



DEPARTMENT	PEOPLE
POLICY/PROCEDURE	BULLYING AND HARASSMENT POLICY
DATE OF ISSUE	JULY 2026
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VERSION	3

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, during business trips and at work-related social events.

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

An employee harasses another employee if they engage in unwanted conduct related to an anti-harassment protected characteristic, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

An employee also harasses another employee if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an employee harasses another employee if they or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee's rejection of or submission to the conduct, they treat that other employee less favorably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the anti-harassment protected characteristic of a third party with whom the employee is associated and not on the employee's own anti-harassment protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where unwanted conduct occurs because it is perceived that an employee has a particular anti-harassment protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different employees find different levels of behaviour acceptable, and everyone has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour which a reasonable person would realise would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples

Bullying and harassment may be verbal, non-verbal, written, or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature.
- subjection to obscene or other sexually suggestive or racist comments or gestures, or other



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derogatory comments or gestures related to an anti-harassment protected characteristic.

- the offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- jokes or pictures of a sexual, sexist, or racial nature or which are otherwise derogatory in relation to an anti-harassment protected characteristic.
- demeaning comments about an employee's appearance.
- questions about an employee's sex life.
- the use of nick names related to an anti-harassment protected characteristic.
- picking on or ridiculing an employee because of an anti-harassment protected characteristic.
- isolating an employee or excluding him or her from social activities or relevant work-related matters because of an anti-harassment protected characteristic.

Reporting complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially, and speedily. The Company will not ignore or treat lightly grievances or complaints of discrimination or harassment from employees.

If an employee wishes to make a complaint of discrimination, you should use the Company's grievance procedure.

With cases of harassment, while the Company encourages employees who believe they are being harassed or bullied to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, you should follow the procedure set out below.

If you wish to make a complaint of harassment, whether against a fellow employee or a third party, such as a client, customer, contractor, or supplier, you should follow the following steps:

1. Firstly, report the incident of harassment to your line manager. If you do not wish to speak to your line manager, you can instead speak to the relevant ExCo member or the Chief Executive Officer.
2. Such reports should be made promptly so that the investigation may proceed, and any action taken expeditiously.
3. All allegations of harassment will be taken seriously. The allegation will be promptly investigated and, as part of the investigation process, you will be interviewed and asked to provide a written witness statement setting out the details of your complaint. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the allegation. For example, the identity of the complainant and the nature of the allegations must be revealed to the alleged harasser so that he or she is able to fairly respond to the allegations. The Company reserves the right to



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arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

4. Once the investigation has been completed, you will be informed in writing of the outcome and the Company's conclusions and decision as soon as possible. The Company is committed to taking appropriate action with respect to all complaints of harassment which are upheld. If appropriate, disciplinary proceedings will be brought against the alleged harasser.
5. You will not be penalised for raising a complaint, even if it is not upheld, unless your complaint was both untrue and made in bad faith.
6. If your complaint is upheld and the harasser remains in the Company's employment, the Company will take all reasonable steps to ensure that you do not have to continue working alongside him or her if you do not wish to do so. The Company will discuss the options with you.
7. If your complaint is not upheld, arrangements will be made for you and the alleged harasser to continue or resume working and to repair working relationships.

Alternatively, you may, if you wish, use the Company's grievance procedure to make a complaint of harassment.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the Company's disciplinary policy and procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary (instant) dismissal. In addition, any manager who had knowledge that such discrimination or harassment had occurred in their department but took no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary policy and procedure.