

The Scottish National Investment Bank



Our Values







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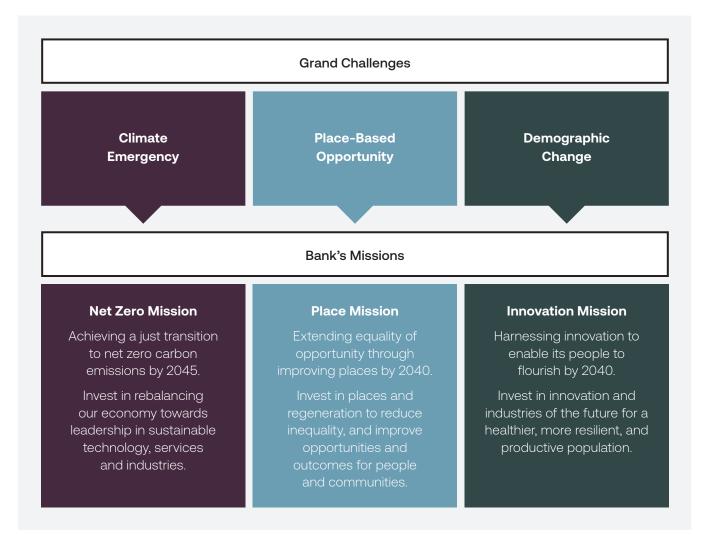
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Introduction to the Bank

The Scottish National Investment Bank is Scotland's first development bank, established in 2020 to deliver patient, mission-impact investment to businesses and projects connected to Scotland. Through these investments the Bank will play an important role in helping to address the 'grand challenges' facing Scotland, namely the climate emergency, place-based equality of opportunity, and a changing demography.

These grand challenges were used to define and set the Bank's three missions during its creation:



In addressing its three missions the Bank must also address inequality in Scotland, and pursue equality, diversity and inclusion within the organisation, through its investments, and via its supply chain. There is substantial and continually mounting evidence that a more equal society is a more prosperous society; it is not just better for overall wellbeing and quality of life, but also makes strong economic sense. Without better equality, the Bank's missions – those that reflect the grand challenges facing Scotland – are unachievable.

The Scottish National Investment Bank Act sets out a requirement for the organisation to directly address and advance gender equality. In developing this Strategy, however, we have extended the scope to target better equality across all its forms. This reflects our belief in a fairer, more equal society for all in Scotland. The legislative framework that this Strategy has been developed in accordance with is set out in further detail in Appendix B.



Our Ambition

The Bank has the ambition to contribute to greater equality, diversity and inclusion both within the organisation itself and through its external engagement. When we talk about equality, we mean creating a fairer society where everyone has equal opportunity. Diversity is recognising, valuing and respecting each other's differences, and Inclusion is about an individual's experience and creating an environment where everyone feels valued and included.

By representing Scotland in all its diversity, the Bank will be better placed to foster greater economic growth and actively promote equality for all in Scotland. We have considered what this means in practice through the lens of how this can be delivered via our missions:

Net Zero Mission

Ingoing context

Scotland's economic transition to a net zero economy will require fundamental change to the way we look at:

- Business and industry (including ways in which the just transition can enable greater equality)
- Employment opportunity (including the types of jobs that support Fair Work and a just transition)

The scale and speed of change needed creates a real opportunity to make transformational progress in equality.

Place Mission

Ingoing context

Addressing inequality lies at the heart of the Bank's place mission. There is a focus on socio-economic inequality as well as a broader recognition that place-based equality must address access, employment opportunity, infrastructure (including digital), the backgrounds and status of potential investees, and other factors that can 'level up' across Scotland's rural and urban landscapes.

Innovation Mission

Ingoing context

There is widespread acknowledgment that Scotland's innovation and technology sectors do not currently reflect the country's diversity and entrepreneurial skills. Increasing diversity is central to ensuring Scotland can be a world-class centre of innovation. The Bank can play a role (alongside other agencies, the educational sector and public policy) in working with investees to ensure they have appropriate policies and practices that increase equality of opportunity over time.

Our ambition

Our net zero investments will specifically and proactively consider how the just transition can be leveraged to support and enable equality.

