

## MARSTON'S POLICY:

# Equality, Diversity & Inclusion (ED&I) and Discrimination Policy 2025

This policy applies to all our employees, volunteers, casual workers, agency workers and should be supported by our self-employed partners/operators across Marston's, irrespective of position and contract., benefits, reward and promotion.

## Purpose

At Marston's, we are committed to fostering a welcoming, safe, and inclusive environment for all employees, partners and guests, supporting everyone to 'Come as They Are'. This Equality, Diversity & Inclusion (ED&I) Policy sets out our expectations and commitments to ensure dignity, respect, and equal opportunities across all areas of our company, both in line with our Marston's Values and Behaviours and with the UK Equality Act 2010.

The Equality Act 2010 consolidates and strengthens various anti-discrimination laws. It aims to protect individuals from unfair treatment and promote a more equal society. The Act covers nine protected characteristics, which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

- The Equality Act 2010 makes it unlawful to discriminate against individuals based on these characteristics. It also addresses issues such as harassment and victimisation, ensuring that everyone is treated with dignity and respect.

## Scope

This policy applies to all our employees, volunteers, casual workers, agency workers and should be supported by our self-employed partners/operators across Marston's, irrespective of position and contract. We ensure inclusivity and a sense of belonging across all areas of our business and employee/partner career journey, including recruitment, onboarding, fair and accessible learning opportunities, benefits, reward and promotion.

- Our ED&I strategy is designed to ensure our people:
- Relate to, feel represented by, and trust each other
- Feel valued and supported
- Feel involved in the bigger picture
- Are recognised and appreciated as individuals
- Communicate openly, have a voice, and are listened to

As a member of the Marston's team, you are expected to:

- Be respectful and professionally toward all colleagues, guests, and suppliers.
- Champion fairness, equality, and access in your daily work.
- Speak up and act when you witness exclusion, discrimination, or harassment.
- Learn continuously about inclusive behaviours and how to challenge bias in yourself and others.



# Our Definitions

**Equality:** meaning fair treatment, access, and opportunities for all — while actively working to remove barriers that disadvantage some people. Unlike equality, which treats everyone the same, equality recognises that different people may need different support to thrive.

Example: Adjusting shift patterns for someone with caring responsibilities so they have the same opportunity to succeed as others.

**Diversity:** the presence of differences — including visible and invisible characteristics such as age, gender, race, disability, sexual orientation, religion, social background, and more. A diverse workplace harnesses the power of a wide range of perspectives, skills, and experiences.

Example: Supporting learning opportunities for people with ADHA or Dyslexia, with system innovation to ensure everyone has a fair chance to learn in a comfortable environment

**Inclusion:** a clear focus on creating a culture where all individuals feel respected, valued, and able to contribute fully — regardless of their background or identity. It means making sure everyone feels they belong and have a voice.

Example: Creating diverse project teams that encourage collaboration among individuals with different experiences and perspectives, ensuring everyone feels empowered to share their ideas freely and participate in meaningful decision-making.

**Belonging:** a strong sense of belonging is present, people feel safe to express their ideas, take part fully, and know that their contributions matter. Belonging is the emotional outcome of a truly inclusive culture.

Example: A team member feels empowered to share their cultural traditions during a team event, and their colleagues actively participate and show genuine interest, fostering a sense of acceptance and inclusion.



# Understanding Discrimination

At Marston's, we are committed to ensuring that no team member, guest, or stakeholder experiences discrimination in any form. Discrimination is treating someone unfairly or less favourably because of a personal characteristic protected by law or company policy. It can be intentional or unintentional — and it is not tolerated under any circumstances.

Discrimination can affect anyone, regardless of their position, and can originate from team members, leadership, or guests.

## Types of Discrimination

### Direct Discrimination

This happens when someone is treated less favourably specifically because of a protected characteristic — for example, someone being overlooked for a promotion because of their race, gender, or disability.

### Indirect Discrimination

Occurs when a policy, rule, or way of working applies to everyone but puts people with a certain characteristic at a disadvantage. For example, a dress code that does not accommodate religious attire.

### Bullying and Harassment

Unwanted Bullying and Harassment behaviours that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment can be verbal, physical, written, or visual - for example, offensive jokes, gestures, or images. Behaviour can constitute bullying or harassment where it violates the dignity of a member of staff on the grounds of their protected characteristics

Bullying and harassment can also be recognised through behavior which creates an intimidating, hostile, degrading, humiliating, or offensive environment. Individual or accumulative acts can seriously undermine dignity, confidence and work satisfaction to such an extent that it has an effect on job performance and general happiness both inside and outside of work.

Conduct becomes harassment if it persists, and it has been made clear that it is regarded as offensive by the recipient or a witness to the conduct, although a single offensive act can amount to harassment if it is sufficiently serious.



