

The company is committed to providing a workplace free from harassment and bullying, in line with the Equality Act 2010 and the Health and Safety at Work Act 1974. This policy covers harassment or bullying that occurs both in and out of the workplace, such as in your place of work, at events, or at work-related social functions. The policy applies to all individuals working for the Company, including employees, managers, directors, officers, consultants, contractors, home workers, casual and agency workers, and volunteers (collectively referred to as "staff"). It covers bullying and harassment by staff and by third parties, such as customers, suppliers, or visitors to our premises.

Staff must treat colleagues and others with dignity and respect and should always consider whether their words or actions could be perceived as offensive. Even unintentional harassment or bullying is unacceptable. We will take allegations of harassment or bullying seriously and address them promptly and confidentially where possible. Harassment or bullying by an employee will be treated as Misconduct or Gross Misconduct under our Disciplinary Procedure.

Scope and Application

This policy applies to all employees, workers, contractors, agency staff, and anyone engaged by the company, in all work-related settings, including remote work and work-related social events.

What is Harassment?

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- unwanted physical conduct, including touching, pinching, brushing past someone, invading their personal space, and more serious forms of physical or sexual assault.
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless), and suggestions that sexual favours may further a career or that a refusal may hinder it.
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome.
- sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet).
- offensive or intimidating comments or gestures, or insensitive jokes or pranks.
- mocking, mimicking or belittling a person's disability.
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender.
- outing or threatening to out someone as gay or lesbian; or
- ignoring or shunning someone, for example, by deliberately excluding them from a

conversation or a workplace social activity.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them.

What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can also include personal strength and the ability to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- shouting at, being sarcastic towards, ridiculing or demeaning others.
- physical or psychological threats.
- overbearing and intimidating levels of supervision.
- inappropriate or derogatory remarks about someone's performance.
- abuse of authority or power by those in positions of seniority, or
- deliberately excluding someone from meetings or communications without good reason.

Legitimate, reasonable, and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers during their employment, will not amount to bullying on its own.

Informal Steps

Anyone who raises a concern or participates in an investigation will be protected from victimisation. Support is available through our Employee Assistance Programme.

If you are being bullied or harassed, consider initially raising the issue informally with the person responsible, if you feel able to do so. If this is too difficult or embarrassing, you should speak to your manager or HR, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps have not been successful, are not possible, or are not appropriate, you should follow the formal procedure outlined below.

Raising a Formal Complaint

Employees who wish to make a formal complaint about bullying or harassment should follow the Grievance Procedure. All other staff members should submit a formal written complaint to HR.

We will investigate complaints in a timely and confidential manner. The investigation will likely involve meetings with you and others affected or witnesses. Those involved have the right to be accompanied at meetings and to appeal the outcome.

Following the investigation, we will decide on the outcome. If your complaint is upheld, disciplinary or other appropriate action may be taken against the perpetrator(s).

A handwritten signature in blue ink, appearing to be 'PS' or similar initials, written in a cursive style.

Paul Smith, Managing Director
12TH January 2026