Our ambition

investments consider the extent to which we can reduce inequality based on specific opportunity – for example, increased rural connectivity and employment, or increased access to affordable housing

Our ambition

Our innovation-focused investments consider the diversity of investees (from Board to workforce), and how our investments can leverage more ambitious thought and action on increasing diversity and equality.



Our Ambition continued

Today, we recognise that there remains significant work to do for the Bank to address the need for equality, diversity and inclusion within its own operations, through its investment activity, and via its supply chain. We acknowledge that the ambitions behind our Equality Strategy will take time to come to fruition, and that success will require ongoing, continuous focus and effort.

To reflect this, the Bank considers this to be a 'live' Strategy, and we will continue to learn through delivery and education over the coming period. As the Bank is in its formative years, the Strategy will be revisited in 2 years' time to ensure it reflects the Bank's growing understanding of how it can actively address the core issues and be progressive through its activities.

As part of this ongoing process, we keenly welcome the input and collaboration of external parties. To that end, we will be setting up roundtables to hear voices, perspectives, barriers, and challenges from across diverse groups, actively seeking feedback on how we can improve.

Our Approach

The Bank's Equality Strategy will be delivered across three broad areas:



In this document we expand on each of these areas in turn, looking at our ambition and how we plan to keep improving. There is also further information in Appendix A for how we will measure, monitor, and report on our progress to ensure we are informed by evidence at every stage.



Section 1 - Bank Internal Composition and Culture

The Bank is uniquely positioned to use its missions to inspire people to join its team. Alignment to the Bank's missions and values is a critical component in the Bank's recruitment process. The Bank supports the adoption of fair work practices including action to tackle the gender pay gap and to create a more diverse and inclusive workplace.

Our ambition

Team

The Bank's ambition is for the team to reflect the full diversity of our society, bringing diversity of thought which reflects the people of Scotland. This includes:

- A team of people from a wide range of backgrounds who are passionate about our purpose.
- Diversity at all levels of the Bank.
- A diverse leadership team that influences change, is visible and passionate about inclusion.
- Individuals who are passionate about equality, diversity and inclusion.
- People who value difference and want to learn from a variety of perspectives.

Culture

By creating an inclusive culture where difference is embraced and our talent can flourish, the Bank can play a full role in promoting greater equality, to the benefit of people across Scotland.

In doing this, the Bank will seek to:

- Identify new and creative practices and standards, seek out different perspectives and provide a safe, and truly
 collaborative space for new ideas.
- Provide a flexible and supportive environment which is led and championed by inclusive leaders.
- Get to know individuals, taking account of their views, experiences and ideas, and actively look for ways to expand our perspectives, educate ourselves and learn from others.
- Challenge one another in a respectful way to arrive at the best decisions.



Section 1 - Bank Internal Composition and Culture continued

Where we are today

The Bank is incredibly proud of the team it has established since the Bank's launch, in particular the overall gender balance of the Bank's team and notably the Board and Executive Team.

As of 31 March 2022 the Bank has built a strong, experienced team of 61 people. The Bank will continue to focus on where we are under-represented and where we most need to improve. When we consider diversity specifically by employment grade and job family, we have identified the following areas of focus based on our current diversity monitoring (see Appendix A):

Gender Balance and Gender Pay Gap

Overall the Bank has a good gender balance with females representing 47.5% of employees and 66.6% of the Bank's Executive Team. However, despite our approach to achieving gender balance in hiring the Bank team, we still have a mean gender pay gap of 21.9% and a median gender pay gap of 28.0%. The Bank's gender pay gap is reflective of the Bank having a higher number of males in senior investment positions and a higher number of females in more junior positions. This continues to be a consistent challenge across the financial services and investment sectors more broadly. The median gender pay gap within the Financial Services Sector in the UK is 36.5%.¹ In Scotland the national gender pay gap for all jobs in 2021 was 11.5%. The Bank's medium-term aspiration is to be more in line with the 'All Scotland' benchmark.

The Bank is focussed on improving under-representation of women in senior investment roles and leading the way for industry change. We will do this by working with industry experts to understand the barriers and taking a progressive approach to our people plans with specific focus on developing female employees towards senior investment roles. As part of our focus on addressing the gender pay gap, the Bank reports pay gap data on a quarterly basis to the Bank's Remuneration and Nominations Committee and will publish this data annually.

