

This policy contains important information regarding your employment with the Company, and you should read it carefully and ensure that you comply with its terms. However, the terms of the policy do not form part of your terms and conditions of employment and they are subject to variation at any time at the Company's discretion.

Related Policies & Procedures

Equal Opportunities Policy
Disciplinary Procedure
Grievance Procedure
Whistleblowing Policy
Data Protection Policy
Health, Safety & Welfare Policy

All of our policies and procedures are available on the Document Control Register or via a member of the HR Team.

1. Policy statement

- 1.1 We are committed to providing a working environment free from harassment, sexual harassment, victimisation and bullying and ensuring all employees are treated, and treat others, with dignity and respect at all times.
- 1.2 We recognize that any form of harassment, victimization or bullying extends beyond the workplace setting and hours, business trips or at work-related events or social functions and/or online or social media harassment that can affect working relationships and hinder a person's ability to perform their role.
- 1.3 Harassment, bullying or victimisation of or by any member of our employees, or anyone they come into contact with during the course of their work, can be unlawful and will not be tolerated by Brand Addition. Such conduct constitutes misconduct or gross misconduct under our Disciplinary Procedure
- 1.4 We take active steps to help prevent the harassment, bullying and victimisation of all our employees. Anyone who is a victim of, or witness to, harassment, bullying or victimisation is encouraged to report it in accordance with this policy.
- 1.5 The HR Team and/or the Line Manager where appropriate will be responsible for carrying out a suitable risk assessment prior to any business trips, work-related events, functions or social trips.

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1.6 Where applicable, we will appoint an 'appropriate person' for each event to oversee risk areas and to be vigilant, for any inappropriate conduct during such events.

2. About this policy

2.1 The purpose of this policy is to set out a framework for line managers to deal with any harassment or bullying that occurs by employees (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

3. Who does this policy apply to?

3.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns. Our obligations and your duties under this policy also extend to job applicants and former employees.

3.2 This policy covers all areas of the business including overseas sites, subject to any applicable local laws.

3.3 This policy applies to conduct which occurs:

- (a) in a work situation;
- (b) during any situation related to work (such as at a social event with colleagues);
- (c) against a colleague or other person connected to us outside of a work situation (including on social media); and/or
- (d) against anyone outside of a work situation where the incident is relevant to a person's suitability to carry out your role relating to our business.

4. Who is responsible for this policy?

4.1 The Group HR Director has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for overseeing its implementation to the HR Department. Suggestions for change should be reported to the Group HR Director.

4.2 Line managers have day-to-day responsibility for this policy, and you should refer any questions about this policy to them in the first instance.

4.3 Employees should disclose any instances of harassment, victimisation or bullying of which they become aware to their line manager or the HR Department.

4.4 The HR Team will be workplace champions against sexual harassment. Employees will be encouraged to volunteer to become workplace champions, alongside our Employee Forum, helping to identify, signpost, report, prevent and/or mitigate the risk of harassment in the workplace.

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5. What is harassment?

- 5.1 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 single incident can amount to harassment.
- 5.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 5.3 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.
- 5.4 Harassment may include, for example:
- (a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
 - (b) continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
 - (c) 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);
 - (d) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
 - (e) racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group, religion or belief, or gender;
 - (f) disclosing or threatening to disclose someone's sexual orientation or gender identity against their wishes;
 - (g) offensive emails, text messages or social media content; or
 - (h) mocking, mimicking or belittling a person's disability.
- 5.5 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 the jokes create an offensive environment.
- 5.6 'Third-party harassment' occurs where a person is 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 during the course of their employment. Third-party harassment could include, for example, derogatory comments about the age, disability, pregnancy, colour, religion or belief, sex or sexual orientation of a member of our employees, from a client, customer or

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supplier visiting our premises, or where a member of our employees is visiting a client, customer or supplier's premises or other location in the course of their employment.

5.7 We will take active steps to try to prevent third-party harassment of employees. All Employees are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy. If any third-party harassment of Employees occurs, we will take steps to remedy any complaints and to prevent it happening again.

6. What is victimisation?

6.1 Victimisation is when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint.

6.2 Victimisation means 'suffering a detriment' because you've done or intend to do a 'protected act'. A 'protected act' means taking action related to discrimination law. This includes:

- making a complaint of discrimination or harassment;
- supporting someone else's complaint;
- gathering information that might lead to a complaint;
- acting as a witness in a complaint; and
- saying something or giving evidence that does not support someone else's complaint

6.3 The law also protects a person from victimisation when someone else thinks the person has done or intends to do any of the things above. Victimisation is a specific type of discrimination under the law (Equality Act 2010), it's different to bullying.

