

## Eazi-Business Anti-Harassment and Bullying Policy (Internal Use Only)

### About This Policy

This policy covers harassment or bullying which occurs at work or related to work (such as business trips, work-related events or social functions) and whether done by our personnel or by third parties such as clients, suppliers or visitors. We are committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

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### Who We Are

“We” “our” or “us” refers to the licensor company, Eazi-Business Limited. We are a limited company registered in England and Wales with registered number 08364226 and registered office at The Old School House, 65A London Rd, Oadby, Leicester LE2 5DN, UK (also using various trading names such as Eazi-Apps, Eazi-Sites, Eazi-SEO). “We” “our” or “us” also or instead refers to any group company of this company.

We are also the licensor company for many unrelated licensee companies that may use one or more of our trading names. We and all licensees in the network have no responsibility or liability for other licensees, who are all separate legal entities, nor for their personnel.

### Who Must Comply with This Policy

This policy applies to everyone when working for us, with us or on our behalf in any capacity, including employees at all levels, directors, officers, owners, licensees, agency or seconded workers, interns, agents, contractors, consultants, service providers, third-party representatives and business partners.

Our licensees must also ensure compliance within their own business and personnel with this policy or their own policy. Their own policy must include obligations and prohibitions at least at the level of those in this Policy but must be adapted for their local legislation to comply with any additional or further requirements under that legislation.

### There are Other Terms that May Apply to You

There are many other terms that may govern your behaviour at work, as examples only including:

Legal agreements: Your employment, services, supply, sale, licence or network member agreement or terms, plus any ancillary agreements such as non-disclosure agreements

- Our other policies and handbooks: Including for example privacy policies, any staff handbook, equal opportunities policy, anti-bribery policy, website and online tools acceptable use policies, corporate social responsibility and many others that set out our requirements of you
- Legislation or regulation: There are many laws that govern your behaviour including, as examples only, laws relating to non-discrimination, harassment, health and safety, and many others.

## Our Policy

We do not accept, condone, tolerate or allow anything that constitutes either harassment or bullying (see examples and definitions below). You must not do anything directly or indirectly that is either of these. You must not permit any of these by anyone else including your own personnel.

In your behaviour towards other people related to work, you must comply with all applicable legislation, regulations, codes of conduct, policies and any contracts to which you or your employer is a party.

Failure to comply with any of the above may be viewed as a disciplinary matter (and may also become a police matter or reported to relevant authorities) and may have consequences for your ongoing engagement, licence or role with us or your employer.

## What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A person may be harassed even if they were not the intended "target". 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, 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, as examples:

- unwanted physical conduct, including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour (even if you yourself think it is harmless);
- offensive e-mails, messages or social media content;
- mocking, mimicking or belittling a person's disability or personal characteristics.

## What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving 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 and can include personal strength or the power to coerce through fear or intimidation. Bullying can be physical, verbal or non-verbal. Bullying may include, as examples:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about someone or their performance.

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

## If You are Being Harassed or Bullied

If you are being harassed or bullied, consider raising the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to the person to whom you report, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under the grievance procedure of us (or your employer if different).

We will investigate complaints about our own personnel in a timely and confidential manner. We are not responsible for personnel of other companies or licensees. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee, disciplinary action will be taken against them and it will be dealt with as possible misconduct or gross misconduct. If the harasser or bully is a third party such as a client, supplier, visitor or licensee, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

## Protection and Support for Those Involved

Anyone who makes a complaint about harassment or bullying or participates in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way may be subject to disciplinary action or action under any contract with us. However, making a false allegation deliberately or in bad faith is misconduct and anyone doing this may also be subject to disciplinary action or action under any contract with us.

## Record-keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our privacy policy applicable to employees and licensees [[link](#)].

## Laws and Jurisdiction Applicable to Any Disputes

This policy, its subject matter and its formation (and any non-contractual disputes or claims) are governed by English law and subject to the exclusive jurisdiction of the courts of England and Wales.

This policy does not form part of anyone's contract of employment.

## Changes to This Policy

We keep this Policy under review. The date that it was last updated is set out below.

As a result of our reviews, we reserve the right to make changes to this Policy. The current version of this Policy is the one published at the relevant time on our internal website for us, our personnel or licensees.