



## Equal Opportunities, Diversity and Harassment Policy

---

Department: Human Resources

Last updated: 06/01/2026

---

Date of issue: 02/08/2022

Serial number: MG06

---

Version: 1.0

## Equal Opportunities and Harassment Policy

(a) This sets out the Company's policy on equal opportunities. Molson Group Limited is committed to a policy of treating all its employees, job applicants, clients, customers and suppliers equally.

**Principles**

(b) There should be no unlawful discrimination on account of age, disability, gender reassignment, political belief, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. These are known as protected characteristics under the legislation.

(c) Discrimination can take the form of a number of possibilities:

- **Direct Discrimination** – where someone is treated less favourably than another person because of a protected characteristic.
- **Indirect Discrimination** – where a rule or a policy that applies to everyone within the organisation can disadvantage people with a particular Protected Characteristic unless that required characteristic can be justified by showing that it was a reasonable characteristic to enable you to manage your business, i.e. that it is 'a proportionate means of achieving a legitimate aim'.
- **Associative Discrimination** – where direct discrimination takes place against a person because they associate with someone who has a Protected Characteristic e.g. where an employee is discriminated against due to her being a carer of her disabled son.
- **Discrimination by Perception** – where direct discrimination takes place against someone because others think they possess a Protected Characteristic, whether they do or not e.g. where an employee is discriminated against because he is thought to be gay even though he is not.

(d) Molson Group Limited will appoint, train, develop, reward and promote on the basis of merit and ability.

(e) All employees have personal responsibility for the practical application of the Company's equal opportunities policy, which extends to the treatment of job applicants, employees, clients, customers, suppliers and visitors.

(f) Special responsibility for the practicable application of the Company's equal opportunities policy falls upon directors, Managers and supervisors involved in the recruitment, selection, promotion and training of employees.

(g) The Company's grievance procedure is available to any employee who believes that he or she may have been unfairly discriminated against. The harassment complaints procedure set out in this policy is available to any employee who believes that he or she may have been harassed. Employees will not be victimised in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.

(h) Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment will be treated as gross misconduct. Allegations of discrimination which are not made in good faith will also be considered as a disciplinary matter. Confidential records of ongoing matters dealt with in accordance with this policy will be kept.

- (i) In the case of any doubt or concern about the application of this policy in any particular instance, consult a Manager.
- (j) The Company will keep under review its policy, procedures and practices on equal opportunities.

#### **Equal Opportunities Code of Practice**

- (k) Molson Group Limited has introduced this equal opportunities policy as a commitment to make full use of the talents and resource of all its employees and to provide a healthy environment which will encourage good and productive working operations within the organisation. This code of practice describes how the policy is to be applied throughout the Company.
- (l) The Company is particularly concerned that equality of opportunity is maintained in the following areas:
  - recruitment and selection;
  - promotion, transfer and training;
  - terms of employment, benefits, facilities and services;
  - grievances and disciplinary procedures;
  - dismissals and redundancies.

#### **Recruitment and Selection**

- (m) The following principles should apply whenever recruitment or selection for positions takes place:
  - individuals will be assessed according to their personal capability to carry out a given job (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act);
  - Jobs should be advertised in places which are likely to attract a wide variety of candidates in order to encourage diversity of the workforce;
  - assumptions that only certain types of person will be able to perform certain types of work must not be made;
  - any qualifications or requirements applied to a job which have or may have the effect of inhibiting applications from certain types of person should only be retained if they can be justified in terms of the job to be done;
  - recruitment solely or primarily by word of mouth should be avoided if its effect is or may be to prevent certain types of person from applying;
  - selection tests should be specifically related to job requirements and should measure the person's actual or inherent ability to do or train for the work;
  - selection tests should be reviewed regularly to ensure they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism;
  - applications from different types of person should be processed in the same way;

- written records of interviews and reasons for appointment and non-appointment should be kept;
- questions should relate to the requirements of the job; if it is necessary to assess whether personal circumstances may affect job performance, this should be done objectively without questions or assumptions being made which are based on stereotyped beliefs about certain types of person;
- where the Company's arrangements for recruitment and selection put disabled people at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or if that is not reasonably practicable, reduce the disadvantage unless objectively justified;
- no decisions regarding recruitment or selection should be made by a person who has not read and understood this policy.

