

HR POLICY DOCUMENT

Equality, Diversity and Inclusion Policy – UK and Republic of Ireland | v4 | 10/09/2015

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1.0 Introduction and Scope

At Sodexo we are committed to the importance of promoting equal opportunities, valuing diversity and creating an inclusive working environment for all our employees. We operate in increasingly diverse environments, both in Sodexo UK and Ireland and internationally, and this is evident in our workforce, clients, customers, suppliers, communities and partners.

In our increasingly competitive business environment we understand that the performance and engagement of our employees is central to business success. We are committed to creating an environment in which each employee is able to fulfil their potential and maximise their contribution.

Equality, diversity and inclusion (ED&I) are championed at the highest level in the organisation by the Chief Executive and Regional Leadership Committee. We have a Diversity & Inclusion Council which is chaired by a member of the Regional Leadership Committee and its membership includes senior leaders and operators from across the organisation. The Council provides direction for ED&I programmes, promotes an inclusive workplace culture and facilitates the sharing of best practice across the organisation.

This document describes the UK and Republic of Ireland policy for equality, diversity and inclusion (ED&I). It applies to all employees, job candidates, casual, temporary and agency workers. This policy does not form part of any employee's contract of employment. The Company reserves the right to change this policy at any time and in any event will review it on a periodic basis.

2.0 Aims

In line with Equality Act 2010 (UK) and the Employment Equality Act 1998 - 2011 (ROI) we will:

- Ensure equality, diversity and inclusion in the workplace are supported and celebrated;
- Offer fair treatment in every aspect of working life in Sodexo, this applies to all employment policies and practices including those relating to:
 - Recruitment, selection and retention;
 - Terms and conditions of employment;
 - Working environment;
 - Learning and development;
 - Promotion and career progression;
 - Redundancy and re-deployment.
- Promote a culture where employees recognise the value that a diverse and inclusive workforce brings; and
- Be recognised as an employer with a positive reputation for diversity and inclusion practices.

These aims apply to all of the protected characteristics as defined in the Equality Act 2010 and the Employment Equality Act 1998 - 2011 (ROI):

Protected Characteristic (UK)	UK Definition	Protected Characteristic (ROI)	ROI Definition
Age	Refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	Age	Refers to all ages above the maximum age at which a person is obliged to attend school.
Disability	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.	Disability	A person with physical, intellectual, learning, cognitive or emotional disabilities and a range of medical conditions.
Gender Reassignment	The process of transitioning from one gender to another.	Gender	A man, a woman or a transsexual person (specific protection is provided for pregnant employees or in relation to maternity leave).
Marriage and civil partnership	Formal union of a man and a woman or marriage between same sex couples. Same sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.	Civil Status	Single, married, separated, divorced, widowed or in a civil partnership (within the meaning of the Civil Partnership Act).

Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context.	See Gender (above)	Pregnancy and Maternity is covered within Gender under the Employment Equality Act 1998 - 2011 (ROI) (Please see the gender section above).
Race (includes colour, nationality and ethnic origins)	Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.	Race	A particular race, skin colour, nationality or ethnic origin.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	Religion	Different religious belief, background, outlook or none.
Sex	A man or a woman.	See Gender (above)	Sex is covered within Gender under the Employment Equality Act 1998 - 2011 (ROI) (Please see the gender section above).
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	Sexual Orientation	Gay, lesbian, bisexual or heterosexual.
		Family Status	A parent of a person under 18 years or the resident primary carer or a parent (including adoptive parents) of a person with a disability.
		Membership of the Traveller Community	People who are commonly called Travellers, who are identified both by Travellers and others as people with a shared history, culture and traditions, identified historically as a nomadic way of life on the island of Ireland.

In line with the legislation those perceived as having one of the protected characteristics are also protected.

3.0 Policy Application

To achieve our aims, Sodexo commits to the following:

- Ensuring that the principles of this policy are embedded in HR strategy and all policies and procedures are regularly monitored and reviewed;
- Providing awareness training and guidance to all employees and managers to ensure our commitment to ED&I is known and understood;
- Monitoring and measuring diversity throughout the employment lifecycle using qualitative and

- quantitative information to assist in identifying and removing any form of discrimination;
- Challenging and investigating discriminatory behaviour and enforcing the disciplinary procedure, when this is considered necessary;
- Appointing Diversity Champions to promote ED&I across Sodexo;
- Communicating, through internal communication channels, and regularly reviewing ED&I initiatives that have successfully been implemented;
- Supporting the communities in which we live and work to ensure that we are involved, accessible and socially responsible;
- Working with external groups and advisory bodies to keep up to date with external best practice.