# Understanding Discrimination

## Sexual Harassment

Sexual harassment takes many forms, but whatever form it takes it is unlawful under the Equality Act 2010 as amended.

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (eg WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- sexual comments or jokes, which may be referred to as "banter"
- displaying sexually graphic pictures, posters or photos
- suggestive looks, staring or leering
- propositions and sexual advances
- making promises in return for sexual favours
- sexual gestures
- intrusive questions about a person's private or sex life or a person discussing their own sex life
- sexual posts or contact in online communications, including on social media
- spreading sexual rumours about a person
- sending sexually explicit emails, text messages or messages via other social media
- unwelcome touching, hugging, massaging or kissing



# Understanding Discrimination

## Third Party Sexual Harassment

Third-party sexual harassment occurs when a member of our workforce is subjected to sexual harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public, self-employed contractors, friends and family of colleagues.

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

## Victimisation

Treating someone unfairly because they've made a complaint about discrimination, supported someone else's complaint, or raised a concern. This also applies to those involved in an investigation. Examples of victimisation may include:

failing to consider someone for promotion because they have previously made a sexual harassment complaint  
dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint  
excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

## Associative Discrimination

Discrimination against a person because they have an association with someone who has a protected characteristic — for example, being treated unfairly because of caring for a disabled child.

## Perceptive Discrimination

Treating someone unfairly because you think they have a protected characteristic, even if they do not — for example, assuming someone is gay and excluding them based on that assumption.



# Speak Up (Whistleblowing)

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes but is not limited to: suspected bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes concealment of any of the above.

## How to raise a concern

We hope that in most cases you will be able to raise any concerns with your manager. If you prefer not to raise your concern with your manager, you can contact the People Team or the Company Secretary.

Where this is not possible, or where you would prefer to raise your concern anonymously, Marston's has a confidential reporting portal called Speak Up which is provided by an independent third party. You can access the portal website through the following link: <https://marstons.integrityline.com/> or by scanning the below QR code.



Concerns raised via the Speak Up portal will be reviewed and actioned by the Legal Services team, who will instruct an appropriate Investigation Team. Anonymised reporting will be provided to a committee of the Board at least annually.

Our grievance policy designed to enable all employees to raise concerns and/or complaints about the conduct of other co-workers, managers or other issues about which they feel aggrieved. You can raise a grievance by emailing [ER@marstons.co.uk](mailto:ER@marstons.co.uk). You can also use your Employee Assistance Programme for any queries. AXA is available for our Pub Support Centre team members and the Licensed Trade Charity for our Pub team members.



# #ItStopsWithMePledge

## Zero Tolerance for Discrimination and Harassment

We've taken the #ItStopsWithMe pledge, committing to act against harassment and discrimination in the hospitality industry. It's our priority to ensure everyone is safe and well in our pubs and Pub Support Centre.

We will not tolerate inappropriate conduct. We will not tolerate unfair treatment. And we will not tolerate unwelcome sexual advances.

At Marston's, we are working hard to create an inclusive environment where everyone feels valued and respected. We recognise that harassment and discrimination can have a significant impact on a person's physical and mental wellbeing, which is why we are providing our managers with the tools and resources they need to support their teams.

Every employee, regardless of role, is responsible for upholding this commitment:

- Zero tolerance for discrimination, harassment, bullying, or exclusion based on race, gender, sexuality, disability, age, religion, or any protected characteristic.
- Take action if you see something wrong — whether it involves a guest, team member, or manager/partner.
- Report concerns safely and confidentially through our confidential reporting hotline **Speak Up**.
- Support each other — be an active ally and back up those who need it.

It's time to take a stand against harassment and discrimination. If you witness or experience any form of harassment or discrimination, please speak up and call it out. We all have a responsibility to make our environment safe and inclusive for everyone



## Unconscious Bias:

Unconscious bias refers to the automatic judgments and assumptions we all make based on our background, experiences, or stereotypes, often without realising it. These biases can affect how we treat others, how we make decisions, and how inclusive our workplaces truly are.

At Marston's, we understand that unconscious bias is a natural part of being human, but it's our responsibility to challenge it. Bias becomes a problem when it goes unchecked — leading to unfair outcomes in recruitment, team dynamics, performance reviews, and service.

We are committed to:

- Raising awareness of unconscious bias across our teams
- Providing training and tools to help team members reflect and learn
- Encouraging open conversations and a culture of self-awareness
- Designing processes that reduce the influence of bias in decision-making

Awareness is the first step to fairness. Everyone has a role to play in recognising and challenging bias to ensure decision-making is inclusive, objective, and respectful.