(n) Pre-employment medical questionnaires will not usually be used by the Company unless in the following circumstances:

- To make reasonable adjustment to facilitate interviewing for the job
- Equality monitoring
- To explore whether a prospective employee is able to undertake a function which is intrinsic to the work
- Positive action
- Disability is required for the role

#### **Promotion, Transfer and Training**

(o) The following principles should apply to appointments for promotion, transfer and training:

- assessment criteria and appraisal schemes should be carefully examined to ensure that they are not unlawfully discriminatory;
- assessment criteria and appraisal schemes should be monitored and, where such criteria or schemes result in predominantly one group of workers gaining access to promotion, transfer or training, they will be checked to make sure this is not due to any hidden or indirect discrimination;
- promotion and career development patterns will be monitored to ensure that access to promotion and career development opportunities in particular groups of workers are not unjustifiably being excluded;
- traditional qualifications and requirements for promotion, transfer and training, such as length of service, and age, which may discriminate against certain groups of workers shall be reviewed and will only continue to be applied if genuinely justified;
- policies and practices regarding selection for training, day release and personal development should not result in an imbalance in training between groups of workers unless this is objectively justified;
- where the Company's arrangements in relation to promotion, transfer or training put disabled workers at a substantial disadvantage for a reason

connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless objectively justified.

#### **Terms of Employment, Benefits, Facilities and Services**

(p) The following principles shall apply to terms of employment, benefits, facilities and services:

- the terms of employment, benefits, facilities and services available to workers should be reviewed regularly to ensure that they are provided in a way which is free from unlawful discrimination;
- part-time workers should receive pay, benefits, facilities and services on a pro-rata basis to their full-time comparator unless otherwise objectively justified;
- where the Company's arrangements relating to terms of employment, benefits, facilities and services put disabled workers at a substantial disadvantage due to a reason connected with their disability, reasonable adjustments to the arrangements should be made to eliminate or, if that is not reasonably practicable, reduce the disadvantage unless otherwise objectively justified;
- pay and bonus criteria, policies and arrangements should be carefully examined and monitored, and if it appears that any group of workers are disadvantaged by them they will be checked to make sure that this is not due to any hidden or indirect discrimination.

#### **Grievances, Disciplinary Procedures, Dismissals and Redundancies**

(q) Workers who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an equal opportunities matter will not be disciplined, dismissed or otherwise victimised for having done so;

(r) Any group of workers will not be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group unless there is genuine and lawful justification for this;

(s) Redundancy criteria and procedures will be carefully examined to ensure that they do not operate in an unlawfully discriminatory manner;

(t) The provision of voluntary redundancy benefits will be equally available to all workers concerned unless there is a genuine and lawful justification for doing otherwise.

#### **Diversity**

(u) Diversity is recognising and valuing the benefits of different perspectives, backgrounds and experiences, identifying and acknowledging under-representation, and taking active steps to address it through initiatives, policies, and systemic change.

(v) The Company aims to:

- Encourage equality, diversity and inclusion in the workplace;

- Celebrate individuals' differences and value all employees for their contribution to the Company;
- Educate its employees about the advantages of a diverse workforce and provide training if necessary;
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in this policy. Such information shall be kept separate from employees' personnel files;
- Assess the diversity of the workforce on a regular basis and consider whether any changes need to be made to this policy to increase its effectiveness.

#### **Anti-Harassment and Bullying Policy**

(a) All employees have the right to work in an environment which is free from any form of harassment. The Company is committed to providing a working environment free from harassment and bullying and ensuring all employees are treated, and treat others, with dignity and respect.

(b) The Company values all employees and is fully committed to providing a safe, healthy and fair working environment. Employees will be treated with courtesy, dignity and respect, where they can work and develop without fear of harassment or victimisation. This Policy is designed to help and encourage all employees to achieve and maintain standards without fear of harassment. The Company's rules and this Procedure apply to all employees.

(c) This policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by employees (which may include consultants, contractors and agency workers) and also by third parties such as clients, suppliers or visitors to our premises. Depending on the circumstances, harassment and bullying will be regarded as serious misconduct, and will be dealt with under the Disciplinary Procedure, which could result in dismissal.