Ethnicity

9.1% of the Bank team is of an ethnic minority. Currently there is no ethnic diversity at Executive Director level. The Scottish Government estimated 4.6% of the population to be minority ethnic in 2018.² The Bank will continue to increase opportunities to improve ethnic minority representation across the Bank and specifically improve ethnic diversity in our senior grades.

^{1.} Source: Office for National Statistics, May 2022 (ons.gov.uk).

^{2.} Source: Scottish Surveys Core Questions. https://scotland.shinyapps.io/sg-equality-evidence-finder/



Section 1 - Bank Internal Composition and Culture continued

Socio-economic background

The Bank has hired a team from a range of socio-economic backgrounds with 78.2% having attended a state-run or state-funded secondary school. Data shows that c.4% of the population in Scotland attended an independent school. The Bank will continue to improve social mobility by providing greater access and opportunity for people from socially diverse backgrounds.

Disability

1.8% of the Bank team consider themselves to have a disability. The Bank will increase focus and opportunities for individuals with different needs due to a disability or long-term illness and become a Disability Confident employer.

Sexual orientation

3.6% of the Bank's team reported as identifying as LGBTI; this is the same proportion as in the general population.² The Bank will support positive action programmes to provide an inclusive environment for all.

The Bank will report on diversity annually with results published on the website: www.thebank.scot. There are also further statistics on the Bank's current diversity in the appendix.

^{1.} Source: SICS. Facts & Figures » SCIS

^{2.} Source: ONS, 2020 release. Sexual orientation, UK - Office for National Statistics (ons.gov.uk)



Section 1 - Bank Internal Composition and Culture continued

Actions we are undertaking

The Bank will champion equality for all, embedding it into its culture, and will seek to improve all aspects of diversity and inclusion whilst prioritising areas where we are under-represented.

The Bank will review these priority objectives regularly to ensure we continue to focus on the key issues. For more information, please refer to our Outcomes document in Appendix D.

Improve equality and diversity of the Bank team

- 1. **Increase our knowledge:** broaden the Bank's external networks and develop partnerships to learn from experts and bring greater understanding, insights and best practice to the Bank.
- 2. **Recruitment Principles:** complete an assessment of the Bank's approach to the recruitment and development of our team to identify priority areas for action and opportunities.
- 3. **Benchmark employment practices:** complete an audit in partnership with an external expert of our broader employment practices to identify priority areas for action and opportunities to improve.
- 4. Develop internal talent: identify and support under-represented groups to achieve their career goals.
- 5. **Future talent:** work with local organisations who support youth social mobility to provide opportunities for placements and apprenticeships to groups which are under-represented.

Create an inclusive environment

- 1. **Culture:** colleagues from across the Bank will continue to be performance-measured on their contribution to the embedding of the Bank's culture and values to improve diversity and equality.
- 2. **Inclusive leaders:** educate and develop leaders on how to create an environment that values equality, diversity and inclusion.
- 3. **Educate ourselves:** foster a learning culture where individuals seek out ways to increase their knowledge and awareness on subjects relating to equality, diversity and inclusion, and where they are clear on how to actively pursue and promote it.
- 4. **Employee network groups:** support our people to create employee network groups, with learnings from these groups providing input into our policies and processes.
- 5. **Recognise and champion inclusive behaviours:** recognise our diversity and inclusion role models so others can learn from them.
- 6. Influence others: share the Bank's insights and experiences externally to support positive change.



Section 2 – Investment in Businesses and Projects; Equal Access to Investment

The Bank invests in a continually expanding portfolio of companies and projects, spread across our three missions.

The Bank already supports the adoption of fair work practices through its investment and will continue to encourage the adoption of fair work criteria in the businesses and projects in which it invests, doing so in a practical and proportionate manner. This includes building awareness of the need to tackle the gender pay gap and create more equal, diverse, and inclusive workplaces.