6.3 A 'detriment' means someone experiences one or both of the following:

- being treated worse than before; and/or
- having their situation made worse.

6.4 The ways someone could be victimised include:

- being labelled a troublemaker;
- being left out because they have raised a grievance about harassment;
- being denied an opportunity because it is suspected they intended to make a complaint about harassment; and/or
- being dismissed because they gave evidence on behalf of another employee member.

7. What is bullying?

7.1 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 include both personal strength and the power to coerce through fear or intimidation.

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7.2 Bullying may include physical or psychological threats, overbearing and intimidating levels of supervision or inappropriate derogatory remarks about someone's performance. However, legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on its own.

8. If you are being harassed, victimized or bullied: informal steps

8.1 If you are being harassed or bullied, consider whether you feel able to raise 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, you should speak to your line manager who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your line manager because the complaint concerns him or her, then you should speak informally to the HR Department. If this does not resolve the issue, you should follow the formal procedure below.

8.2 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager or the HR Department informally for confidential advice.

8.3 Employees who witness harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- Intervening where you feel able to do so.
- Supporting the victim to report it or reporting it on their behalf.
- Reporting the incident where you feel there may be a continuing risk if you do not report it.
- Cooperating in any investigation into the incident.

8.4 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below and/or refer to our Grievance Procedure.

9. Raising a formal complaint

9.1 If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your line manager. If the matter concerns your line manager, you should submit it to the HR Department or directly to the Group HR Director, jo.chapman@brandaddition.com. Alternatively, you can choose to contact our Director of Legal pete.jones@thepebblegroup.com or register your concern anonymously via the Whistleblowing Portal <https://thepebblegroup.eqs-integrity.org>.

9.2 Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

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9.3 As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all Employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

9.4 All witnesses will be provided with appropriate support and will be protected from victimisation.

10. Formal investigations

10.1 We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint.

10.2 We will arrange a meeting with you, usually within five working days of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.

10.3 Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. We will also consider what additional action may be appropriate to protect you and other employees pending the outcome of the investigation. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a colleague or trade union representative of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

10.4 Where your complaint is about someone other than an employee (such as a customer, supplier or visitor) 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.

10.5 We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser or bully.

10.6 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

10.7 At the end of the investigation, the investigator will submit a report to a manager. The manager will arrange a meeting with you, usually within five working days of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the manager's findings will be given to you and to the alleged harasser.

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11. Action following the investigation

- 11.1 If the manager considers that harassment or bullying has occurred, prompt action will be taken to address it.
- 11.2 Where the alleged harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that harassment or bullying occurred, prompt action will be taken to address it. We will also consider what additional measures need to be taken to prevent future harassment or bullying of Employees.
- 11.3 If the alleged harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem and prevent a recurrence. This may include, where appropriate, the use of external parties such as the police.
- 11.4 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.
- 11.5 Any employee member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

12. Appeals

- 12.1 If you are not satisfied with the outcome you may appeal in writing to the Group HR Director stating your full grounds of appeal, within five working days of the date on which the decision was sent or given to you.
- 12.2 We will hold an appeal meeting, normally within five working days of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a manager who has not been previously involved in the case. They may ask anyone previously involved to be present. You have the right to bring a colleague or trade union representative to the meeting.
- 12.3 We will confirm our final decision in writing, usually within five working days of the appeal hearing. This is the end of the procedure and there is no further appeal.

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13. Protection and support for those involved

- 13.1 Employees 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 will be subject to disciplinary action under our Disciplinary Procedure.
- 13.2 If you believe you have suffered any such treatment you should inform your line manager or the HR Department. If the matter is not remedied you should raise it formally using our Grievance Procedure or this procedure if appropriate.
- 13.3 We offer access confidential counselling and support which is available on request for anyone affected by, or accused of, bullying or harassment. Please contact the HR Department should you need to access such support.

14. Confidentiality and record-keeping

- 14.1 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 action under our Disciplinary Procedure.
- 14.2 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.
- 14.3 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 Policy.

15. Training

- 15.1 All employees are required to undertake harassment training on an annual basis. All new team members, or those promoted to new roles within the business, will be required to complete harassment training as part of their induction into their new roles.
- 15.2 Training will be recorded for monitoring purposes.

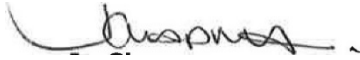
16. Risk Assessment

The HR Team and/or Line Managers will conduct regular risk assessments, which are crucial for ensuring a safe and respectful workplace. Risk assessments help us to identify vulnerable areas through tools like heat maps and implementing targeted prevention strategies to help reduce the level of risk of harassment and create a culture of trust and respect.

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17. Contact Name

If you have any general queries or concerns regarding this policy, please contact the HR Department.



Jo Chapman
Group HR Director