



Wolverhampton Wanderers Football Club

Equality, Diversity & Inclusion Policy

Executive Chairman's Statement

As a Premier League football club, Wolves is driven by progression and the values of determination, humility and togetherness, along with the belief that these values can empower people to lead better lives.

We are very proud that Wolverhampton is a diverse, vibrant and multicultural community, and we believe that by embracing that diversity and making a commitment to increasing representation across all groups who interact with the club, we will improve our business performance, while ultimately providing greater opportunity for all.

The Equality Policy aims to promote our own equality objectives and, in doing so, help to ensure that everyone is treated fairly and with respect. This policy and the requirements of the Equality Act 2010 apply to Wolves ("the club") job applicants, employees, workers, community participants, players, fans and club partners.

The club's commitment is to promote inclusion and to confront and eliminate discrimination whether by reason of age, gender, gender reassignment, sexual orientation, marital status or civil partnership, race, nationality, ethnic origin, religion or belief, ability or disability, pregnancy and maternity and to encourage equal opportunities. These are known as 'protected characteristics' under the Equality Act 2010.




Jeff Shi, Executive Chairman

Purpose

Wolves are committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best. The organisation is also committed against unlawful discrimination against customers or the public.

This policy's purpose is to:

1. Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time
2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:

-  age
-  disability
-  gender reassignment

- 🛡️ marriage or civil partnership
- 🛡️ pregnancy and maternity
- 🛡️ race (including colour, nationality, and ethnic or national origin)
- 🛡️ religion or belief
- 🛡️ sex
- 🛡️ sexual orientation

3. Oppose and avoid all forms of unlawful discrimination. This includes in:

- 🛡️ pay and benefits
- 🛡️ terms and conditions of employment
- 🛡️ dealing with grievances and discipline
- 🛡️ dismissal
- 🛡️ redundancy
- 🛡️ leave for parents
- 🛡️ requests for flexible working
- 🛡️ selection for employment, promotion, training or other development opportunities

Commitments

Wolves commits to:

1. Encouraging equality, diversity and inclusion in the workplace as they are good practice and make business sense.
2. Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

3. Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

4. Making opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
5. Making decisions concerning staff based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Reviewing employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
7. Monitoring 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.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

Implementation

This policy is fully supported by the senior leadership team of Wolves, and a copy of this policy is also published on the club website. The policy is reviewed at intervals of no more than three years, (or when necessary due to changes in legislation) in line with the policy review process.

The Executive Chairman is responsible for the day-to-day implementation of this policy.

Staff in supervisory or management positions must ensure that, as far as they are able, they act immediately if they become aware of any harassment or bullying taking place and are supportive towards any employee who complains of the same.

As an employer we have a responsibility – a 'duty of care' – to look after the wellbeing of our employees.

All employees have a responsibility to understand and comply with this policy at all times and to report any harassment or bullying they are aware of within the workplace to their manager or another manager of the same level, where applicable.

Harassment and bullying may occur between employees outside working hours, for example at work related social functions and this should also be reported so appropriate action can be taken.

However, all parties must be aware that at times managers may be required to make unpopular decisions and give instructions that may not be welcomed by all employees, but these would not normally be construed as harassment or bullying for these reasons alone. Managers are however, responsible for communicating such instructions in an appropriate manner and not to behave in a way which would be perceived as harassment or bullying.

The club implements regular audits designed to assess the level of participation of different sections of the community in the club and takes account of the findings in developing measures to promote and enhance equality in the club.

The club provides access to a rolling programme of training (for example, online, face-to-face, briefings) for all of its players, staff, senior leaders, participants in outreach programmes and other people engaged with the club's activities to raise awareness of both collective and individual responsibilities.

It is a condition of working with Wolves that suppliers:

- 🛡️ Commit to act in accordance with this policy; and
- 🛡️ Support such measures and initiatives that Wolves may institute or take part in to advance the aims of this policy.

Positive Action and Training

The club is committed to equality, inclusion and anti-discrimination. The club commits to a programme of raising awareness and educating, investigating concerns and applying relevant and proportionate sanctions, campaigning, widening diversity and representation and promoting diverse role models, which we believe are all key actions to promote inclusion and eradicate discrimination within football.

Disciplinary and grievance procedures

Details of the organisation's grievance and disciplinary policies and procedures can be found on the club's intranet. This includes with whom an employee should raise a grievance – usually their line manager or HR representative.

Use of the organisation's grievance or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within 3 months of the alleged discrimination.

Complaints and compliance

Wolves considers all forms of discriminatory behaviour, including (but not limited to) behaviour described in the Appendix (pg 6) as unacceptable, and is concerned with ensuring individuals feel able to raise any bona-fide grievance or complaint related to such behaviour without fear of being penalised for doing so.

