

DIVERSITY AND EQUAL OPPORTUNITIES POLICY 2022-2023.

1.0 STATEMENT OF POLICY

Pendragon PLC, “the Company” is an equal opportunity employer and has a Policy for this purpose. We are committed to ensuring that our workplaces are free from unlawful or unfair discrimination on the grounds of age, colour, race, nationality, ethnic or national origin, marital status, disability, sex or sexuality, gender reassignment, religious belief, part time or fixed term status within the framework of law.

The Company is committed to providing a working environment for all its Associates that is comfortable and free from all forms of bullying and harassment. The Company adopts a zero-tolerance approach towards bullying and harassment and any Associate who is found to have harassed or bullied a fellow Associate will be subject to disciplinary action, up to and including summary dismissal.

If the Company has grounds to believe that an Associate may have been bullying or harassing another Associate, whether or not there had been a formal complaint, the Company will instigate an investigation into the alleged bullying or harassment.

Any Associate who believes that another Associate’s conduct amounts to bullying or harassment has the right to follow the Company’s Grievance Procedure to raise their concern/s to their Leader (or senior Leader if the Leader is the individual portraying the bullying / harassing behaviour). Furthermore, Associates have the right to complain if they believe that they have been bullied or harassed by a third party, for example a customer, client or supplier. Compliance with this Policy should also ensure that Associates do not commit unlawful acts of discrimination.

Associates are encouraged to report any incidents of bullying or harassment that they experience or witness so that the Company can investigate and resolve the matter. The Company will take all such complaints seriously and an Associate who makes a genuine complaint of bullying or harassment will be protected and will not be penalised or victimised in any way.

1.1 As part of the investigation the Company will:

- 1.1.1** Make sure that the appropriate team Leader will arrange a meeting with the Associate raising the allegations;
- 1.1.2** Ensure that the Associate will be given full opportunity to explain their grievance;
- 1.1.3** Seek a means to resolving the Associate’s grievance taking into account Company policies, procedures, rules and the need for consistency and fairness;
- 1.1.4** Take appropriate action if it is felt justified.

- 1.2** The Company reserves the right to suspend or temporarily redeploy either the Associate suspected of bullying or harassment or the Associate raising a complaint of bullying or harassment during the investigations, if it is considered in the interests of the individual(s) or the Company to do so. Suspension in these circumstances does not constitute disciplinary action and will be on full basic pay.
- 1.3** As soon as possible following the conclusion of the investigation, the Company will inform the Associate suspected of bullying or harassment and the Associate raising the grievance as to the outcome. The Company will decide at that point whether or not it is appropriate to instigate disciplinary action against the alleged, bullying, Associate. Any disciplinary proceedings will be conducted in accordance with the Company disciplinary procedure.

2.0 YOUR RESPONSIBILITIES

- 2.1** Every Associate is required to assist the Company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.
- 2.2** Associates can be held personally liable as well as, or instead of, the Company for any act of unlawful discrimination. Associates who commit serious acts of harassment may be guilty of a criminal offence.
- 2.3** Acts of discrimination, harassment, bullying or victimisation against Associates or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

3.0 RECRUITMENT

We aim to ensure that our Associates achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminating criteria. This Policy covers all aspects of employment, from vacancy advertisements, selection for recruitment and training to conditions of service and reasons for termination of employment.

- 3.1** The objectives of the Pendragon Diversity and Equal Opportunities Policy are:-
 - 3.1.1** To ensure that the Company has access to the widest labour market and secures the best Associates for its business.
 - 3.1.2** To ensure that no applicant or Associate receives less favourable treatment and that wherever possible all Associates are given help to attain their full potential.
 - 3.1.3** To achieve an ability-based workforce, which is in line with the working population.
 - 3.1.4** To ensure Associates are recruited on the basis of ability to carry out the job and on merit.
 - 3.1.5** Ultimate responsibility for achieving the Policy's objectives lies with the Chief Executive.

- 3.1.6** Behaviour or actions against the spirit of this Policy will be classed as a serious disciplinary matter and may in some cases lead to dismissal.
- 3.1.7** To offer career development opportunities for all Associates.
- 3.1.8** Provide fair training opportunities relevant to the Associates role.
- 3.1.9** Provide a work environment free of harassment and bullying.

We will ensure instruction to leadership has been given in order to familiarise them with our Policy on equal opportunities and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity within the departments for which they are responsible.

All persons responsible for selecting new Associates, Associates for training, promotion or for transfer to another dealership or department, will be instructed not to discriminate against any Associate. Please also refer to our Respect at Work policy on the company intranet.

4.0 VACANCY ADVERTISING

- 4.1** Wherever possible, all vacancies will be advertised simultaneously internally and externally.
- 4.2** Wherever possible steps will be taken to ensure that knowledge of vacancies reaches under-represented groups internally and externally.
- 4.3** Wherever possible, vacancies will be notified to job centres, careers offices, schools, colleges, universities etc. with significant minority groups, as well as to minority press/media organisations.
- 4.4** All vacancy advertisements should include an appropriate short statement on equal opportunities.

5.0 SELECTION AND RECRUITMENT

- 5.1** Selection criteria (role description and person specification) will be kept under constant review to ensure that they are justifiable, non-discriminatory on grounds, and seen as being essential for effective performance of the job.
- 5.2** Wherever possible, more than any one person should be involved in the selection and recruitment process, and all should receive guidance on equal opportunities.
- 5.3** Reasons for selection and rejection of applicants for vacancies will be documented during the recruitment process.
- 5.4** The Company provides for specialist diversity training across all of its business units. The training is specifically tailored to cover topics including stereotyping, valuing difference and avoiding potentially discriminatory situations.

PERSONNEL RECORDS

In order to review the effective operation of the Equal Opportunities Policy (and for no other purpose) a record will be kept of all Associates age, gender, racial origins and disability. This information will be requested following initial recruitment but is not mandatory.

The information gathered will be reviewed on an on-going basis.