



Marston's Code of Conduct

The Marston's Way

Please note that certain policies referred to in The Marston's Way are only available internally, on the Marston's network. These will not be accessible outside of Marston's.



CEO INTRODUCTION

I'm proud to say that Marston's is a successful business - it's a substantial business with national reach. But what I'm most proud of is that over the years, while our business has developed and grown, we've not lost sight of what's truly important.

Marston's is a people-powered business and there's one element at its core that never fades, regardless of how big our business has become, and that is...we care. Our 'reason for being' as a business is to help people feel good, whether they are...

- eating our food
- enjoying our drinks
- experiencing our hospitality
- staying in our accommodation
- working with us or for us
- investing with us

If we're to achieve this, it's important that we run our business in an ethical and responsible manner, truly caring for the people and places we impact along the way.

While we trust that our employees will always strive to do the right thing, as a business we take responsibility for directing and guiding our people when they need it. This guide - The Marston's Way - is designed to provide our people with the help and support they may need, in an easily-accessible format, combining lots of information all in one place. If you're unsure in any way, or just need a helping hand when making a decision, please use this guide and the policies within, as a reference point. That way, we can be sure we'll continue to make a positive impact and do things the right way...The Marston's Way!

OUR PURPOSE AND STRATEGIC OBJECTIVES

We want there to be no better place for our people to work, guests to enjoy themselves and shareholders to invest.

Our purpose is to help people feel good. We know that if our people enjoy working for Marston's and can make a positive difference, they will feel good. This 'feel good factor' will then be passed onto our guests and other stakeholders (eg, investors, suppliers, communities) through our quality products, inspiring environments and super service. Our ambition and purpose is supported by our strategic objective...

- Operating high quality pubs and lodges offering great places to drink, eat and stay.

This objective is focused on maintaining and growing a successful and sustainable business, in which our employees, guests and investors can all share.

OUR WAYS OF WORKING

Our Ways of Working are the behaviours and values we expect from, and see demonstrated by, our people everyday. If the ambition, purpose and strategic objectives are 'what' we are striving to achieve, the Ways of Working demonstrate 'how' we aim to achieve them.

Our Ways of Working are designed to guide our people in their day-to-day activities, helping to provide a framework for them to work within, while continuing to bring their own personality and individual style to life. We're a people-powered business, so it's essential our people work together, care about each other, recognise a job well done and always strive to be the best.



WE ARE ONE TEAM

Trusted to make the right decisions and play our part.



WE CARE

We take time to listen, understand and do the right things for our customers and stakeholders.



WE CELEBRATE

When we do something really well, we shout about it and have fun celebrating.



WE DREAM BIG

Together we strive to make Marston's so much more, always aiming to exceed expectations.

THE MARSTON'S WAY

As a business that prides itself on engaging and enabling team members to take responsibility, it's important that we all know what's expected of us and that we have the support and guidance to make the right decisions.

There will be times when, no matter what your role, you'll be faced with making a difficult decision at work – a decision that could impact Marston's reputation. This is where The Marston's Way comes into play...

The Marston's Way is all about caring enough to do the right things on behalf of Marston's – legally and morally. To do this, we need to make sure everyone has access to the information to help guide their decision-making. You can use our ambition, purpose and our four Ways of Working as a moral guide, but legally, it's important that we all act in accordance with Marston's policies (documents that detail what is and isn't appropriate on specific subjects). We'll never be able to predict every situation that you might find yourself in, but The Marston's Way is a good starting point if you're looking for information, support and guidance about our people, our business, our company property and how we impact others.

WE CARE... ABOUT OUR PEOPLE

Marston's is a people-powered business, so it's vital that we care for, support and develop our people in the right way.

We've got a broad range of people, doing lots of different jobs in lots of different places. All of our people contribute to the success of our business, so in turn, we must respect the diverse nature of our workforce. It's important that everyone is treated fairly and has an equal opportunity to develop and grow and we can only do this in an environment free from harassment, bullying and discrimination. We need to retain the very best people, attract the very best people and trust our people to do a great job. Everyone who works for us should feel safe at work. Ensuring a safe and healthy working environment is paramount to the way we do business.

