



EQUALITY AND ACCESSIBILITY POLICY

FCA Authorised Consumer Credit Lender

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Purpose

Lendology CIC is committed to an inclusive, accessible and respectful environment in which customers, team members, applicants, partners and stakeholders have fair access to our services, employment opportunities and workplace culture, regardless of background, circumstances or personal characteristics. This supports our social purpose, Consumer Duty obligations and commitment to fair treatment.

Scope

This policy applies to all team members, directors, contractors, Board members, applicants, customers, potential customers, local authority partners, suppliers and other stakeholders. Its principles apply throughout recruitment, employment, training, promotion, remuneration, service delivery and stakeholder engagement.

Policy statement

The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The protections that apply may vary according to the legal context; for example, marriage and civil partnership is protected in employment but not in the provision of services. Protection may also apply where a person is perceived to have a protected characteristic or is associated with someone who has one.

Lendology will:

- Promote equality, diversity and inclusion in recruitment, employment and service delivery.
- Provide accessible services, communications and customer support, including appropriate responses to vulnerability and accessibility needs.
- Maintain a safe, inclusive culture based on dignity, respect and professional behaviour.
- Value different backgrounds, experiences and perspectives, and ensure no person is treated unfairly, unlawfully or less favourably.
- Prevent discrimination, harassment, bullying and victimisation.
- Use stakeholder feedback and monitoring to improve accessibility, inclusion and customer outcomes.

Roles and responsibilities

Board

The Board is responsible for overseeing equality, accessibility and customer outcomes and ensuring adequate governance arrangements are in place. Consumer Duty and stakeholder considerations must form part of strategic decision-making.

Managers

- Apply recruitment and employment processes fairly and consistently, including consideration of reasonable adjustments.
- Promote accessibility, inclusion and a respectful working environment within their teams.
- Address concerns promptly and escalate discrimination, accessibility barriers or potential customer harm.

Team members

- Treat colleagues, customers and stakeholders with dignity and respect, and behave inclusively and professionally.
- Support accessibility and inclusion and report discrimination, harassment, exclusion or unfair treatment.
- Complete relevant training and follow associated procedures.

Requirements

1. Equality and inclusion

Lendology will not tolerate direct or indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment, sexual harassment, victimisation or bullying.

Recruitment, promotion, reward, training, development, terms and conditions, dismissal and service-delivery decisions must use objective, relevant criteria. People must not be treated less favourably because of a protected characteristic, because they are perceived to have one, because they are associated with someone who has one, or because they have raised or supported an equality-related concern.

Lendology will take reasonable steps to prevent sexual harassment in the course of employment, including harassment by colleagues, customers, contractors and other third parties. This will include assessing relevant risks, maintaining appropriate reporting arrangements, providing proportionate training and reviewing preventive measures. Concerns will be acted on promptly, fairly and sensitively, and retaliation against anyone who raises or supports a concern will not be tolerated.

2. Recruitment

Lendology will provide a fair, inclusive and accessible recruitment process. Decisions will be based on the role's requirements and the candidate's relevant skills, experience, qualifications, competence and suitability. No applicant will be treated less favourably because of a protected characteristic or other irrelevant personal factor. Questions about health or disability before an offer will be asked only where permitted by law, including to arrange adjustments, assess an intrinsic function of the role, monitor diversity or support lawful positive action.

Lendology will:

- Prepare a clear job description and person specification covering required skills, experience, qualifications and regulatory competencies.
- Advertise appropriately and use predefined criteria and structured processes to assess candidates objectively, consistently and without unlawful discrimination.
- Provide reasonable adjustments to remove barriers, such as alternative formats, flexible interviews or adapted communication.
- Complete proportionate, role-specific and consistent checks where relevant, including references, qualification verification, DBS and credit checks, and FCA fitness and propriety assessments.
- Handle candidate information confidentially and in line with data protection requirements.
- Train team members involved in recruitment on equality, inclusion, accessibility and unconscious bias.

We do not ask for current or previous salary. Pay and contractual benefits are based on the role, the candidate's skills, qualifications and experience, and the approved salary range. Lendology is committed to equal pay for equal work and will not discriminate in pay, benefits, occupational pension arrangements or other contractual terms. Pregnancy, maternity leave and other protected family-related circumstances will not result in less favourable treatment, including in relation to recruitment, pay, benefits, promotion, training or return to work.

Any positive action or specific job requirement must comply with the Equality Act 2010, be fair, justified and approved in advance. Recruitment decisions must always be based on evidence and must not involve unlawful discrimination.

3. Customer accessibility and Consumer Duty

Accessibility is essential to good customer outcomes. When designing products, communications and customer journeys, Lendology will anticipate the needs of disabled customers and take reasonable steps

to remove substantial disadvantage arising from its practices, physical features or the absence of an auxiliary aid. Adjustments will be provided without additional charge. Lendology will also consider the target audience, customers in vulnerable circumstances, consumer understanding, and sensory, physical, cognitive and communication needs. Communications should be clear, understandable and available in a format customers can reasonably access and use.

4. Vulnerable customers

Vulnerability may arise from health conditions, disability, life events, financial resilience or capability, and may be temporary or permanent.

- Identify and respond appropriately to indicators of vulnerability.
- Adapt communication and support where needed.
- Check whether vulnerable customers experience different outcomes.
- Use Vulnerable Customer Reviews and Consumer Duty monitoring to improve support and accessibility.

5. Workplace accessibility

Lendology will make reasonable adjustments for disabled applicants and team members where they would otherwise experience a substantial disadvantage. Requests will be considered promptly, fairly, supportively and in consultation with the individual. Adjustments may include changes to working arrangements, equipment, premises, document formats, recruitment, training or communication processes. Information about disability or adjustment needs will be handled sensitively and shared only where necessary.

- Flexible working arrangements.
- Adjusted equipment or working environments.
- Alternative document formats.
- Adapted recruitment, training or communication processes.

6. Stakeholder engagement

We will use feedback from customers, team members, local authority partners, community organisations and other stakeholders when reviewing products, policies, communications and services.

Lendology expects contractors, agents and suppliers acting on its behalf to comply with this policy. Appropriate equality and accessibility requirements will be included in selection, contracting, induction and oversight arrangements, and concerns about their conduct will be investigated and addressed.

Breaches, escalation and reporting

Any concerns about discrimination, harassment, unfair treatment, accessibility or customer harm should be reported to a manager, the Compliance Team or through the appropriate complaints, grievance or whistleblowing process. Concerns will be considered promptly and fairly, confidentiality will be protected as far as reasonably possible, and no person will be subjected to victimisation for making an allegation, giving evidence, supporting a complaint or doing any other protected act under the Equality Act 2010. Breaches may lead to remedial action, training, disciplinary action or Board escalation, as appropriate.

Monitoring and review

- Consumer Duty and Vulnerable Customer Reviews.
- Customer feedback, complaints and compliments.
- Recruitment and employment practices.
- Team member feedback and surveys.
- Stakeholder engagement.

We will regularly review how well this policy is working, using feedback from our team, customers and partners, alongside our existing reviews and reporting processes.

We will use what we learn to identify areas for improvement and ensure that everyone is treated fairly, respectfully and has equal access to our services.