

Anti-harassment and bullying policy

This policy sets out HR Wallingford Limited's (the "Company") policy on harassment, sexual harassment and bullying and how this will be dealt with should it occur.

HR Wallingford is committed to providing a working environment free from all forms of harassment and bullying and ensuring that all staff are treated, and treat others, with dignity and respect. Harassment (of any form), victimisation or bullying of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated.

This policy also specifically sets out HR Wallingford's position in dealing with sexual harassment at work. The law requires employers to take reasonable steps to prevent sexual harassment of their staff during the course of their employment. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us, or are a third party out of our control. Sexual harassment and victimisation may result in disciplinary action up to and including dismissal, as set out in this policy.

We recognise that harassment (in whatever form) can occur both inside and outside of the workplace. This policy covers all types of harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers harassment and bullying by all staff as well as by third parties such as clients, suppliers and anybody visiting Company premises.

We will take active steps to help prevent harassment, victimisation and bullying of all staff and the purpose of the policy is to:

- Ensure that all employees, consultants, contractors, directors, officers, casual and agency workers and volunteers (collectively referred to as "Staff") regardless of their status, level or grade are aware of what behaviour is unacceptable and the various forms that harassment can take and to ensure that all Staff are free from all forms of harassment, victimisation, intimidation or other forms of bullying at work;
- Explain the risk assessment which has been undertaken by HR Wallingford and the steps that are being taken to reduce the risk of sexual harassment in the workplace;
- Set out clear reporting and complaint procedures, and ensure staff are aware that support is available;
- Explain how we deal with third-party harassment; and
- Provide a framework for line managers to deal with incidents of harassment, sexual harassment, victimisation and bullying.

This policy is non-contractual and does not form part of the terms of your contract with the Company, which are provided to you separately. In the event that the terms

of your contract and this policy differ the terms of your contract shall apply. The Company will review this policy and may amend it from time to time. All Staff will be informed of any amendments to this policy in writing, either by letter or by email.

The Board of the Company in place from time to time ("the Board") has overall responsibility for the operation of this policy and for ensuring that it complies with our legal obligations. The Board has delegated day-to-day responsibility for the operation of this policy to the Personnel Manager.

Communication and awareness of this policy

A copy of this policy will be provided to all employees and they will be invited to raise any questions that they have in respect of its application. All new employees will be provided with a copy of this policy as part of the induction process. All employees are required to complete mandatory e learning training on bullying and harassment and renew the training on an annual basis. This training forms part of the Company's ongoing commitment to raising awareness, supporting the identification of risks, and ensuring compliance with this policy.

Harassment

Harassment is defined in UK legislation as:

- unwanted conduct related to sex, sexual orientation, marital status, civil partner status, race, colour, ethnic or national origin, nationality, religion or belief, disability or age which has the purpose or effect of:
- violating an individual's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual;

Sexual Harassment is considered specifically below at (12).

Examples of conduct amounting to harassment might include:

- unwelcome sexual attention including touching, inappropriate staring and invading personal space;
- subjecting someone to insults or ridicule because of their sexual orientation;
- 'outing' or threatening to 'out' someone as gay or lesbian (whether or not they are heterosexual or homosexual);
- suggesting that sexual favours may in some way further someone's career or that refusing sexual favours may damage it;
- lewd, suggestive or over-familiar behaviour;
- displaying pornographic or sexually suggestive pictures or written material;

- inappropriate comments about a person's clothing or appearance;
- derogatory or patronising forms of address such as 'sweetheart', 'darling', 'love' or 'boy';
- display of material advocating against religious beliefs or sexual life-styles;
- 'making fun' of someone who wears a hearing aid;
- racial name calling; and
- sending 'joke' cards which are at the expense of someone's age.

Please note that you can be harassed even if you are not the intended 'target' of the behaviour. For example, you may be harassed if one of your colleagues makes a racist comment to another colleague which you overhear and find offensive.

You are encouraged to bring any harassment to the attention of your line manager or a senior manager or Personnel without delay.

