

HARASSMENT

Engic is committed to developing a working environment which is free from harassment, including discrimination, victimisation and bullying. We require all our people to treat each other with mutual respect and dignity.

Purpose:

This policy sets out how Engic ensures appropriate steps to address allegations of harassment.

Scope:

This Policy applies to all Engic people (and potential people) across our global organisation and is reviewed annually.

Any person who believes that they have been subject to harassment must raise it with their line manager, their people and organisation, (P&O), business partner or via the business ethics email.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Anyone who makes such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach of this policy which are found to have been made in bad faith will, however, be dealt with under the employing company's disciplinary procedures.

Engic will endeavour to meet all statutory obligations under the relevant and applicable legislation.

What is harassment?

Harassment of any kind, including reference to sex, sexual orientation, marital or civil partner status, gender identity, gender expression, race, religion or belief, colour, nationality, ethnic or national origin, disability, age, pregnancy or any other status or basis protected by local, national or international law, is unacceptable and will not be tolerated. Harassment is unwanted conduct which has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive working environment. The impact of harassment can result in the recipient feeling discomfort or humiliation or may adversely affect the recipient's job performance and undermine job security or prospects.

Harassment can take many forms, occur on a variety of grounds and may be directed at an individual or group of individuals. It is the impact



of the conduct on the recipient and not the intention of the alleged harasser which will determine what constitutes harassment.

Social interaction in the workplace involving mutually acceptable behaviour should be distinguished from harassment. What may be acceptable to some, may be offensive to others. Certain behaviour will be, by its nature or severity unwelcome even on a single occasion. For this reason, everyone working for Engic must treat their colleagues with respect, dignity and appropriate levels of sensitivity.

Examples of the types of harassment behaviour that Engic seeks to prevent include:

- Unwelcome sexual remarks, jokes or verbal abuse.
- Unwanted or unnecessary physical contact or body contact.
- Suggestive remarks, innuendo or lewd comments.
- Racially derogatory remarks or racist jokes.
- The display of pornographic or other offensive and inappropriate material.
- Deliberate exclusion from work activities on the basis of sex, sexual orientation, marital or civil partner status, gender identity, gender expression, race, religion or belief, nationality, ethnic or national origin, disability or age.
- Ridiculing or demeaning behaviour focused towards a person, or group of people, because of their sex, sexual orientation, marital or civil partner status, gender identity, gender expression, race, religion or belief, nationality, ethnic or national origin, disability or age.
- Jokes about disability or disabled people.
- Patronising or belittling people.
- Discriminatory behaviour which fails to acknowledge the rights and needs of people with different religious beliefs and practices.

The above list is by way of example only and is not exhaustive.

What is bullying and intimidation?

Bullying and/or intimidation often involves threatening, abusive, intimidating or insulting behaviour which may be an abuse of power, position or knowledge. It could include a person in authority abusing their power and bullying subordinates, an individual bullying a colleague or a group of people picking on one individual.

Examples of the types of bullying or intimidating behaviour that Engic seeks to prevent include:

- Severe verbal abuse
- Intimidating or aggressive behaviour
- Excessive teasing or humiliation
- Imposing unrealistic targets inducing ridicule or personal embarrassment
- Unfair and excessive criticism, possibly in front of colleagues
- Isolating or openly ignoring someone
- Physical assault
- Sending abusive or intimidating messages by e-mail

The above list is by way of example only and is not exhaustive.

How will we act against allegations of harassment?

Informal Approach

In certain instances, it may be appropriate for the complainant to approach the alleged perpetrator personally indicating that a particular action is regarded as offensive. The complainant should warn the alleged perpetrator that the behaviour should stop and should if the behaviour continues or be repeated a formal complaint would be made to the alleged perpetrator's line manager or HRM.

