

### **Overview of the FOA Policy Compliance Monitoring Program**

FirstGroup America Inc. (FirstGroup) is committed to its Freedom of Association (FOA) Policy which recognizes employee freedom of association as a fundamental human right and provides, among other things, that management shall not influence or interfere with employees' choice whether or not to be represented by a labor union. A copy of the FOA Policy should be posted at your facility. If not, please contact the FirstGroup Hotline via telephone at 1-877-3CALLFG or via e-mail at [hotline@firstgroup.com](mailto:hotline@firstgroup.com).

FirstGroup has developed a Compliance Monitoring Program to insure that everyone at FirstGroup complies with the FOA Policy. This program includes two parts: (1) compliance oversight, where observers oversee compliance with the FOA Policy during a union election, and (2) compliance monitoring, where an independent monitor will investigate alleged violations of the FOA Policy that are filed with the monitor's office.

This program goes well beyond employee protections provided under applicable labor relations laws. However, in so far as non-employee union organizers or non-employee union organizing access to company property is concerned, the program only provides those requirements which are established under applicable law.

#### **(1) Observers – Compliance Oversight**

Independent observers will be on-site during secret ballot elections to observe if FirstGroup's FOA Policy is being followed. These observers are not employees of FirstGroup and will provide independent oversight of any union election process. Observers may interview employees confidentially and prepare a report for FirstGroup, PLC in the United Kingdom.

#### **(2) Independent Monitor – Compliance Monitoring**

FirstGroup has named William B. Gould IV to serve as the Independent Monitor to investigate alleged violations of the FOA Policy that are filed with his office.



Mr. Gould has been an influential voice on worker-management relations for over forty years. He is a professor at Stanford Law School, specializing in labor law. He was appointed by President Bill Clinton as Chairman of the United States National Labor Relations Board and served in that position from 1994 to 1998. Mr. Gould has been a strong advocate for employee rights, has been in the forefront of development of employee Freedom of Association principles in the United States, and has acted in numerous cases as an impartial arbitrator between labor and management.

Mr. Gould is the recipient of five honorary doctorates for his significant contributions in the fields of labor law and labor relations. Before joining the Stanford Law School Faculty in 1972, he was a professor of law at Wayne State Law School and was an attorney for the National Labor Relations Board, as well as for the United Auto Workers.

#### **Independent Monitor Complaint Process**

Those wishing to file a Complaint with the Independent Monitor may do so by submitting a fully completed and signed Complaint to the Office of the Independent Monitor.

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Complaints must be filed with the Independent Monitor's office within 60 days of the alleged violation. Complaint forms are available by contacting your manager or by contacting the Office of the Independent Monitor at the information provided below.

A complaint may be filed by any employee of FirstGroup; a third-party representative of an employee; or any representative of a labor union that represents or is seeking to represent employees of FirstGroup. Submitting a Complaint Form to the Office of the Independent Monitor does not affect the right to file an unfair labor practice charge or to complain to any public agency.

The Independent Monitor will investigate the allegations and report his findings to FirstGroup and the complaining party. The Independent Monitor will strive to complete his report within 30 days of the filing of the complaint, and FirstGroup will strive to implement or address the Independent Monitor's recommendations within 30 days of receiving the Independent Monitor's report. FirstGroup's response will go to both the Independent Monitor and the complaining party. The Independent Monitor periodically will report to FirstGroup, PLC regarding his activities and findings with regard to the program itself.

**Contact Information for the Office of the Independent Monitor:**

Office of the Independent Monitor for FirstGroup America  
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