Actions we are undertaking

Within our investments

As part of its formal due diligence processes, the Bank will collect equality, diversity and inclusion information and practices in the projects and businesses it considers investing in and where relevant make recommendations for change. Where appropriate the Bank will require more ambitious and impactful approaches to equality using loan covenants, shareholder rights and other mechanisms that help to increase capacity and commitment to improving business practices in Scotland. The Bank has the privilege of working with many businesses that are in the early stages of their growth, providing crucial investment that can ultimately contribute to addressing key societal challenges. The Bank will work with these businesses to share and instil positive practices that support equality. The application of equality covenants will be proportionate and relevant, whilst providing directional guidance and support to agree standards that will positively influence change. As a minimum these covenants will include:

- 1. Reporting of diversity data.
- 2. Review of Equality, Diversity and Inclusion policies.
- 3. Requirement to put a plan in place to increase equality of opportunity as well as diversity and inclusion where appropriate.
- 4. Monitoring progress of agreed actions.

The Bank will also look to include appropriate covenants within its investments to ensure that the businesses and projects in which it invests are held accountable to deliver positive impacts, by, in part, developing credible plans to improve equality and diversity. As an equity investor we also typically have observer rights on investee boards, which we will often be able to exercise in order to raise issues and influence direction where necessary.

Addressing access to finance

There is a role for the Bank not just through the investments it makes, but also in how it supports the promotion and delivery of equality in business. This includes actions such as:

- 1. Continuing work with Investing Women Angels (IWA) to develop the concept and plans for a new fund to support the growth of female-founded businesses across Scotland.
- 2. Researching the barriers to equal access to investment to directly inform activities across the Bank.
- 3. Development of thought leadership that provide under-represented groups with information and case studies on ways to overcome the barriers faced.
- 4. Hosting roundtables with representatives of different groups to hear perspectives, identify barriers and co-create solutions.



Section 3 - Suppliers Engaged by the Bank

As a public purchaser of goods and services, the Bank also has the ability to influence the drive towards greater equality, diversity and inclusion through our supply chain.

Our ambition

The Bank will encourage the suppliers that it engages with to develop appropriate equality policies and practices where they are not already in place. For more information, please refer to our Outcomes document.

Some of the potential suppliers across the Scottish economy that the Bank will work with and support are SMEs. The Bank will therefore seek to agree appropriate equality covenants into its contracts which balance giving smaller organisations the opportunity to bid whilst still encouraging the advancement of equality. Relevant award criteria and conditions will be considered in relation to regulated public procurements in support of the Bank's obligations under the Public Sector Equality Duty.

Actions we are undertaking

The Bank already supports the adoption of fair work practices and will include the adoption of fair work in the assessment criteria for the awarding of contracts where practical and proportionate.

For all regulated public procurements, where appropriate and relevant to the contract, the Bank will work with suppliers to help improve equality by agreeing:

- 1. Equality, diversity and inclusion reporting
- 2. Reporting content
- 3. Reporting frequency



Appendix A - Measurement, Monitoring and Reporting

In order to understand whether we are making progress against our ambitions, we will undertake a programme of regular measurement, monitoring and reporting.

In this section we set out our approach within each of the three focus areas.

Internal organisation composition and culture

- 1. Comprehensively monitor diversity through surveying applicants to the Bank, and employees when they join, to gather key data required to support reporting and analysis.
- 2. Use our Team Voice and Employee Survey staff voice tools to gather feedback on key enablers such as flexible working.
- 3. Discuss gender pay gap figures at quarterly Board meetings.
- 4. Publish gender and ethnic minority pay gap reports regularly alongside plans for ongoing improvement.

Investment in businesses and projects

- 1. The Bank will gather data and information from the businesses and projects it invests in, including, where applicable, the diversity data of their Board, Executive Team and workforce, and the company's approach to equality, diversity and inclusion.
- 2. Through on-going portfolio engagement, the Bank will support the evolution of working practices to help drive positive change and promote a culture within the Scottish investment ecosystem that values equality, diversity and inclusion, and the creation of high-quality, fair employment.
- 3. Over time the Bank's monitoring activity will inform the Bank's approach to equality through the identification of gaps and trends. These trends will be considered within the Bank's impact reporting.

Suppliers engaged by the Bank

1. Regular review of supplier equality, diversity and inclusion reporting.



Appendix B - Legislative Context

The Bank's Equality Strategy has been developed in accordance with the following:

- The Scottish National Investment Bank Act (2020) ("Bank Act");
- ◆ The Shareholder Relationship Framework Document ("Shareholder Framework");
- ◆ The Equality Act 2010 ("Equality Act"); and
- ◆ The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 ("Regulations").

