposition, prejudice or generalization about a group of persons based on personal characteristics or stereotypes. *{Ontario Human Rights Commission}*

### *Discrimination*

Unfair, unequal or different treatment that causes harm based on protected grounds under the *Ontario Human Rights Code* (citizenship, race, place of origin, ethnic origin, colour, ancestry, disability, age, creed, sex/pregnancy, family status, marital status, sexual orientation, gender identity, gender expression, and record of offences). *{Ontario Human Rights Commission}*

## **Applicable Legislation**

This policy will be administered in compliance with any and all applicable legislation. Including but not limited to:

- Accessibility for Ontarians with Disabilities Act (AODA)
- Occupational Health & Safety Act (OHSA)
- Ontario Human Rights Code (OHRC)
- Ontario Labour Relations Act (OLRA)
- Ontario Pay Equity Act
- Ontario Employment Standards Act

## **Related Information (Not an exhaustive list)**

- COR-HR-200045.01 Harassment and Violence Prevention Policy and Program