



# **Diversity & Equal Opportunities Policy**

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#### References:

The term 'company', 'the company 'or 'company's in this document refers to "Firstsource Solutions Limited"

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#### Introduction

Firstsource is committed to fostering a workplace culture that promotes equality, diversity, and inclusion (EDI), in full alignment with the **Equality Act 2010** in Great Britain and the relevant equality legislation in **Northern Ireland**, including the **Fair Employment and Treatment** (**Northern Ireland**) **Order 1998**, the **Sex Discrimination** (**Northern Ireland**) **Order 1976**, and other applicable regulations.

We aim to ensure our workforce reflects the diversity of the communities we serve and that every employee feels respected, valued, and empowered to contribute their best. As a global organisation, we recognise the importance of understanding and respecting cultural differences. Diversity is one of our core strengths.

#### **Purpose**

This policy outlines Firstsource's commitment to:

- Promoting equality and eliminating discrimination, harassment, and victimisation.
- Providing equal opportunities in recruitment, training, development, and progression.
- Valuing diverse perspectives and experiences to enhance innovation and performance.
- Ensuring fairness in all employment practices, including those involving automated decision-making tools and AI systems.

#### **Legal and Ethical Commitment**

Firstsource will not tolerate any form of unlawful discrimination based on the following protected characteristics:

- Age
- Disability
- · Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation
- Political opinion (specific to Northern Ireland)

We also recognise the potential risks associated with AI and algorithmic decision-making in recruitment, performance management, and other HR processes. To mitigate these risks, we commit to:





- Conducting AI bias impact assessments prior to deployment.
- Ensuring transparency and explainability in Al-driven decisions.
- Providing human oversight and contestability for decisions made or influenced by AI.
- Complying with UK GDPR, the Data Protection Act 2018, and relevant Northern Ireland guidance.

#### Implementation and Responsibilities

To embed this policy across the organisation, Firstsource will:

- Communicate the policy through induction, training, and internal platforms.
- Ensure managers and supervisors receive regular EDI and bias-awareness training.
- Train recruitment and promotion assessors in non-discriminatory and inclusive practices.
- Establish governance frameworks for ethical AI use in HR processes.

In Northern Ireland, we will comply with the Fair Employment Monitoring Regulations, including:

- Monitoring the community background (Protestant, Roman Catholic, or neither) and sex of employees and applicants.
- Submitting annual monitoring returns to the Equality Commission for Northern Ireland.
- Retaining monitoring data for a minimum of three years.

### **Complaints and Resolution**

Employees who believe they have experienced discrimination, harassment, or victimisation are encouraged to:

- Seek informal resolution through discussion with their line manager or a trusted colleague.
- Raise formal concerns via the Grievance Procedure, ensuring confidentiality and fair investigation.
- Contact the HR Team directly for sensitive matters.

Firstsource guarantees protection against victimisation for individuals raising concerns in good faith. However, malicious or bad-faith allegations will be addressed under the Disciplinary Policy.





## **Monitoring and Review**

To ensure the effectiveness of this policy, Firstsource will:

- Monitor workforce composition across ethnicity, gender, age, religion, disability, and community background (in NI).
- Review recruitment and promotion outcomes for fairness and inclusivity.
- Conduct regular audits of AI systems used in HR to detect and correct bias.
- Review the policy at least annually, and in response to changes in legislation, technology, or organisational needs.

All personal data collected for monitoring purposes will be handled in accordance with the Data Protection Act and used solely for EDI improvement.

#### **Disclaimer**

This policy is not contractual and may be amended to reflect evolving business needs and legal requirements. This policy should be read in conjunction with the Global Statement on Diversity and Equal Opportunities.