

# SBFE – DIVERSITY, EQUITY AND INCLUSION POLICY

## 1. Introduction

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Ensuring that our people feel safe, valued, and included is of paramount importance to Suntory Beverage & Food Europe (“SBFE”). We want to create a working environment where everyone is welcome, treated fairly, made part of our community, and supported to thrive. Everyone working for and with SBFE should be able to be their authentic selves and should not suffer discrimination or harassment (including sexual harassment) in any form.

This policy sets out our responsibilities to our people in respect to diversity, equity and inclusion, our expectations for appropriate behaviour among colleagues, and the processes we have in place to deal with situations where those standards are not met.

The principles set out in this policy apply not only in the workplace (including working on location), but also outside the workplace in a work-related context, such as during travel to and from work, customer/supplier events and work related social events.

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## 2. Key Definitions

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### ***Diversity, Equity and Inclusion***

Diversity refers to the range of people who are represented across SBFE. Some examples of characteristics which contribute to diversity in our workplaces are age, ethnicity, religion, sex, gender, sexual orientation, disability and neurodiversity: These are a few of the most common examples, but what is considered within diversity can range widely. Here at SBFE we want to ensure that the perspectives of a diverse range of people are accounted for.

Equity at SBFE means treating everyone in a way that provides each individual with the support they need to perform and develop in the organisation to the greatest extent they can.

Inclusion means enabling everyone to feel safe, valued, comfortable, and able to be their authentic selves at work. To be inclusive is an intentional act, allowing people to feel comfortable speaking up and out, giving them a voice in their teams and the company.

Taken together, diversity, equity and inclusion are about creating a workplace where everyone can be themselves and perform and develop to their best ability.

We expect all colleagues to embody SBFE's culture and standards; at its absolute minimum, this means that our people should be able to be themselves without being subject to discrimination or harassment.

### ***Discrimination***

Discrimination is the unjust treatment of someone based on their characteristics or the perception of who they are.

Some basic examples of discrimination include (but are not limited to):

- intentionally or unintentionally not selecting someone for a role or promotion because of their race;
- claiming that someone is unable to do a certain job because of their gender;
- speaking down to someone because of a disability;
- excluding or isolating someone because of their sexuality; and
- retaliating against someone who has raised a complaint or supported someone else's complaint about discrimination or harassment.

Discriminating against people based on their identity – who they are – is not only unacceptable in our workplace, it is very often illegal and could lead to civil or criminal prosecution in any of our SBFE markets.

What is a protected characteristic by law varies by country. However, discrimination or harassment on the basis of any of the following characteristics will not be tolerated anywhere within SBFE: age; disability; race (including nationality, ethnic or national origin); language, religion or belief; sex; gender/gender identity; sexual orientation; gender reassignment; being married or in a civil partnership; being pregnant on maternity leave or other family situation/status; part time or permanent status; union membership; membership of the travelling community; or, any personal background of any person, such as socio-economic status.

### ***Harassment***

Harassment includes subjecting an individual to unwanted behaviour, pressure, or intimidation that someone finds offensive or that makes them feel intimidated, threatened or humiliated.

Harassment can be verbal, written (including through digital channels, text or WhatsApp messages and social media), physical, visual or sexual. The behaviour may be persistent, or it may be an isolated incident. Behaviour may be directed at one individual or a number of individuals.

Sexual harassment is any conduct which is sexual in nature and which has the purpose or effect of violating a person's dignity and creates an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Some typical examples of things that may be considered harassment include, but are not limited to:

- unwanted touching or physical contact;
- obscene or offensive gestures;
- making offensive 'jokes', 'banter' or gossip;
- calling people by inappropriate nicknames;
- sexually suggestive remarks;
- isolation or non-cooperation or exclusion from activities;
- displaying offensive material;
- unwelcome remarks about a person's dress or appearance;
- pressure to participate in political or religious groups; and
- unwelcome sexual propositions or questions relating to sex.

Harassment is not acceptable in any form, but it may also be unlawful in many cases and individuals may be held personally liable for their actions. In some cases, their behaviour may also amount to a criminal offence.

