



ANTI-HARASSMENT (Including Sexual) AND BULLYING POLICY

Purpose

All employees, consultants, officers, contractors, interns, volunteers, agency, casual workers and other third parties are covered by this policy which commits the company to providing a dignified and respectful working environment. It does not form part of the contract you have with us but applies regardless of how long you have been with us.

You should read this policy in conjunction with our policy on equal opportunities, and our grievance procedure. We reserve the right to amend this policy at any time.

This policy applies in the following contexts:

- anywhere on the Company's premises
- anywhere off the Company's premises during work-related business events
- anywhere off the Company's premises during work-related social events
- anywhere off the Company's premises during business trips.

Taking part in any of the following behaviour will lead to disciplinary action under our disciplinary policy, and this may lead to your dismissal for misconduct or gross misconduct:

- harassing or bullying anyone else (as defined in paragraphs 2 and 3 below)
- threatening anyone who raises a harassment or bullying complaint
- retaliating against anyone who raises a harassment or bullying complaint
- making allegations maliciously or in bad faith
- giving false or intentionally misleading information during any investigation.

Before you raise a complaint, you need to remember that the Company has a duty to protect all workers. That means that if you change your mind after complaining — even informally or in confidence — we may choose to investigate anyway, particularly if your allegation is serious. We will however not do so without talking to you first.

You should never be victimised or treated less favourably if you raise a harassment or bullying complaint, and you must inform your manager as soon as possible if you believe you have been subjected to this type of treatment.

What is harassment- Including Sexual?

Our definition of harassment relates to behaviour connected to what is termed a 'protected characteristic' (please see our Equal Opportunities Policy for the definition of this phrase). The policy applies to all forms of harassment and bullying at work including race, (colour, nationality, ethnic or national origins) gender, gender reassignment, age disability, sexual orientation, marriage or civil partnership, pregnancy and maternity, religion or belief or associated reason.

We define as **harassment** any situation where a worker is subject to uninvited conduct that — as an intended or unintended consequence — violates their dignity in connection with a protected characteristic.

We also define as **harassment** behaviour that creates a hostile, humiliating, degrading or similarly offensive environment in relation to a protected characteristic. Name calling, unwanted sexual conduct, lewd comments, excluding colleagues, making insensitive jokes, and displaying pornographic material are all examples of harassment.

Physical, verbal and non-verbal conduct can all amount to **harassment**, and this policy covers isolated or ongoing incidents of offensive behaviour. When someone treats another person less favourably because they either submit to such behaviour or refuse to do so, that can also be interpreted as **harassment**.

Third party **harassment** applies to harassment of our employees by third parties not employed by the company. In such cases and where the company is aware, reasonable steps will be taken to prevent this from happening again.



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In all cases, it is the impact on the victim that matters — whether or not the perpetrator intends to harass their victim is irrelevant.

What is bullying?

We define as **bullying** any behaviour that leaves the victim feeling threatened, intimidated, humiliated, vulnerable or otherwise upset. There is no need to demonstrate a connection with a protected characteristic to establish a bullying allegation.

As with harassment, physical, verbal and non-verbal conduct can all amount to **bullying**. It can take various forms, from extreme behaviour involving violence and intimidation through to subtle actions such as deliberate exclusion, e.g. 'sending someone to Coventry'.

If your manager or colleagues give you constructive criticism about your behaviour or performance, this does not amount to **bullying**. It is part of normal employment and management routine and should not be interpreted as anything different.

How we deal with harassment and bullying

Many issues can be resolved informally, and you should attempt to do this first if you believe you are being bullied or harassed. Start by speaking with whomever you feel is harassing or bullying you and explain that their behaviour is unwelcome, inappropriate, or it upsets you.

Sometimes it is difficult to speak with the perpetrator directly, in which case you should talk to your manager informally and in confidence. Should the issue be with your manager — or if there's another reason you would prefer not to discuss it with them — you must instead speak to the HR representative / manager or a director of the Company.

If resolving the issue proves impossible, you will need to follow our grievance procedure. We will treat your complaint in confidence, as far as is possible, and if we find that you have been the victim of harassment or bullying will take steps to stop it continuing or recurring.

Should we decide that your complaint cannot be substantiated, we will explain why. Either way, we will look at ways of addressing your relationship with the person you accused. We may for example change your work pattern or theirs or suggest counselling or mediation.

Where your complaint is about someone other than an employee, such as a customer, supplier, visitor or other third party, 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.

Protecting confidentiality

Harassment and bullying allegations can raise strong feelings and are always serious, which is why both the Company and the accuser have an obligation to maintain confidentiality as far as possible. This applies at every stage, including the investigation and the result.

If you make a harassment or bullying complaint and fail to maintain proper confidentiality at any time during the process, or you are interviewed in connection with someone else's complaint and likewise fail to maintain confidentiality, you may face action under our disciplinary procedure, and this could lead to dismissal for misconduct or even gross misconduct.

This Policy will be reviewed following any changes to working practices or applicable legislation, or at least annually.

Signed:

Position:

Managing Director

Name:

Lukasz Czerwinski

Date:

01/07/2026

Review Date:

01/07/2027