Sexual Harassment

Sexual Harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature 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 single incident can amount to sexual harassment.

It also includes treating someone less favourably because they have submitted, or refused to submit to, unwanted conduct of a sexual nature, or that is related to gender reassignment or sex either in the past, or present.

Examples of sexual harassment may include:

- Unwanted physical conduct or "horseplay", including brushing up against someone, hugging, touching, pushing, massaging and grabbing;
- Suggestions of sexual activity;
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- Unwelcome sexual advances or suggestive behaviour or noises, E.G catcalling or wolf-whistling;
- Offensive emails, Teams messages, WhatsApp or text messages or social media content;
- Leering, staring or suggestive looks (including looking someone up and down);
- Sexual jokes;
- Intrusive questions about a person's private or sex life;
- Someone discussing their own sex life;
- Commenting on someone's body, appearance or what they are wearing;
- Spreading sexual rumours;
- Standing unnecessarily close to someone;
- Stalking or indecent exposure;
- Taking a photo or video under another's clothing (upskirting).

Sexual Harassment may occur even if the perpetrator perceives the action or comments to be harmless, welcomed or even complimentary. A person may be

sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

Sexual interaction that is invited, mutual or consensual is not sexual harassment because it is not unwanted. However, sexual conduct that has been welcomed in the past, can become unwelcome.

Sexual Harassment is not gender specific. It can happen to men, women and people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex, or anyone of any gender identity.

Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control.

Under the Equality Act 2010, employers have a positive legal duty to take reasonable steps to prevent sexual harassment of their workers – also known as the preventative duty. If employers do not comply with it, they are breaking the law. The preventative duty is designed to improve workplace culture by requiring employers to anticipate how sexual harassment might happen in their workplace and take proactive, reasonable steps to prevent it from happening.

The preventative duty includes worker-on-worker harassment and harassment by third parties, such as clients, professional contacts or suppliers. This policy, along with any associated actions, training and working practices have been implemented to ensure HR Wallingford complies with this legal obligation.

HR Wallingford has undertaken a risk assessment of its business to consider its working practices, policies and procedures, and the control measures that can be implemented to minimise risks. The areas of higher risk in our business have been identified as follows:

- Use of digital communication platforms;
- Third-party contact; and
- Social events (in particular those where alcohol is present).

This is not an exhaustive list of all risks that may face our business. We have taken various actions to address these risks, in addition to the general steps set out in this policy. These include:

- Provision of mandatory training to all staff on sexual harassment, diversity and inclusion. HR Wallingford expects all staff to undertake this training. This training will also form part of the induction programme for new members of staff;
- Providing additional support to managers to assist them in preventing harassment and bullying in the workplace;
- Consideration of setting up equality, diversity and inclusion events and workshops through employee resource groups and encouraging attendance by employees at all levels;
- Carrying out an appropriate audit of the use of communication platforms and social media channels;
- Encourage managers to conduct regular check-ins with employees to check on wellbeing; and
- Review all existing policies to ensure they reflect best practice.

We will continue to assess these risks on a regular basis and ensure that any further reasonable steps that can be taken to reduce these risks, are implemented.

Victimisation

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- Bringing proceedings under the Equality Act 2010;
- Giving evidence or information in connection with proceedings under the Equality Act 2010;
- Doing any other thing for the purposes of or in connection with the Equality Act 2010;
- Alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- Denying someone an opportunity (such as promotion) because it is suspected that they intend to make a complaint about sexual harassment.
- Excluding someone (e.g. from a social event or activities) because they have raised a grievance about sexual harassment.
- Failing to promote someone because they accompanied another staff member to a grievance meeting.
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

Third Party Harassment

Third party harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact with during the course of their employment.

Third party harassment could include, for example, unwelcome sexual advances from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

Third party sexual harassment can result in legal liability and will not be tolerated. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy. Any sexual harassment by a member of staff against a third party may also lead to disciplinary action up to and including dismissal.