(d) The Company acknowledges that it has overall responsibility for the working environment, and the welfare and protection of its employees, and this includes the prevention of harassment. However, the Company believes that all employees are responsible for their own behaviour, both professionally and personally, and expects employees to conduct themselves in a manner which does not cause offence to another person which may amount to harassment. In addition, all employees are expected to ensure colleagues are not subjected to harassment in any form. Everyone has a responsibility to uphold personal dignity and challenge harassment and/or bullying.

(e) The Company will seek to take all reasonable active steps to try to prevent harassment, including sexual harassment, of its employees within the workplace, being harassed by other staff.

(f) This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

(g) It is the Company's policy that the harassment of any of its employees is unacceptable behaviour. Anyone found to be in breach of this policy will be liable to disciplinary action which could result in their dismissal.

**Harassment - What is it?**

(h) Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

(i) It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

(j) Harassment takes many forms, occurs on a variety of different grounds and can be directed at one person or many people. An essential characteristic is that it is unwanted by the recipient and that the recipient finds the conduct offensive or unacceptable. Conduct becomes harassment if it persists once it has been made clear that it is regarded by the recipient as offensive, although a single incident may amount to harassment if sufficiently serious. It is the unwanted nature of the conduct which distinguishes harassment from friendly behaviour which is welcome and mutual. Harassment in the work place can come from a colleague or an external third party.

(k) Harassment can be based on:

- sex
- disability
- gender reassignment
- race
- religion or belief; or
- sexual orientation

(a) Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

(b) Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;

- outing or threatening to out someone as gay or lesbian;
- offensive e-mails, text messages or social media content; or
- mocking, mimicking or belittling a person's disability.

(c) Harassment can occur in a large variety of situations, and the Company is mindful of not making assumptions based on stereotypes, but higher risk scenarios may include:

- a. Two colleagues working together, where there would be no witnesses to any improper behaviour;
- b. Situations where there is a power imbalance, such as a junior and senior colleague working together;
- c. Situations where the majority of people present are of one gender; race or age category;
- d. The presence of alcohol, such as at social events.

(d) Many forms of harassment are a form of unlawful discrimination and contravene the Equality Act 2010. Any employee who harasses another can be held personally liable if the latter undertakes legal proceedings.

(e) Some harassment can also be a criminal offence. Depending on the circumstances, it could render the harasser liable to prosecution. This is not limited to physical or sexual assaults.

(f) A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

### What Is Bullying?

(g) Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

(h) Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about someone's performance;

(i) Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

### Employees' Responsibilities

(j) Bullying and harassment are not acceptable under any circumstances. Every employee has a responsibility to ensure that they do not incite, perpetrate or condone any form of bullying or harassment within the workplace. Any such action

which cannot be resolved on an individual basis, or which is serious, or which continues following a request to stop, will be subject to formal investigation.

- (k) Any employee, regardless of position, found to be responsible for inciting, perpetrating or condoning bullying or harassment may face disciplinary action, up to and including dismissal. Cases where the bullying or harassment has persisted once it has been made clear to the bully or harasser that such behaviour is unwelcome, will be taken very seriously.
- (l) In addition, the harasser can be held personally liable if the person who has been harassed undertakes legal proceedings via an employment tribunal.
- (m) If you witness sexual harassment in the workplace, you should report it. You should talk to the person who has experienced sexual harassment to see whether they want your support, but you do not need the permission of the person who's been sexually harassed in order to report it. You will not be victimised if you make or support a complaint, or act as a witness.

#### Managers' Responsibilities

- (n) All managers and others in charge of groups of staff are responsible for ensuring that bullying and harassment do not occur in the work area. They must ensure that:
- (o) They fully understand bullying and harassment policy and are able to offer advice on the procedure when required to do so.
  - a. They advise and inform their team to increase awareness and understanding of the Company's Anti-Harassment and Bullying Policy.
  - b. They publicly promote the Company's Anti-Harassment and Bullying Policy.
  - c. Their work environment is free of visual harassment, e.g. pin-ups and graffiti.
  - d. They are alert to bullying, physical and verbal harassment in their work area and deal with it immediately, whether or not it is brought formally to their attention.
  - e. They are supportive of individuals who state they have been bullied or harassed and take full account of their feelings and perception of the situation.
  - f. They maintain complete confidentiality relating to all aspects of cases of bullying or harassment at all times and do not mention or discuss the case unnecessarily with any person not involved in its investigation.
  - g. Following alleged bullying/harassment there is no further bullying, harassment or victimisation.
  - h. They do not participate in, encourage or condone gossip relating to cases of actual or alleged bullying and harassment and take appropriate steps to prevent or stop such gossip in their work area.
  - i. They attend any training sessions which may be arranged to increase their

awareness of the issues involved in bullying and harassment.