WHAT DOES THIS MEAN FOR ME?

We should always...

- Treat each other with respect – be fair, honest and courteous.
- Value diversity and promote equal opportunities for all of our employees.
- Speak up if we see bullying, harassment or discrimination in the workplace.
- Comply with all aspects of the Modern Slavery Act and ensure that slavery and human trafficking is not taking place in any part of our business or supply chain.
- Make the safety of ourselves and our teammates, guests, suppliers, partners and communities a top priority.
- Speak up if we see, or are asked to do, anything that we think is unsafe or immoral

The following policies provide detailed guidance on how we care for our people:

- [Diversity & Inclusion](#)
- [Human Rights](#)
- [Safety](#)
- [Equal Opportunities](#)
- [Whistleblowing](#)

WE CARE... ABOUT OUR BUSINESS

Being a trusted partner means always doing the right thing for our guests, communities, investors, regulators and employees. As such, Marston's operates zero tolerance towards all forms of corruption. This means we never tolerate fraud, bribery or corruption and we avoid potential conflicts of interest by being upfront and honest. We expect the same behaviour and standards from our suppliers and partners. At times, we may all find ourselves in situations where we are working or mixing with competitors, suppliers and customers and it's important to know what information is appropriate to share. It's really important that we comply with competition and antitrust laws but, it's more than that, it's also about being honest and straightforward in the way we do business. We operate in an ethical way, trading and negotiating in a transparent, confidential and fair manner, without abusing our buying power or gaining any personal advantage as purchasing decision-makers. We also aim to be as environmentally responsible as possible, protecting the environment, our employees, our brands and the communities in which we work; after all, caring is one of our core values.

WHAT DOES THIS MEAN FOR ME?

We should...

- Speak up if we suspect fraudulent activity. Speak to your line manager or use the confidential Speak-up help line.
- Never accept or offer any gifts or hospitality that could be considered to be a bribe.
- Record any gifts and hospitality you receive using the Gifts and Hospitality Register, having first considered whether it is appropriate to accept.
- Work with our procurement team when sourcing new suppliers, especially on high value contracts, to ensure they meet our standards.
- Disclose and record any personal, social or financial interests that might present a conflict of interest to our work at Marston's.
- Never take part in anti-competitive behaviour with our competitors – such as fixing prices or swapping commercially sensitive information.
- Avoid making exclusive arrangements, including contracts that mean our suppliers can only work with us.
- Spend the company's money in a controlled and professional manner, ensuring value for Marston's and for our customers.
- Ensure confidential information remains confidential. If you're in a role where you are handling commercially sensitive information, ensure you know who you can and who you can't share this information with.
- Ask for guidance from your line manager or the legal team (based at Marston's House) if you are unsure about who you can share information with and ensure your competition compliance training is up to date.

The following policies provide detailed guidance on how we care about our business:

- [Competition Law](#)
- [Anti-bribery & Corruption](#)
- [Gifts & Hospitality](#)
- [Social Media](#)
- [Environmental](#)
- [Purchasing](#)

WE CARE... ABOUT COMPANY PROPERTY

Company property is more than just the physical assets we own, such as our buildings and equipment. It also represents the intellectual property, information and insight we store on our systems that we need to protect.

In this day and age, we all know how important it is to keep our personal information safe and secure. The same is true of our employees, guests, suppliers and partners - we must ensure we protect the confidentiality and integrity of personal data and that we use this information in appropriate ways.

We should do all we can to safeguard all of our assets, whether they are physical assets that we should protect from loss, damage or theft, or intellectual property that we should keep confidential and secure.

Marston's requires all employees at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.

WHAT DOES THIS MEAN FOR ME?

We should...

- Use our assets, such as buildings, vehicles, laptops and phones, for business reasons only – unless we've got permission for other use.
- Look after our assets with care and protect them from theft, misuse and damage.
- Keep all of our documents and devices, such as laptops and mobile phones, protected and secure.
- Ensure that any information shared, used or stored follows the Data Protection and IT Policies, and if in doubt, check with your line manager.
- Make sure you regularly change passwords and keep your passwords to yourself.
- Only keep documents and records for as long as legally, commercially or practically necessary and ensure that all records (whether hard copy or electronic) are stored securely and disposed of in an appropriate way.
- Report details immediately to your line manager if you suspect that a fraud has been committed or see any suspicious acts or events.