Alternatively, the complainant can request their line manager or HRM to speak to the alleged perpetrator informally – this would let the alleged perpetrator know that there has been a complaint and that their behaviour is having an adverse effect on a fellow work colleague. They will also be advised that any such behaviour is contrary to this policy and that continuation of such behaviour would, if substantiated, amount to a serious disciplinary offence. Any action taken at this stage would be informal and confidential.

If the informal approach proves ineffective or the alleged offence is of a serious nature, then it may be necessary to adopt a formal approach.

Formal Approach

At all times, whether or not informal steps have been taken, anyone working for Engic who feels that they have been harassed or bullied may make a formal complaint.

Because of the sensitivity of such complaints and the need to resolve them speedily, the complaint should be made in writing and sent to the complainant's line manager or HRM as soon as possible, with the following information:

- name of the alleged harasser.
- nature of the harassment.
- dates and times the harassment occurred.
- names of any witnesses.
- any action taken by the complainant to resolve the matter informally.

If the allegation is against the line manager, the written complaint should be sent to a more senior level of management.

Every effort will be made to address the issue within a reasonable time period from the receipt of the complaint.

If, after further consideration, the complainant elects not to lodge a formal complaint, HRM may seek to resolve the matter informally by indicating to the alleged perpetrator that there has been a complaint and that their behaviour is having an adverse effect on a fellow work colleague. They would also be advised that any such behaviour is contrary to this policy and that continuation of such behaviour would, if substantiated, amount to a serious disciplinary offence. Any action taken at this stage would be informal and confidential.

Investigation procedure

- Engic owes an equal duty of care to both the person making the complaint and the alleged perpetrator and any allegation will be promptly and sensitively investigated.
- The line manager and/or HRM will ensure that a full investigation is made into any allegation of harassment.
- The complainant and the person against whom the allegations are made will be interviewed separately and the proceedings will be confidential to the extent possible.
- All parties must understand that no victimisation against anyone involved in the investigation of the allegation is to occur.
- Where a complainant and the alleged perpetrator work in proximity to each other it may be necessary to ensure they do not continue to do so whilst the complaint is being investigated. This may necessitate that one or both parties are suspended on full pay or are redeployed or relocated in another part of the organisation. The

determination of whether to suspend, redeploy or relocate one or both of the parties during the investigation will be determined solely by Engic and is not an indication of pre-judgement or guilt.

- Anyone interviewed as part of the investigation into the allegation will be required to respect the need for confidentiality. Any breach of this confidentiality may result in disciplinary action.
- For all formal complaints an accurate written record will be made of the investigation and its conclusion. Both the complainant and alleged perpetrator will be informed in writing of the findings of the investigation and the action to be taken within a reasonable time period after the conclusion of the investigation.
- During any investigation Engic will apply privacy safeguards and will maintain confidentiality to the extent possible.
- If, following investigation, it is found that an instance of harassment or bullying has taken place, appropriate use will be made of the employing company's disciplinary procedure. Disciplinary action up to and including the possibility of dismissal may be taken.
- If it is considered appropriate to issue a disciplinary sanction it may be necessary to consider an alternative post or reallocation of work for the offender in order that they and the complainant do not continue to work in close proximity.
- If, following investigation, it is considered that no bullying or harassment has taken place; any record of the accusation will be removed from the alleged perpetrator's personnel record/file.
- If the complainant or alleged perpetrator is not satisfied with the outcome, then they may ask to have the case reviewed by the next level of management.

Confidentiality

- Engic will respect the particular sensitivity of harassment complaints and their consequences and the need for confidentiality. As a general principle, confidentiality will be agreed and maintained wherever possible. There may be situations where confidentiality has to be broken, and this will be made clear to the complainant. For example, if a complainant tells a line manager or member of HR in confidence something that constitutes an unacceptable risk to the complainant, another person, to Engic or indicates an illegal activity, the recipient of that information may have to act. The decision as to whether a complaint should be progressed normally rests with the complainant, but action may have to be

taken against their wishes to address an unacceptable risk

Name: Christopher Frost
Position: Managing Director
Date: Jan 2023