As a non-departmental public body, the Bank is subject to the Public Sector Equality Duty (PSED), set out in the Equality Act and Regulations, which apply to the bank and requires it to have due regard to:

- (i) eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act;
- (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- (iii) foster good relations between people who share a protected characteristic and people who do not share it.

The PSED covers the following eight protected characteristics:

- Disability
- Sex
- ◆ Race
- Age
- Gender reassignment
- · Religious belief
- Sexual orientation
- Pregnancy and maternity

The Bank was established under the Bank Act, which sets out additional requirements and actions necessary to advance gender equality. This includes reporting to the Scottish Parliament on how the Bank has fulfilled the requirements of its gender equality strategy, which is incorporated within this Equality Strategy.

The Bank welcomes the requirements under the PSED and the Bank Act. The Bank will ensure all employees are educated on public sector equalities legislation, develop their knowledge of inequalities in the Scottish population, and understand the barriers to delivering equality. This will help us to ensure that the Bank is considering equality in all of its business activities. As part of this, we seek to also understand and consider intersectional issues as they relate to the Bank, its activities, and the wider economy. Intersectionality is recognising that people's lives are often shaped by many factors, rather than just one. Many people have overlapping protected characteristics, meaning they may experience discrimination in more or different ways. The Bank will welcome input and collaboration with groups to help evolve our thinking and action on intersectional challenges.

The Bank will publish its equality outcomes and report on the equality duty. The Bank will also publish data on equal pay and gender pay gap as it relates to its operations. This will be in accordance with the Legislative Framework.



Appendix C - Bank Diversity Statistics

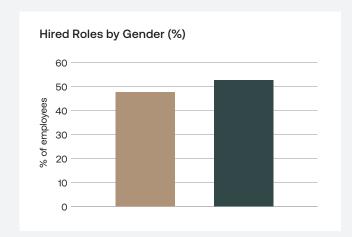
Diversity in the Bank as at 31 March 2022 is summarised below.

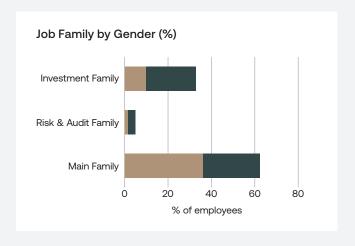
Gender Balance

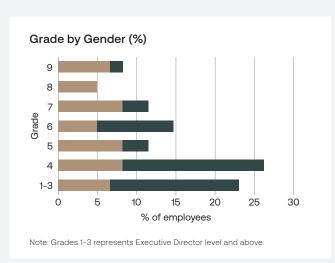
Gender representation in the Bank is:

	Female	Male
Board	50.0%	50.0%
Executive Committee	66.7%	33.3%
All Employees	47.5%	52.5%

In comparison to Financial Services in the UK, in the period October to December 2021 42.7% of people employed in 'financial & insurance activities' are female, 57.3% are male (source: Labour Force Survey).











Appendix C - Bank Diversity Statistics continued

Gender Pay Gap

The gender pay gap is an equality measure that shows the difference in average earnings between women and men. To more fully illustrate this, both the mean and median figures are used. The mean gender pay gap figure gives the average difference in earnings. However, it can be distorted by the presence of higher or lower salaries. We therefore also report on median gender pay gap which is not skewed by outlier high or low salaries.

The mean gender pay gap as at 31 March 2022 is **21.9% (in favour of male)**. When salaries are separated by gender and averaged, males at the Bank earn 21.9% more than females.

The median gender pay gap at the same date is **28.0% (in favour of male)**. When salaries are separated by gender and sorted highest to lowest the 'middle' male salary is 28.0% higher than the 'middle' female salary.

In UK Financial Services the national mean gender pay gap in 2021 is **33.2% (in favour of male)** and the median gender pay gap is **36.5% (in favour of male)** (Source: ONS 6 May 2022).

In Scotland the national mean gender pay gap for all jobs in 2021 is 10.1% (in favour of male) and the median gender pay gap is 11.5% (in favour of male) (Source: ONS 6 May 2022).