We have taken active steps to try and prevent third-party harassment of staff, these steps may include:

- Adopting a robust anti-harassment and bullying policy which explicitly addresses third party sexual harassment. This policy is available to all staff;
- Taking steps to provide comprehensive training to all staff on sexual harassment in the workplace, recognising it, bystander intervention and the consequences of it;
- Providing additional training to managers to ensure they are able to support individuals who are subject to third party harassment;
- Ensuring that HR Wallingford's stance on sexual harassment is communicated to third parties via email and public notices in the workplace; and
- Providing clients with a copy of this sexual harassment policy.

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it from

happening again. These may include warning the harasser about their behaviour, reporting them to their organisation or employer, banning them from our premises, reporting any criminal acts to the police, sharing information with other branches of the business and seeking to terminate any contractual relationship.

Bullying

'Bullying' means intimidating, threatening, malicious or humiliating treatment of an individual which usually involves the misuse of power (whether via a position of responsibility or physical strength or forcefulness of character). Legitimate or constructive criticism of your performance or behaviour and reasonable instructions given in the course of your employment are not bullying. Examples of bullying might include:

- ridiculing or demeaning others, particularly junior colleagues;
- criticising a colleague in public;
- repeatedly putting pressure on subordinates, such as imposing unachievable deadlines; and
- deliberately excluding people from meetings or communications without good reason.

You are encouraged to bring any harassment to the attention of your line manager or a more senior manager or Personnel without delay.

Electronic Communications

Any written communications between our staff relating to work should be conducted solely by email or via Microsoft Teams on HR Wallingford systems. Text messages and WhatsApp should not be used for work-based communications as far as is reasonably practicable.

All staff have a responsibility, regardless of the medium used, when communicating with other members of staff to ensure that their conduct is appropriate, professional and is not in breach of any of our policies. A communication that you may feel is personal with another member of staff, may still constitute sexual harassment.

All staff are expected to comply with HR Wallingford policies and procedures in respect of communication with other members of staff. Failure to do so may result in disciplinary action up to and including dismissal.

Line Managers

All senior leaders, line managers or any individuals with management responsibility play a critical role in creating a workplace free from harassment.

They are expected to model respectful behaviour and visibly promote a positive and inclusive workplace culture where harassment is taken seriously and not tolerated. They are expected to fully understand and appreciate the requirements of this policy and the implications for how they should conduct themselves.

Compliance with this policy for all staff is critical, but particularly for those with management responsibilities. Any failure to comply with this policy will be taken very seriously.

Line Managers and other individuals with management responsibilities are encouraged to proactively be aware of what is happening in the workplace. There may be warning signs that harassment is taking place, this could include:

- A change in behaviour
- Frequent sickness absence

- Comments made in exit interviews
- A sudden drop in performance; or
- Avoidance

Line Managers are encouraged to foster an environment where staff feel safe reporting any incidents and give staff every opportunity to raise issues with them. This can include:

- Informal one-to-one meetings
- Sickness absence or “return-to-work” meetings
- Performance meetings
- “Open-door” meetings/policy
- Employment surveys; and
- Mentoring or staff networks

Relationships at Work

All staff are reminded to be mindful of their legal obligations towards colleagues where personal relationships at work are concerned. This is particularly important for employees who are in a position of authority or in a more senior role. Any communications relating to a personal relationship should not be conducted on HR Wallingford systems.

Policy

Harassment, as described above, is unlawful discrimination under UK law. If you harass or bully colleagues, the Company may be liable for your actions. In addition, you could be personally liable and be joined as a party to any subsequent employment tribunal proceedings. In serious cases, harassment and bullying may amount to a criminal offence for which the harasser can be imprisoned.

Anyone who is a victim of, or witness to, harassment, sexual harassment, victimisation or bullying under this policy is strongly encouraged to report this conduct in accordance with this policy. This enables HR Wallingford to take appropriate action, provide support and put steps in place to prevent any further occurrences.

Staff who witness harassment, sexual harassment or victimisation or bullying in the workplace are strongly encouraged to take appropriate steps to address it. Where appropriate, this may include:

- Intervening where appropriate and only where you feel comfortable to do so;
- Supporting the victim to report it or reporting it on their behalf;
- Reporting the incident where you feel there is a continuing risk if you do not report it; or
- Co-operating in any investigation into the incident.