# Recruitment and Selection

We are committed to creating an equitable, diverse and inclusive culture and will apply the principles of equal opportunities at all stages of the recruitment and selection and promotion processes. In all cases, recruitment or promotion will be based on merit, skill, experience, aptitude and appropriateness, and the principle of recruiting the person who is best suited for the role. Discrimination in any form will not be tolerated, and we are committed to eliminating unconscious bias from our recruitment and selection processes. Candidates with disabilities will be given due consideration, with reasonable adjustments made to accommodate their needs, including adjustments to working arrangements or physical features in the workplace. Additionally, all candidates will be offered reasonable adjustments to the recruitment process and where requested, these will also be made implemented to ensure that no candidate is disadvantaged due to their disability.

We are required by law to ensure that all our employees are eligible to work in the UK. All prospective employees, regardless of nationality, must be able to produce original, eligible documents (such as a passport) before employment starts, to satisfy current immigration legislation. More guidance can be found here ([LINK Prove your right to work to an employer: Overview - GOV.UK](#))

Where possible, and to ensure that this policy is operating effectively, we will monitor and identify groups that may be underrepresented or disadvantaged in our organisation. This includes collecting and analysing diversity data during the recruitment process, which informs focused actions and helps us build a workforce that reflects the communities we serve. All personal information is protected in accordance with our data policy.

For more information see our Recruitment Policy: **Inclusive Behaviour and Fairness at Work**



# Recruitment and Selection

We want all our team members to thrive. Inclusion isn't a box to tick — it's a shared way of working. We encourage everyone to support different communities by being an Ally and championing the following ways of working: -

## Team Member Responsibility- Everyone Must

- Treat everyone with dignity, fairness, and respect
- Avoid assumptions, stereotypes, and favouritism
- Use inclusive language and role model our values and behaviours
- Participate in relevant training and development
- Speak up when witnessing exclusion or mistreatment
- Role model behaviour to champion the commitment to ED&I at Marston's

## Company Responsibility

- Providing policies, training, and tools to support inclusion
- Ensuring fair access to opportunities across the business
- Monitoring and reviewing diversity and inclusion performance
- Fostering a culture of openness, safety, and accountability
- Taking appropriate action when issues are raised
- Providing a community for our people to connect through our Employee led Network Groups

## Line Manager Responsibility

- Make fair and objective decisions in recruitment, scheduling, and progression
- Ensure all voices are heard and respected
- Handle concerns or complaints promptly and appropriately
- Promote equal access to training and development
- Role model our Values and Behaviours, championing our commitment to ED&I at Marston's
- Set the tone for inclusive and respectful conduct



# Allyship, Contact & Support and Networks

## Allyship

Allyship refers to the actions, behaviours, and practices that people take to support, amplify, and advocate with others, especially with individuals who don't belong to the same social identity groups as themselves. Speaking up as an ally involves using your privilege or position to support marginalized or underrepresented groups.

## Contact & Support

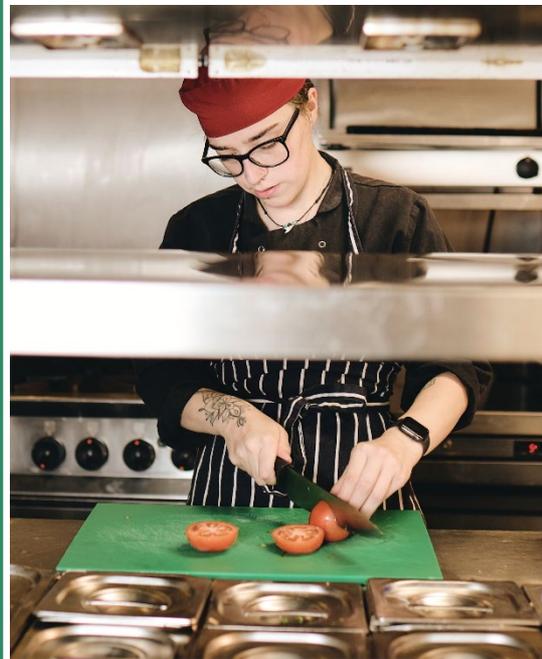
Recognising the sensitivities that may arise from equality, diversity, and inclusion situations, our policy commits to providing clear signposting to support resources ensuring that all employees and line managers know where to seek confidential advice, whether from the People Team, external helplines, or legal experts, so that everyone feels empowered and supported when navigating complex or sensitive situations.

## Come as You Are Networks:

Our employee network groups support our ED&I plans and activities. They create a community for our People to connect, share their thoughts and experiences, influence real change and work collaboratively with the business to deliver our business and ED&I strategy.