Some examples of how we will achieve this are:

- Ensuring that practices and assumptions made about ability based on age are eliminated and not using age as a criterion to restrict access to services (unless it can be objectively justified);
- Discouraging assumptions made about ability based on an individual's disability, impairment or health condition;
- Reviewing our recruitment processes for disabled applicants and taking appropriate measures, so far as is practicable to ensure that applicants with a disability have the same opportunities as those without disabilities;
- Supporting employees who experience disability whilst in their post to include the provision of reasonable adjustments and access to the occupational health service. This will include access to appropriate equipment, information, decision making and means of communication through, for example, the use of, tape, Braille, interpretation for hearing impaired people etc.;
- Supporting all employees, as appropriate to the needs and demands of the business, in making personal choices about their parenting, caring and work roles and responsibilities and help them find a work life balance that supports all priorities;
- Actively supporting those employees taking family friendly leave. For instance, we will ensure all employees are welcomed back appropriately and kept in contact with whilst on maternity, adoption, paternity or shared parental leave.
- Valuing the skills developed in the home and community as well as those developed in the workplace and will, as appropriate to the needs of the business support employees to play an active part in the community they live in;
- Ensuring everyone feels comfortable in the workplace to discuss their own personal marital/relationship status and their own family situation;
- Confronting homophobic attitudes, behaviours and language and promote an understanding of individual rights and attributes;
- Ensuring we take a proactive role in promoting the understanding of gender, transgender as well as marital/civil partnership status;
- Ensuring religious festivals, holidays and rights of worship are recognised and accommodated wherever and whenever reasonably practicable taking into consideration business needs and requirements;
- Ensuring dietary needs are catered for where reasonably practicable, for example at training events and special events;

4.0 Measuring Policy Effectiveness

Some ways in which we will measure the effectiveness of our ED&I policy include:

- Collating and reviewing quantitative and qualitative data throughout the employee lifecycle to identify any areas requiring action;
- Publishing annual diversity data regarding the demographics of our workforce, for example in the Annual Report and Corporate Citizenship report;
- Recognition by external bodies in the form of awards, nominations and accreditations; and
- Benchmarking against other organisations and external audits.

5.0 Further Information

If you have any queries regarding this policy please contact you manager in the first instance.

More information can be found on the Diversity & Inclusion pages on Sodexo_Net and Your Sodexo or you can email the Diversity and Inclusion team at diversityandinclusion.uk@sodexo.com.

If you require this policy in another format please contact the Diversity & Inclusion team.

6.0 Monitoring

We continuously review this policy, together with all of our employment policies and practices to maintain our focus on equality of opportunity.

To ensure that this policy and other procedures are operating effectively, HR will continue to monitor and measure the records of our employees, benchmark our performance as a Company and ensure that any patterns or trends are identified and resolved.

7.0 Standard Templates & Associated Documents

Document	1	2	3	4
Procedure Document(s)	N/A	v	15/05/2013	NA

8.0 Document Control

Version	Date	CHRA Owner	Status	Updated from previous Version
1.0	01/07/2008	D&I	Approved	Original Version
2.0	27/04/2009	D&I	Approved	Updated
3.0	01/10/2012	D&I	Approved	Updated following Equality Act legislation
4.0	10/09/2015	D&I	Approved	General update and clarification of protected characteristics for UK and ROI

9.0 Appendix One – Definitions

Term	Definition
Discrimination arising from disability	Occurs when someone is treated unfavourably because of something connected with their disability and such treatment cannot be justified.
Discrimination based on association	Occurs when you treat another person less favourably because of their association with another person who has a protected characteristic (other than pregnancy and maternity).
Discrimination based on perception	Occurs when you treat another person less favourably because you mistakenly think that they have a protected characteristic.
Discrimination because of pregnancy and maternity	It is discrimination to treat a woman (including a female pupil of any age) less favourably because she is or has been pregnant, has given birth in the last 26 weeks or is breastfeeding a baby who is 26 weeks or younger. It is direct sex discrimination to treat a woman (including a female pupil of any age) less favourably because she is breastfeeding a child who is more than 26 weeks old.
Direct discrimination	Occurs when someone is treated less favourably than another person because of a protected characteristic
Diversity	The many identities that define each people as unique individuals.
Equality	Removing barriers, eliminating discrimination and ensuring equal opportunity and access for all groups of people within Sodexo.
Harassment	Unwanted conduct related to a relevant protected characteristic (whether from a third party, colleague, client or customer) which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.
Inclusion	Creating a working culture where differences are embraced and respected; where everyone has the opportunity to develop themselves consistent with our vision and values. Our aim is be an organisation where all individuals feel respected, valued, and able to be themselves, contribute to the team and meet their full potential.
Indirect discrimination	Occurs when a policy, rule or procedure applies to everyone but has a disproportionate impact on people with a protected characteristic
Victimisation	Occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so.

(Source: Adapted form Equality & Human Rights Commission).