	UK Financial Services	Scotland (all jobs)	The Bank
Mean GPG	33.2%*	10.1%*	21.9%*
Median GPG	36.5%*	11.5%*	28.0%*

The gender pay gap figures reflect:

- A higher number of females in more junior positions at Grades 7-9
- ◆ A higher number of males in senior Investment Family roles at Grade 3 and 4

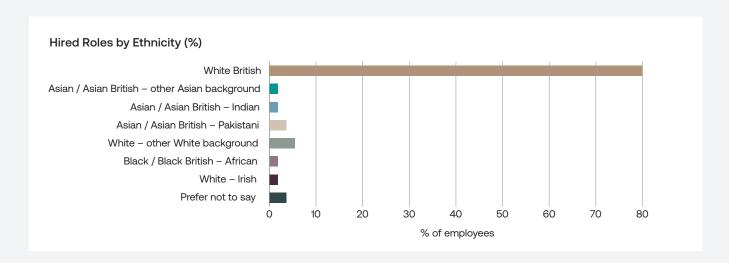


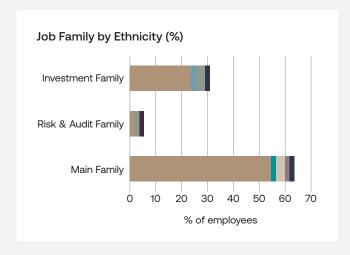
Appendix C - Bank Diversity Statistics continued

Ethnicity

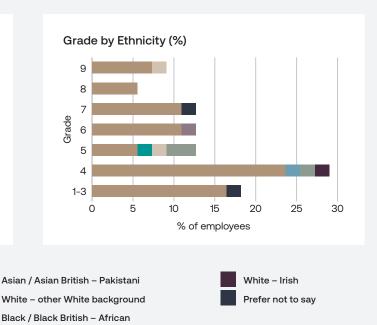
The Scottish Government estimated 4.6% of the population to be minority ethnic in 2018.1

9.1% of the Bank team is of an ethnic minority. Currently the Bank has no reported ethnic diversity amongst grades 1-3 or on the Bank's Board.





Asian / Asian British - other Asian background



White British

Asian / Asian British - Indian

^{1.} Scottish Surveys Core Questions. https://scotland.shinyapps.io/sg-equality-evidence-finder/

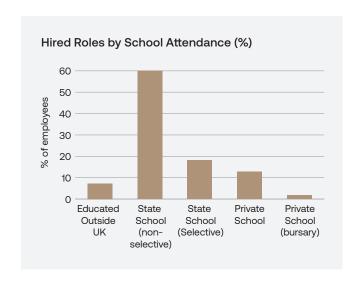


Appendix C - Bank Diversity Statistics continued

Socio-economic background

78.2% of the Bank's team attended a state-run or state-funded school.

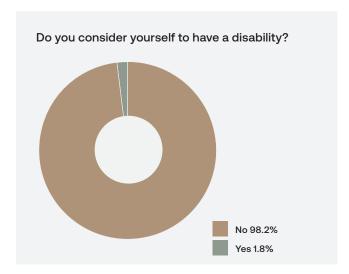
Data shows that c.4% of the population in Scotland attended an independent school.¹



Disability

Currently 1.8% of the Bank team consider themselves to have a disability.

The 2011 census found that 19.6% of people said their day-to-day activities were limited by a long-term health problem or disability.

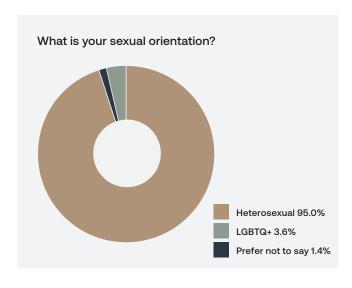


Sexual Orientation

3.6% of the Bank's team currently report as identifying as LGBTQ+. This is the same proportion as in the general population.²



^{2.} Source: ONS, 2020 release. Sexual orientation, UK - Office for National Statistics (ons.gov.uk)





Appendix D - Equality Outcomes

Introduction

The Bank's Equality Strategy has been developed in accordance with the following:

- The Scottish National Investment Bank Act (2020) ("Bank Act");
- ◆ The Shareholder Relationship Framework Document ("Shareholder Framework");
- ◆ The Equality Act 2010 ("Equality Act"); and
- The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 ("Regulations").

