



DIVERSITY AND EQUAL OPPORTUNITIES POLICY

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 team members 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 team member who is found to have harassed or bullied a fellow team member will be subject to disciplinary action, up to and including summary dismissal.

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

Any team member who believes that another team member'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, team members 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 team members do not commit unlawful acts of discrimination.

Team members 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 a team member 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 team member raising the allegations;
 - 1.1.2 Ensure that the team member will be given full opportunity to explain their grievance;
 - 1.1.3 Seek a means to resolving the team member'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 team member suspected of bullying or harassment or the team member 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 team member suspected of bullying or harassment and the team member 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' team member. Any disciplinary proceedings will be conducted in accordance with the Company disciplinary procedure.



2.0 RECRUITMENT

We aim to ensure that our team members 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.

- 2.1 The objectives of the Pendragon Diversity and Equal Opportunities Policy are:-
 - 2.1.1 To ensure that the Company has access to the widest labour market and secures the best team members for its business.
 - 2.1.2 To ensure that no applicant or team member receives less favourable treatment and that wherever possible all team members are given help to attain their full potential.
 - 2.1.3 To achieve an ability-based workforce, which is in line with the working population.
 - 2.1.4 To ensure team members are recruited on the basis of ability to carry out the job and on merit.
 - 2.1.5 Ultimate responsibility for achieving the Policy's objectives lies with the Chief Executive.
 - 2.1.6 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.
 - 2.1.7 To offer career development opportunities for all team members.
 - 2.1.8 Provide fair training opportunities relevant to the team member's role.
 - 2.1.9 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 team members, team members for training, promotion or for transfer to another dealership or department, will be instructed not to discriminate against any team member.

Please also refer to our Bullying and Harassment Policy on The Way Manual.

3.0 VACANCY ADVERTISING

- 3.1 Wherever possible, all vacancies will be advertised simultaneously internally and externally.
- 3.2 Wherever possible steps will be taken to ensure that knowledge of vacancies reaches under-represented groups internally and externally.
- 3.3 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.
- 3.4 All vacancy advertisements should include an appropriate short statement on equal opportunities.



4.0 SELECTION AND RECRUITMENT

- 4.1 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.
- 4.2 Wherever possible, more than any one person should be involved in the selection and recruitment process, and all should receive guidance on equal opportunities.
- 4.3 Reasons for selection and rejection of applicants for vacancies will be documented during the recruitment process.
- 4.4 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 team members' 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.