We have 6 employee led networks supported by Wellbeing Champions, led by the ED&I Taskforce, where you can find a community of people to support you or your team members and we would encourage you, as an ally to actively participate in ED&I initiatives led by these networks. All information on our networks can be found on The HUB or our Campus Come as You Are Channel.

PRIDE Network LGBTQAI+ Community  
WOMEN's Network  
Men's Network  
Accessibility Network  
AGE Network  
CORE Network- Cultural Origin Religion and Ethnicity



# Training, Awareness, Charitable Partnerships and Resources

## Training and Awareness Guides Available

We have a host of mandatory and optional training modules to help you, and the team to upskill on different topics of interest. These can be found on

- Come as You Are Channel
- Bullying and Harassment Module\*\* (Mandatory for line managers)
- Burnt Chef Modules
- Disability Confidence Module
- Disability Awareness Module
- LGBTQAI+ Module

## Charitable Partnerships and Resources

To ensure we are continuously learning as a business, to ensure we are supporting and protecting those who work and visit it, we also seek guidance and council from the following charitable partnerships. These websites also host several toolkits that may support you, should you need it.

- WiHTL & DiR
- The Burnt Chef
- Licenced Trade Charity
- AXA
- EPA
- Business Disability Forum
- Disability Confidence for Line Managers



## Escalation Process & Contacts

If you need support, wish to report an issue, or want to learn more about ED&I at Marston's, please contact:  
Speak Up Portal - Our confidential Speak Up system helps you raise concerns about any suspected wrongdoing at work. This could include things like:

- Health and safety breaches
- Bribery, corruption, theft and fraud
- Environmental or property fraud
- property fraud Employee-related issues (e.g. discrimination and harassment)

*To report a danger, risk or any wrongdoing, simply use this QR code to head straight to our Speak Up confidential whistleblowing system*



People Team representatives - Claire Clarke (PSC) and Jessica Priest (Pubs)

Speak Up Hotline: - [speakup@marstons.co.uk](mailto:speakup@marstons.co.uk)



# Breaches, Further Policy Support and Policy Review

## Breaches

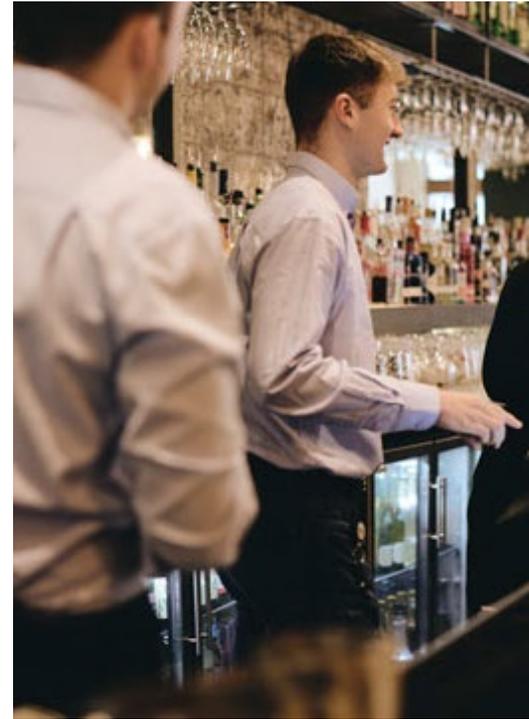
Any Breaches of this policy will be dealt with in line with the company's Disciplinary Policy and may be deemed as gross misconduct, breaches in line with sexual harassment, bullying or victimisation will not be tolerated and may result in investigation and or dismissal.

## Further Policy Support

- Grievance Policy
- Human Rights Policy
- Whistleblowing Policy
- Modern Slavery Statement
- Recruitment Policy
- Family Leave Policy
- Disciplinary Policy
- Menopause Support Policy

## ED&I Policy Review

This Policy is reviewed annually and updated to reflect legal, social, and organisational developments.



## References and links

- [WiHTL & DiR WiHTL](#)
- [The Burnt Chef The Burnt Chef Project | Hospitality Mental Health Awareness](#)
- [Licenced Trade Charity Licensed Trade Charity \(LTC\) Helping Pub, Bar & Brewery People since 1793](#)
- [AXA Private health insurance UK | Private healthcare in the UK](#)
- [EPA](#)
- [Business Disability Forum Home | Business Disability Forum](#)
- [Disability Confidence for Line Managers](#)

## Definitions

See 'Our Definitions' section of this document

## Policy owner

Jane Murray – Director of Learning, Leadership and Inclusion

## DATE CREATED

October 2025

## CHANGES TO THIS POLICY

This policy is not contractual and we reserve the right to change this policy at any time, so please check back regularly to obtain the latest copy. Where collective bargaining arrangements exist, the Company will consult the elected employee representatives prior to implementing such changes.