Appropriate disciplinary action will be taken against any player, match-day fan, staff, Board member, participant in outreach programmes and other people engaged with the club's activities who violate the Policy.

Any person who believes that he or she has been treated in a way that they consider to be in breach of this policy by a player, match-day fan, staff, Board member, participant in outreach programmes and other people engaged with the club's activities should, in the first instance, complain to that person. They can also speak to a member of the Equality Working Group or their line manager.

If this does not resolve the matter, or in the case of allegations of discriminatory behaviour against Wolves, the person may raise the matter formally by writing directly to their Human Resources rep or the Equality Lead, Gurpri Bains – EDI Manager via gurpribains@wolves.co.uk

The club will investigate the complaint personally and appoint a person to do this. The investigation will be conducted impartially, confidentially, and without avoidable delay. Any person against whom a complaint has been made will be informed of what is alleged and be given the opportunity to present their side of the matter.

The parties in question will be notified of the outcome of the investigation, in writing, and reported to the Wolves senior leadership team. If the investigation reveals unacceptable discriminatory behaviour on the part of a person or organisation the club may impose sanctions on that person or organisation in line with its policies. Sanctions may range from a written reminder concerning future









conduct extending to temporary or permanent expulsion from Wolves' activities. In deciding what sanction is appropriate in a particular case the senior leadership team will consider the severity of the matter and take into account any mitigating circumstances.

Where the violation of the EDI Policy by way of harassment, victimisation or discrimination amount to a criminal offence, the appropriate authority will be informed.

In the event that an individual or organisation associated with Wolves is subject to allegations of unlawful discrimination in a court or tribunal, the senior leadership team will co-operate fully with any investigation carried out by the relevant lawful authorities and, subject to the outcome, may consider taking action as above in relation to the matter concerned.

Policies

One Pack - Home (sharepoint.com)

-  Bullying & Harassment Prevention
-  Code of Conduct
-  Domestic Abuse & Stalking
-  Grievance
-  Hate Crime
-  Social Media
-  Mental Health at Work
-  Whistleblowing

APPENDIX

Relevant Legislation

Discrimination has been legally defined through a series of legislative acts, culminating in the current Equality Act 2010 which came into force in October 2010.

Discrimination refers to less favourable treatment on the grounds of a 'protected characteristics'. Under the Equality Act 2010, the protected characteristics are defined as age, disability, gender reassignment, marital or civil partnership status, pregnancy and maternity, race (which includes ethnic or national origin, colour or nationality), religion or belief, sex (gender) and sexual orientation.

Under the Equality Act 2010, individuals are protected from discrimination 'on grounds of' a protected characteristic. This means that individuals will be protected if they have a characteristic, are assumed to have it, associate with someone who has it or with someone who is assumed to have it.

Forms of Discrimination and Discriminatory Behaviour

Direct discrimination

Direct discrimination is defined as less favourable treatment on the grounds of one or more of the protected characteristics.

Indirect discrimination

Indirect discrimination occurs when a provision, criterion or practice is applied to an individual or group that would put persons of a particular characteristic at a particular disadvantage compared with other persons, and any such indirectly discriminatory affect cannot be justified as a proportionate means of achieving a legitimate aim.

Discrimination arising from disability

When a disabled person is treated unfavourably because of something connected with their disability and this unfavourable treatment cannot be justified, this is unlawful. This type of discrimination only relates to disability.

Reasonable Adjustments

When a provision, criterion, practice, or physical feature of our premises places a disabled person at a substantial disadvantage when compared to a non-disabled person, the club will undertake adjustments, so far as a reasonable to avoid or reduce that disadvantage.

Harassment

Harassment is defined as unwanted (sexual) conduct relating to a protected characteristic that has the purpose or effect of violating a person's dignity, or which creates an intimidating or hostile, degrading, humiliating or offensive environment for that person.

Victimisation

It is unlawful to treat a person less favourably because he or she has made allegations or brought proceedings under the anti-discrimination legislation, or because they have helped another person to do so. To do so would constitute victimisation.

Bullying

Bullying is defined as a form of personal harassment involving the misuse of power, influence or position to persistently criticise, humiliate or undermine an individual.

Reviewed and approved by the Wolves Policy Review Group on Wednesday, 20 August 2025.

The Wolves Policy Review Group is a cross-organisational working group comprising relevant stakeholders from across the football club and Wolves Foundation, including from the club's Football Administration department, Legal and Safeguarding teams, Finance, HR department (including Equality, Diversity and Inclusion) and Media department.