The Bank was established under the Bank Act which sets out requirements and actions the Bank is required to take to support gender equality, such as reporting to the Scottish Parliament on how the Bank has fulfilled the requirements of its gender equality strategy, which is incorporated within this Equality Strategy.

The Equality Act establishes the Public Sector Equality Duty, which requires public bodies such as the Bank to have due regard to the need to:

- (i) eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act
- (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it
- (iii) foster good relations between people who share a protected characteristic and people who do not share it.

The Regulations apply to the Bank and set out the Public Sector Equality Duty in greater detail for Scottish public authorities.

The Bank's initial equality outcomes set out high-level, strategic goals that aims to drive the Bank's development as an organisation that genuinely values equality and diversity.



Appendix D - Equality Outcomes continued

Outcome 1	Positive impact on equality in Scotland through the Bank's investments and improved equal access to investment.			
Aim	The Bank will encourage the businesses and projects it invests in to improve equality and diversity and will influence others to promote the advancement of equality, diversity and inclusion in the Scottish economy.			
Objectives	 To educate all employees in the Bank on public sector equalities legislation and develop their knowledge of inequalities in Scotland. Equalities considerations are included in all business activities. 			
	2. To promote equality, diversity and inclusion through investment and due diligence activity, and where appropriate support businesses and projects in receipt of Bank investment to develop appropriate Equality and Diversity policies and practices through the use of investment covenants and reporting requirements.			
	3. To collect and report on equality and diversity data from the businesses and projects the bank has invested in, which may include the diversity data of their Board, Executive Team and workforce, and the company's approach to equality, diversity and inclusion.			
	4. To establish methodology for measuring equality impact.			
	5. To undertake research and build engagement with external partners to understand potential barriers and identify opportunities that seek to improve equal access to investment for those who are typically under-represented within the Scottish investment landscape.			
	6. To use the Bank's learning to build an evidence base which informs activities across the Bank and promotes better practices within the wider investment eco-system through the publication of equality insight articles to share the Bank's learnings.			
Outcome 2	Improve diversity of the Bank Team			
Aim	Improved diversity across the organisation as a result of the Bank's employment practises.			
Objectives	 Increased knowledge: Draw on external networks and partnerships to bring learning, insight and best practice into the Bank; increased understanding of barriers. 			
	2. Recruitment principles: The Bank's recruitment guidelines emphasise equality and diversity as key criteria for selection.			
	3. Employment practises: The Bank's employment policies and procedures enable opportunities to improve equality and diversity.			
	4. Development of internal talent: support for under-represented groups to achieve their career goals.			
	5. Future talent: Opportunities for placements and apprenticeships provided to under-represented groups in partnership with local organisations.			
	6. Monitoring and transparency: Diversity of the Bank team monitored to gather key data required and use appropriate benchmark data to support reporting and analysis. Gender and ethnic minority pay gap reports published regularly alongside plans to address any gaps.			



Appendix D - Equality Outcomes continued

Outcome 3	Inclusive environment
Aim	The Bank provides a flexible and supportive environment which is led and championed by inclusive leaders.
Objectives	Culture: The Bank's culture and values are embedded through an action plan that includes all colleagues.
	2. Inclusive leaders: leaders of the Bank are supported with leadership development to create an environment that values equality, diversity and inclusion.
	3. Educate ourselves: individuals are supported and encouraged to proactively seek out ways to increase their knowledge and awareness on subjects relating to equality, diversity and inclusion.
	4. Employee network groups: employee network groups are encouraged to share learnings and continually improve our policies and processes.
	5. Inclusive behaviours championed: diversity and inclusion role models are recognised for their positive influence.
	6. Influencing others: The Bank shared insights and experiences externally to support positive change.
Outcome 4	Positive impact on equality within suppliers and partners of the Bank
Aim	The Bank has influenced suppliers to improve equality and diversity where appropriate.
Objectives	Assessment of awards: Relevant award criteria and conditions considered in relation to regulated public procurements.
	2. Influencing: Suppliers are encouraged to develop appropriate Equality and Diversity policies and practices where not already in place.
	3. Monitoring: Equality and diversity data collected from supplier companies for all regulated public procurements.
	4. Reporting: Appropriate equality and diversity reporting agreed with long term suppliers for all regulated public procurements.