The following policies provide detailed guidance on how we care about company property:

- [Data Protection](#)
- [IT](#)
- [Social Media](#)
- [Fraud](#)
- [Document Retention](#)

WE CARE... ABOUT OTHERS

We understand that in the process of operating our business, we have a responsibility that reaches far beyond caring for our employees, our property and our business. We have a duty of care to operate our business in an ethical way, having a positive impact on our guests, consumers, suppliers, partners, communities and stakeholders.

We play an important role in the community at large – often the local pub is the hub of the community, a place to meet friends, socialise and celebrate key events. Our breweries also sit at the centre of local communities, often recognised for their heritage and regional following. We're proud to work with local people, supporting, volunteering and raising much-needed funds for causes close to our and their hearts.

We take our corporate responsibility very seriously. With hundreds of sites across the UK and thousands of employees based in them, we support and encourage our people to get involved, strengthening our links with local communities.

We care about the environment too - we're working hard to reduce the amount of energy we use and the impact we have on the environment across our estate, from the use of plastic and the amount of waste we send to landfill, through to ensuring we are responsible in our use of water, electricity and gas.

We care about our guests' wellbeing and take the nutrition, quality and safety of the food we serve very seriously. Marston's seeks to avoid the inclusion of any allergen ingredients or additives when they do not add anything of benefit to the final product. The Food Supplier Charter and the Food Policy manual set out our approach and expectations of third-party suppliers and our employees.

WHAT DOES THIS MEAN FOR ME?

We should...

- Look to reduce our environmental impact by minimising energy consumption, use of fossil fuels and waste to landfill.
- Aim to be the hub of the community and a great neighbour by working with local communities and stakeholders to support local causes and organisations.
- Make sure that our partners – customers, suppliers and communities – work to the same high standards as we do.
- Provide safe and healthy environments and products for our customers to enjoy.
- Ensure we develop, produce, market and sell our products and services in a responsible way.

The following policies provide detailed guidance on how we care about others:

- [Environmental](#)
- [Purchasing](#)
- [Data Protection](#)
- [Safety](#)
- [Food](#)

WE CARE ENOUGH TO... SUPPORT YOU

We know when you're faced with making a difficult decision, you might need some help in figuring out what to do. Use our handy 'pause, think, act' tool below to guide you.

PAUSE:

If faced with a difficult decision about something at work, just pause for a moment and consider these questions...

THINK:

Ask yourself

- Is it illegal?
- Does it go against the Marston's Way or our companies policies?
- Does it go against our Ways of Working?
- Will it appear unethical to people outside our company?
- Could it harm the reputation of Marston's?

ACT:

If you answered 'yes' to any of these questions or you're not sure, you should ask for help and advice on what to do next.

WE CARE ENOUGH TO... SPEAK UP

If you see or hear something that just doesn't feel right, it's really important to speak up. We understand that you might be worried about raising concerns, but you can be assured that you'll be supported if you have a genuine issue.

Firstly, you should raise the issue with the individual / individuals involved. If you don't feel your concerns are taken seriously, or you don't feel able to speak to the individuals directly, you can also speak to:

- Your linemanager
- A senior leader / director
- Your HR BusinessPartner
- Speak Up – our confidential reporting line 0800 007 3111, or you can email speakup@marstons.co.uk

It's important that we all care enough to do things the right way - The Marston's Way.

SUPPORTING POLICES & DOCUMENTS

Please find below quick links to the policies and documents included in The Marston's Way...

- [Anti-bribery & Corruption](#)
- [Competition Law](#)
- [Data Protection](#)
- [Diversity & Inclusion](#)
- [Document Retention](#)
- [Environmental](#)
- [Equal Opportunities](#)
- [Food](#)
- [Fraud](#)
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- [Social Media](#)
- [Whistleblowing](#)