## **Grievance**

A grievance in the context of SBFE is an issue that you raise through formal People and Culture (P&C) channels with regard to any aspect of your employment. Discrimination and harassment are both examples of issues that may lead to you raising a grievance, but grievances can be about almost anything of concern. Please see information below about applicable grievance policies if you wish to raise a concern.

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### **3. Who this Policy supports?**

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We believe that equity and inclusion should be the norm across all areas of our business, including in our relationships with partners. Therefore, the standards described in this policy apply to all employees and all customers, partners, freelancers, vendors and suppliers in the context of their relationship with SBFE and its employees. Neither our employees nor partners should face discrimination or harassment in any aspect of their dealing with SBFE.

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### **4. Our commitment to our people**

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We are committed to creating and maintaining an equitable and inclusive environment for our people, respecting the diversity of our people. We will do so by taking the following actions:

- Creating and using this policy to make clear our beliefs, expectations and processes around discrimination and harassment;
  - Providing clear processes for employees to raise issues and concerns with us, with multiple points of contact for employees to reach out to;
  - Providing support for those who experience discrimination or harassment in SBFE;
  - Wherever possible, working for resolution of issues raised to us;
  - Providing education on matters of diversity, equity and inclusion to our employees, particularly at the point at which a complaint is being raised against someone;
  - Dealing appropriately and fairly with the alleged perpetrators of discrimination or harassment; and
  - Proactively monitoring and acting on signs of discrimination within the company culture, including by regularly ensuring that our processes in this area are fit for purpose.
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### **5. What we expect from our people**

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We expect our people to act in a way that supports and encourages a diverse, equal and inclusive culture at SBFE.

No individual may discriminate against or harass anyone else. This is a breach of our expectations and our policies (and may be against the law) and will be dealt with accordingly.

In addition, all employees and partners must:

- Not persuade or influence others to discriminate against or harass anyone else;

- Not victimise, retaliate or otherwise penalise anyone who has raised a grievance in respect of discrimination or harassment; and
- Co-operate with all measures introduced to ensure non-discrimination.

We strongly encourage our employees to inform their line manager, P&C team or other responsible party if they witness discrimination, harassment or abuse taking place, if they feel comfortable to do so.

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## 6. How to take action on issues and concerns

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We have effective ways for dealing with any issues that you have faced as an employee at SBFE. No issue is too small to be raised – we want you to tell us if you are facing a serious problem, but we also want you to let us know when there are things in our company culture or the behaviour of colleagues or partners that you think are not right. We take every care to ensure that all issues are dealt with carefully and properly. It is critical for the success of our company culture that we hear about and deal with problems, and support our people with any issues they are facing.

### **If you have been harassed or discriminated against, or have another issue to do with diversity, equity and inclusion:**

If you have been, or are being, harassed in any way by a colleague, partner or anyone else you come into contact with at SBFE we have specific policies and processes to support you. Please refer to the P&C policies available on the My Suntory People & Culture Hub and Splash for further information, but in summary:

- You can raise your issue with your line manager or someone in the P&C team. All conversations will be treated confidentially wherever possible and will be treated with seriousness and respect.
- Once we are aware of the issue, we will explore the issue with you, agree actions to resolve it, and provide you with the right support moving forwards.
- Where appropriate (or otherwise required by law), we will proceed with our formal process of investigation and resolution. You will have the right of appeal against any outcome.

You can also use our whistleblower service, Safecall. You can find information on how to do this in the Ethics and Compliance Hotline Policy which is available via Splash.

There may be some circumstances where we are obliged to disclose some of the information to a third party, for example where the issue leads to disciplinary action against another employee.

### **If you have witnessed discrimination or harassment**

If you have seen someone else being discriminated against or harassed, we encourage you to take action to support that person. Depending on what you feel most comfortable doing and is most appropriate in the circumstances, you can take one or more of the following actions:

- Offer support and speak up in the moment at which the issue is occurring;
- Approach the person being discriminated against or harassed to support them in talking to their line manager or the P&C team to get support and resolve the issue;
- Speak privately with the perpetrator of discrimination or harassment to raise your concerns and, if appropriate, direct the perpetrator towards educational and awareness-raising resources that may help resolve the issue, e.g. our Diversity Dictionary which is available via Splash

- Speak to your manager or the P&C team to alert them to the issue. They will approach the person being discriminated against or harassed and work to support them and resolve the issue; or
- Use our whistleblower service, Safecall. You can find information on how to do this in the Ethics and Compliance Hotline Policy which is available via Splash.