### Company Responsibilities

(p) In order to prevent harassment, we will take measures such as:

- a. Training managers to recognise behaviours which may amount to bullying and harassment and to how best to intervene.
- b. Encouraging employees to report any harassment which they experience, or which they witness, including from third parties such as clients;
- c. Taking such issues seriously, listening sympathetically and keeping an open mind;
- d. Taking disciplinary action against harassers when appropriate;
- e. Not treating people who raise a complaint in good faith to any detriment for doing so;
- f. Regularly reviewing the risk of harassment in the workplace;
- g. While being mindful of data protection and confidentiality, keeping a record of sexual harassment complaints to watch for any patterns of unwanted behaviour
- h. Making it clear to third parties that harassment will not be tolerated, and providing them with a copy of this policy;
- i. Setting up a system by which members of staff can submit concerns anonymously if they feel unable to identify themselves. This can be done by e-mailing HR using an e-mail address with a false name, especially set up for this purpose;
- j. With more serious cases, considering paid time off work in order to get help with any resulting physical or mental health problems

(q) We will assess the risk of harassment in the workplace and keep our risk assessment under regular review. We encourage you to come forward with any areas in which you believe harassment protection could be improved. Please let your line manager know.

### Procedure

(l) Due to the seriousness with which the Company views harassment (including sexual harassment) and bullying, informal and formal reporting procedures have been introduced which are separate from the Grievance Procedure as a mechanism for dealing with complaints of harassment and bullying.

(m) All allegations of harassment or bullying will be dealt with seriously, promptly and in confidence. Employees who feel they have been subject to harassment must not hesitate in using this procedure nor fear victimisation. Retaliation against an employee who brings a complaint of harassment is a serious disciplinary offence which may constitute gross misconduct.

(n) The Group Head of People and/ or Business Partners will provide, in confidence, advice and assistance to employees subjected to harassment and assist in the resolution of any problems, whether through informal or formal means.

#### **IF YOU ARE BEING HARASSED OR BULLIED: INFORMAL STEPS**

(o) If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your Line Director or another Line Manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

(p) If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your Line Manager informally for confidential advice.

(q) If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below.

#### **RAISING A FORMAL COMPLAINT**

(r) If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your Line Manager, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, you should refer it to a Manager.

(s) Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

(t) As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

#### **FORMAL INVESTIGATIONS**

(u) We will investigate complaints in a timely and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

(v) We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation. You will be given a provisional timetable for the investigation. The investigator will arrange further meetings with

you as appropriate throughout the investigation.

- (w) Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.
- (x) Where your complaint is about someone other than an employee, such as a client, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.
- (y) We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours so as to avoid or minimise contact with the alleged harasser or bully.
- (z) It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- (aa) At the end of the investigation, the investigator will submit a report to a Manager/ Director nominated to consider the complaint. The Manager/ Director will arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the Manager/ Director's findings will be given to you and to the alleged harasser.

#### Action Following The Investigation

- (bb) If the Manager/ Director considers that harassment or bullying has occurred, prompt action will be taken to address it.
- (cc) Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. If the harasser or bully is a third party such as a client or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.
- (dd) Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.
- (ee) Any employee who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure.

## Appeals

- (ff) If you are not satisfied with the outcome you may appeal in writing to Managing Director, stating your full grounds of appeal, within 1 week of the date on which the decision was sent or given to you.
- (gg) We will hold an appeal meeting, as soon as reasonably possible but normally within 2 weeks of receiving your written appeal. This will be dealt with impartially by a Manager/ Director who has not previously been involved in the case (although they may ask anyone previously involved to be present). You may bring a colleague or trade union representative to the meeting.
- (hh) We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further appeal.
- (ii) If necessary we may appoint an external party to undertake elements of the process.

## Protection and Support For Those Involved

- (jj) Employees who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.
- (kk) If you believe you have suffered any such treatment you should inform your Line Manager. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

## Confidentiality and Record-Keeping

- (ll) Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under our Disciplinary Procedure.
- (mm) Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

