



Employee Alcohol Policy (EAP)

EMPLOYEE ALCOHOL POLICY CONTENT

- Personal Conduct
- Drinking on Duty
- Company Sponsored Functions
- Company Premises
- Drinking Offences
- Assistance
- Discipline
- Training
- Accountability



Our Guiding Principles



Beer adds to the enjoyment of life for the overwhelming majority of our consumers

We care about the HARMFUL effects of irresponsible alcohol consumption

Alcohol consumption is for adults and a matter of individual judgment and accountability

Information about alcohol consumption should be accurate and balanced

We engage stakeholders and work collectively with them to address irresponsible alcohol consumption

We expect our employees to aspire to high levels of conduct in relation to alcohol consumption



Policy Purpose

1. Is to protect the Delta's Reputation. The reputation of a company is also determined largely by the way its employees behave and are seen to behave. This is particularly true for us in the beer business, and is recognised in our guiding Principles. Our employees are our ambassadors and can enhance our reputation by their responsible attitude towards drinking. The irresponsible consumption or abuse of our products can potentially cause harm to employees, and can jeopardise the Company's reputation.
2. The Company takes pride in its efforts to promote the responsible consumption of its products. This Policy seeks to ensure the health and safety of our employees, to maintain high levels of individual behaviour, and to establish uniform standards for responsible alcohol consumption by employees in a number of different situations.



Scope

1. This Policy sets out uniform procedures for Delta Corporation Limited and all its subsidiaries and associate companies where the Company has management control.
2. This Policy is applicable to all employees including part-time employees, during working hours and in work environments and occasions, whether at Company facilities or in company-related settings.
3. The Policy is superseded by our country laws but where there is a conflict between this Policy and the country laws, the company will endeavour to influence policy to comply with this Policy.



Alcohol Consumption and Appropriate Behaviour

Personal conduct

- The consumption of alcohol is a personal choice.
- No one should feel pressurised to drink, or made to feel embarrassed as a result of their decision not to drink.
- Employees should aspire to high levels of conduct in relation to alcohol consumption and at all times are solely accountable for their conduct.

Drinking on duty

- No alcohol may be consumed whilst on duty, and being under the influence of alcohol whilst on duty is not permissible. This will lead to disciplinary action and the employee, if found guilty, may be dismissed.
- The following circumstances are exceptions to this rule:
 - Official taste testers or members of taste panels, so long as the activity is done in a designated tasting area;
 - Entertainment of company guests in the course of employment; and
 - Participation in a company-sponsored promotion, event, or function.
- Employees drinking under the above exceptions are expected to drink responsibly, and to arrange alternative transport as needed so as not to drive over the legal Blood Alcohol Concentration Limit (BAC).
- Being under the influence of alcohol (i.e., over the legal BAC limit for driving or having impaired motor skills) whilst on duty is never permissible.



Company-Sponsored Functions and Events

Company sponsored functions and events for employees shall:

- have a designated company manager in charge of the function who is present at all times and who assumes responsibility for the function.
- have non-alcoholic beverages, snacks or food available
- include reminders about responsible alcohol consumption
- make alternative transport available to attendees who may need it.
- designate an end time for the event after which alcohol shall not be served.
- have trained bartenders or servers who are instructed not to serve intoxicated or underage people, and to request proof of age from employee's guests as appropriate.





Company Premises

- The consumption of beer or any alcoholic beverage on Company premises is only permitted in officially designated pubs, hospitality and special event areas, or in official taste rooms.
- All company pubs shall have posted hours of operation during which alcohol may be served.





Drinking Offences When Not on Duty

- The Company recognises and respects the right of all employees to engage in activities outside employment that are private in nature and do not in any way conflict with the Company's business interests.
- However, the Company has a reasonable and legitimate interest in protecting its reputation from harm caused by the actions of its employees outside work.
- Any employee convicted of a criminal offence in which the irresponsible consumption of alcohol is a contributing factor will be the subject of disciplinary proceedings.





Drinking Offences When Not on Duty

- The Employee Alcohol Policy offence committed outside work in which the irresponsible consumption of alcohol is a contributing factor, s/he must notify his/her manager as soon as reasonably practicable to enable the manager to take steps to protect the Company's reputation. In the event of disciplinary proceedings, the following factors should be taken into account in determining the appropriate sanction:
 - The effect of the employee's actions on the Company's reputation;
 - The seniority of the employee. Generally the more senior the employee the more likely his/her actions will adversely affect the Company's reputation;
 - The outcome of court proceedings, if applicable. This may be a factor to take into account, but will not be determinative. If damage to the Company's reputation has already occurred, disciplinary action may be appropriate regardless of the eventual outcome of court proceedings;
 - Where drunk driving is alleged by the amount which the employee's blood alcohol concentration was over the legal limit; and
 - Any previous warnings for alcohol-related misconduct.



Alcohol Dependency

- Employees are encouraged to voluntarily seek help where they believe they might be alcohol dependent. This should be indicated to Human Resources at the earliest possible opportunity to permit the Company to assist with arranging treatment from an external service provider, as well as for the employee to avoid possible disciplinary action.
- Employees may also be referred to Human Resources by a manager if alcohol dependence is suspected.
- Information regarding an employee's alcohol dependency or referral to a treatment programme will be kept confidential to protect the employee's privacy, but can be used for general reporting purposes or as required as part of a disciplinary process specified in this Policy.



Alcohol Dependency

- Any necessary absences from work for such treatment will be regarded as sick leave under the conditions of service, provided that the employee follows the agreed rehabilitation programme.
- Each case of alcohol dependency will be reviewed on its own merits. One period of sustained rehabilitation will be paid for by the Company.
- Depending on individual circumstances, and at the Company's sole discretion, this period might be extended and/or additional sick leave granted.
- An employee may be subject to disciplinary action if s/he regresses to the previous state of alcohol dependence following completion of the course of treatment and fails to meet the requirements of the job, or refuses to accept alternative work where appropriate. The outcome of this disciplinary action could lead to the termination of employment.



Discipline

Policy

- Any breach of this Policy will be considered an offence and subject to the Company's disciplinary procedure.

Alcohol dependence

- Alcohol dependence will not be recognised as a special defence to any disciplinary process, although the person presiding at the hearing may take it into account in determining an appropriate sanction.
- Alcohol dependency may only be raised in mitigation of sentence on one occasion.



Discipline

Appropriate Sanction

- In considering an appropriate sanction in a disciplinary matter relating to a breach of this Policy the chairperson of the enquiry will take into account the following as aggravating circumstances, namely:
 - the seniority of the person guilty of the offence (the more senior the employee the more serious the sanction).
 - the impact of the offence on the reputation of the Company or its management.
 - being under the influence of alcohol will not be considered a mitigating factor in any disciplinary proceedings.



Training

- The Company will ensure that all industrial relations training dealing with disciplinary proceedings includes a module relating to the relevant provisions of this Policy.

This is a Drug-Free Workplace!
***We Conduct
Drug Testing***

Review

- This Policy may be reviewed and amended by the Company from time to time. Employees will be notified in writing of any amendments to this Policy.
- It is the responsibility of all employees to abide by the provisions of this Policy and to ensure that their performance and their judgement at work are not impaired by alcohol.





Policy Custodian



- Delta Corporation Limited, Director for Human Resources