### **If you have broader concerns or ideas about equity and inclusion at SBFE**

We have a dedicated email address for concerns or ideas about equity or inclusion at SBFE: [belonging.together@suntory.com](mailto:belonging.together@suntory.com). This mailbox is monitored by certain members of the P&C and Legal team who will distribute and reply to issues and ideas in the appropriate way.

You can also talk to your manager or P&C team about equity or inclusion issues.

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## **7. The outcome of raising an issues**

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Issues to do with diversity, equity and inclusion are often complex. We are committed to following our processes in the most sensitive and effective ways as are reasonably possible, and to providing the right support for people subject to discrimination and harassment, with the right resolution wherever possible.

### **The perpetrator**

For the perpetrator of discrimination or harassment, the outcome will depend on the nature and severity of the issue. Discrimination and harassment in all forms are acts of violence, and we never condone them. However, we also recognise that not all issues are equal in this area and that the appropriate response will depend on a variety of factors.

In cases where it is appropriate, we are committed to providing education, training and information to perpetrators to try and resolve issues quickly and effectively. We will also provide facilitated conversations to resolve issues where possible.

However, we will also not hesitate to proceed with disciplinary action in cases where it is appropriate or otherwise required by law.

### **The survivor and witnesses**

SBFE aims to encourage openness and will support anyone who raises genuine concerns under this Policy, whether as the recipient of discrimination or harassment, or as a witness of it. We strongly believe that those who suffer discrimination or harassment, as well as those who witness and report it, should not suffer any victimisation or retaliation because of having raised an issue.

We will do all that we can to support and protect survivors and others who raise issues, including taking disciplinary action against those who carry out any victimisation or retaliation. SBFE is committed to ensuring that no one suffers detrimental treatment as a result of reporting their suspicions or concerns.

We will protect all workers from victimisation, coercion, intimidation, retaliation, interference or discrimination for reporting in good faith any alleged issues under this Policy, or participating in an investigation in respect of such issue.

If you believe you have suffered any form of victimisation or detrimental treatment connected with raising a concern under this Policy, you should inform a member of the P&C Team promptly, SBFE will

consider whether it is appropriate to take disciplinary action, including the suitability of termination, against anyone who threatens, or engages in victimisation or retaliation against or harassment of:

- a. Any worker who has reported, or is considering reporting a concern in good faith; and/or
- b. Anyone who helps a worker report a concern (including colleagues or family members).

SBFE will protect any worker who raises a concern under this Policy honestly, but it is a serious violation of the SBFE Code of Business Conduct to knowingly make a false accusation, to lie or to withhold information from an investigation, and this may result in the imposition of appropriate disciplinary action. Honest reporting does not mean you have to be right when you raise a concern; you just have to have reasonable grounds to believe that the information you are providing is true in the light of the circumstances and information available to you at the time of reporting. No disciplinary action will be taken against any person who raises a concern under this policy honestly.

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## 8. Resources for further support

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We are committed to training our people on strategies to prevent discrimination or harassment. Whatever you may be facing in relation to diversity, equity and inclusion, our P&C team and your line manager are here to support you. We would also welcome your questions, concerns, or ideas for making SBFE more inclusive. If you feel unable to take either of these routes, you can also contact any manager you feel comfortable speaking to, who will help you navigate the best way to deal with your issue.

However, we recognise that in some circumstances, you may want to speak to someone who is able to offer more than workplace support, and there are various different external organisations providing support in each of the countries in which we operate. If you are unsure who to speak to, you can always [contact Safecall](#), our independent whistleblower line, speak to a member of the P&C team or your line manager, or email [belonging.together@suntory.com](mailto:belonging.together@suntory.com) where members of our Legal or P&C teams may be able to suggest appropriate external support.

All questions relating to this Policy should be referred to the P&C team.