Harassment or bullying will not be tolerated and any such behaviour is likely to be regarded as gross misconduct and result in dismissal. All employees have a responsibility to ensure that harassment and bullying, either by employees or third parties, does not occur. You must demonstrate respect for your colleagues and their views whilst at work, and you must not harass or bully anyone on any grounds.

If you are unsure whether an incident, or series of incidents amounts to harassment, sexual harassment, victimisation or bullying you should initially contact your line manager or HR department informally for confidential advice.

Please note, the below reporting procedures apply to all incidents of harassment, sexual harassment, victimisation and bullying.

Informal resolutions

You may wish to attempt to resolve the problem in the first instance by explaining to the person responsible why the behaviour is offensive and asking him or her to stop the unwelcome behaviour. This will not always be appropriate, but people can cause offence unintentionally and a quick word to explain how you feel may solve the problem quickly and efficiently.

The intention of the informal stage is to resolve the matter as quickly and amicably as possible. It is particularly appropriate in circumstances where the person responsible may be unaware that he or she is causing offence.

At this stage you may not wish any investigation to take place and where possible your wishes will be complied with. However, you should still report the behaviour to your line manager or senior manager or Personnel without delay.

The formal reporting procedure

If informal resolution is inappropriate or the outcome has been unsatisfactory, the formal procedure may be appropriate.

If you intend to bring a formal complaint of harassment or bullying, you should notify the Personnel Manager. The following procedure will be implemented:

- You will be asked to put your formal complaint in writing setting out the full details of the unwanted conduct including the name of the person you feel is harassing or bullying you, the nature of their actions, the date(s) and time(s) on which the events occurred and what action, if any, you have taken so far to stop it occurring.
- A meeting will be arranged between you and your manager (or, where your complaint concerns your manager, another manager of similar or greater seniority) to discuss your complaint.
- You may be accompanied at that meeting with an employee colleague
- A formal meeting will be held by the Company with the alleged harasser/bully to establish their response to the complaint.
- Further investigations may then be carried out, including interviews with any potential witnesses. A further meeting with you may be required to address information uncovered during the investigation.
- The investigation will be carried out in an independent manner with respect for the rights of all parties. The importance of confidentiality will be stressed to all those involved in the procedure and they will be required not to discuss the complaint with colleagues or friends. Any breach of confidentiality may result in disciplinary proceedings and/or termination of contract, as is set out below.
- In circumstances where it is not appropriate for the alleged harasser/bully and the complainant to work together then consideration will be given to moving the alleged harasser/bully or suspending them while the investigation is ongoing. If this is not possible then the complainant may prefer to remain at home on authorised leave until the matter is resolved.

- Where the complaint concerns someone other than a member of Staff (e.g. a customer) the Company will consider what action may be appropriate to protect you pending the outcome of the investigation, bearing in mind the reasonable needs of the business and our duties to our customers and third parties.
- The Company will aim to complete the investigation as quickly as possible in the circumstances.
- Following an investigation, the evidence will be considered and a decision taken as to what (if any) action is appropriate. If the complaint is upheld, the harasser/bully may face disciplinary proceedings and/or the termination of their contract, as set out below.
- Whether or not the complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the alleged harasser/bully; for example, mediation and/or counselling, a change to duties, workplace location or reporting lines may be appropriate.

Complaints that are unfounded and not made in good faith may result in disciplinary proceedings and/or the termination of your contract, as set out below. Complainants will not, however, be penalised for bringing a complaint in good faith. Victimisation and retaliation against such complainants will not be tolerated and will be treated as gross misconduct in the same way as harassment and bullying.

If you are not satisfied with the outcome you may appeal in writing to the person stated in the outcome letter, stating your full grounds of appeal, within five working days of the date on which the decision was sent or given to you. If the outcome letter does not state the person to whom any appeal should be sent you should send it to the Personnel Manager or, where the Personnel Manager is the person who made the original decision, to a Executive Board Director.

