

## **FirstGroup plc**

# **Equal Opportunities and Diversity Policy**

**THIS POLICY IS ALSO AVAILABLE IN LARGE TYPE.**

REFERENCE:	HR39
OWNER:	Group HR Director
VERSION NUMBER:	1.3
DATE:	August 2023

## Equal Opportunities and Diversity

### 1. Policy statement

- 1.1 FirstGroup plc, its Board, and its Group companies (“**us/our/we**”) are committed to equality of opportunity both in the provision of services to the public and as an employer.
- 1.2 This policy applies to FirstGroup plc and all our subsidiary or associated companies, and to all employees, workers or contractors (“**you/yours**”) engaged under a contract of employment or contract for services.
- 1.3 This policy seeks continuous improvement and compliance with legislation. It is based on the principles that:
  - 1.3.1 everyone has the right to be treated with dignity and respect;
  - 1.3.2 we will not discriminate on the grounds of race, gender, disability, nationality, religious or philosophical belief, age, sexual orientation, family status, trade union activity or any other factor;
  - 1.3.3 we will adopt fair and inclusive practices throughout our operations and will work to eliminate all prejudice, discrimination, bullying and harassment;
  - 1.3.4 you have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times; and
  - 1.3.5 non-compliance with this policy will be treated seriously and will not be tolerated.

### 2 Policy scope and application

- 2.1 The purpose of this policy is to ensure that everyone who comes into contact with our businesses are treated fairly and with respect at all times.
- 2.2 It is recognised that our subsidiary or associated companies will have locally agreed policies in place and this policy reflects the **minimum standard** that all locally agreed policies should adhere to.
- 2.3 The contents of this policy do not form part of any individual terms and conditions of employment or engagement. We reserve the right to make such changes as may from time to time be necessary.

### 3 Responsibilities and accountability

- 3.1 Our Board, Executive Committee, and the Managing Directors of our separate business units are tasked to ensure that they:
  - 3.1.1 create a productive and safe working environment, promoting diversity and inclusion in their workforce;
  - 3.1.2 actively demonstrate our diversity policy and practices;
  - 3.1.3 develop new practices to ensure inclusion for you and our customers; and

3.1.4 demonstrate continuous improvement in diversity and equal opportunities for all.

#### **4 Legislation and Codes of Practice**

4.1 This policy conforms to the current international legislation and relevant codes of practice in the countries within which we operate.

4.2 We will continually monitor this policy to ensure we are compliant with the requirements of relevant underpinning legislation; however, our aim is to exceed the requirements of legislation wherever possible.

4.3 This policy should be read in conjunction with our Group Code of Ethics and Group Dignity at Work policy.

#### **5 Partner Organisations**

5.1 We are committed to actively working with partner organisations to ensure its policies, procedures and practices are inclusive for all. In the United Kingdom the Group is a member of the Employers Forum on Disability, Opportunity Now and Race For Opportunity with representatives sitting on the Executive Board and National Quality Board of the National Centre for Diversity.

#### **6 Reporting**

6.1 We will present an annual report on our actions and achievements reflecting this policy to the Board, and report on our performance in our Corporate Social Responsibility report.

#### **7 Complaints**

7.1 If you feel that you have grounds for complaint in relation to bullying, discrimination, harassment or victimisation, you have the right to pursue the complaint through our internal grievance procedure.

7.2 Customers who feel they have grounds for complaint may pursue these through the customer complaints procedure. Our complaints procedure must be accessible to all.

#### **8 Practices and Standard Operating Procedures**

8.1 Detailed practices and standard operating procedures which support this policy will be particular to the operation they support and will at all times act in support of this policy.

#### **9 Access to Company Premises**

9.1 We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, contractors, customers and visitors as required by the Equality Act 2010 in the United Kingdom and the Employment Equality Acts 1998 – 2015 and Equal Status Acts 2000 – 2018 in the Republic of Ireland.

## **10 Access to Vehicles**

10.1 We will also take reasonable steps to ensure that our vehicles are accessible to customers and staff and comply with the relevant legislation for the country in which they operate.

## **11 Access to Information**

11.1 We will seek to ensure that information is made available to you and our customers in alternative formats as required.

## **12 Recruitment**

12.1 All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and any barriers to employment removed under the relevant legislation.

## **13 Staff Training**

13.1 Guidance and training will be provided to you as required with regard to diversity awareness and equality to ensure we are both an inclusive employer and service provider.

## **14 Audit**

14.1 We are committed to ensuring that our operations comply with the requirements of this policy. We aim to ensure compliance via regular audits and reviewing of action plans with the relevant managers and directors.

## **15 Human Rights**

15.1 We support the principles of the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff:

15.1.1 We will treat you fairly and honestly, regardless of where you work. You will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

15.1.2 We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

15.1.3 Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

15.1.4 Employment must be freely chosen. We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.

15.1.5 You have the rights of freedom of association and collective bargaining. We respect your right to choose whether or not to join a trade union without influence or interference from management. Furthermore we support your right to exercise that right through a secret ballot.

15.1.6 We will negotiate in good faith with your properly elected representatives.

15.1.7 We will abide by the non-discrimination laws in every country where we operate.

15.1.8 We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.

15.1.9 We have formal grievance procedures through which you can raise personal and work-related issues.

15.1.10 You will be given reasonable access to bathroom and rest facilities.

## **16 Data Protection**

16.1 We will comply with the relevant principles governing data protection in each country in which we operate.

## **17 Document history and change control**

17.1 This document will be reviewed by the Owner within twenty-four months of the issue date and at least once every twelve months thereafter. It will be reviewed at other times as dictated by operational needs and changes to the underlying legal position.

17.2 Requests for changes to this document must be sent to the Owner. All requests must provide details of the required changes and the reasons for the changes being requested. All changes will be noted in the table below by the Owner.