Following receipt of your notice of appeal the Company will organise an appeal meeting with you to discuss the grounds of your appeal. The appeal meeting will normally be held by a manager of greater seniority than the manager who conducted the initial meeting and investigations. You must take all reasonable steps to attend the appeal meeting. You may be accompanied by an employee colleague. After the appeal meeting you will be informed of the Company's decision. The appeal decision is final.

Alternative reporting channels

In addition to the reporting routes set out above, Staff may also raise concerns relating to harassment, sexual harassment, victimisation or bullying through the Company's confidential reporting system. This provides an alternative reporting channel where individuals may prefer not to raise concerns through management or Personnel.

Reports may be made confidentially and, where preferred, anonymously through the Company's independent reporting system, the details of which are set out below:

Webpage: hrwallingford.ethicspoint.com

Mobile: hrwallingfordmobile.ethicspoint.com

Phone number: 0800 026 8050

Concerns raised through this channel will be handled sensitively and appropriately, with due regard to confidentiality and, where relevant, the anonymity of the individual making the report. The Company will review all reports carefully and take such action as it considers appropriate in the circumstances.

Staff who raise concerns in good faith through this policy or via the confidential reporting system will be protected from victimisation or retaliation in accordance with this policy.

Breaches of this policy

All Staff must comply with this policy and any breaches will be taken very seriously.

Any breaches by an employee are likely to be treated as gross misconduct and result in action being taken under the Company's Disciplinary Procedure up to and including summary dismissal.

If any other (non-employee) member of Staff fails to comply with this policy the Company may decide to stop providing that member of Staff with work or terminate their contract with the Company immediately and without notice or compensation.

Where the harasser/bully is a third party, we will consider what action is appropriate in the circumstances.

If you consider that this policy has been breached, you are encouraged to raise your concerns with your manager as soon as possible.

Protection and support for those involved

Staff who make complaints or who participate 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 face disciplinary proceedings and/or the termination of your contract, as is set out above.

If you believe you have suffered any such treatment you should inform your manager as soon as possible. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.

We will monitor the treatment and outcomes of any complaints of harassment and in particular, sexual harassment and victimisation, to ensure that they are properly investigated and resolved, that those who report or act as witnesses are not be victimised, repeated offenders are dealt with appropriately, cultural clashes are identified and resolved, and workforce training is targeted where needed.

Access to confidential counselling services which is available on request for anyone affected by, or accused of, sexual harassment. This is available through our Employee Assistance Programme.

Support and guidance can also be obtained from the following external services:

- The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
- Protect (www.protect-advice.org.uk).
- Victim support (www.victimsupport.org.uk).
- Rape crisis (www.rapecrisis.org.uk).
- Rights of women (England and Wales) (www.rightsofwomen.org.uk).

Confidentiality and record-keeping

Confidentiality is an important part of the procedures provided under this policy. 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. Breach of confidentiality may give rise to disciplinary proceedings and/or termination of contract, as is set out above.

Where appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

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 Data Protection Statement.

Monitoring

We will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation we receive to ensure that they are properly investigated and resolved. HR Wallingford will retain a central register of all information and formal complaints of harassment or discrimination, including those relating to sexual harassment. This will be regularly reviewed to identify any trends and help us to analyse the effectiveness of our policies.

Territory

This policy has been prepared principally with reference to the laws of England and Wales, but the Company is committed to compliance with the laws and regulations of all jurisdictions in which it operates. This policy shall accordingly be read and interpreted, as far as is possible, so that it is line with the applicable legal jurisdiction and the Company reserves the right to depart from the terms of this policy as may be necessary to comply with legal requirements

The policy is reviewed periodically and updated as necessary. This policy may also be reviewed following a formal complaint of harassment or bullying to consider if it was effective at dealing with the issue raised.

Ridha Bentiba

Chief Executive Officer (Joint), HR Wallingford Ltd

Signed:



Date: 13 July 2026

Review date: 13 July 2027