

ANTI-HARASSMENT & BULLYING POLICY STATEMENT PO-04

1. General

PT Contractors Ltd is committed to providing a working environment free from bullying and harassment. We aim to ensure that all staff are treated, and treat others, with dignity and respect.

This policy covers harassment and bulling which occurs at work and out of the workplace, including on work trips or at work-related events or social functions.

This policy applies to all staff at all levels including employees, management, agency and casual workers, and independent contractors.

For the purpose of this policy, harassment is defined as follows;

Harassment is any unwanted 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. A person may be harassed even if they were not the intended "target". Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

It is unlawful under the Equality Act 2010 to harass a person because of their 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. It also includes conduct of a sexual nature (sexual harassment). Harassment is unacceptable even if it does not fall within any of these categories. Examples of harassment include, but are not limited to:

- Unwanted physical conduct including touching, pinching, pushing and grabbing.
- Unwelcome sexual advances or suggestive behaviour.
- Offensive e-mails, text messages or social media content or the display of offensive materials.
- Unwanted jokes, banter, mocking, mimicking or belittling a person.

For the purpose of this policy, bullying is defined as follows;

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority.

Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media. Examples of bullying include:

- Physical or psychological threats.
- Overbearing and intimidating levels of supervision.
- Inappropriate derogatory remarks about a person or their performance.
- Shouting at staff.
- Persistently picking on people in front of others or in private.
- Blocking promotion and training opportunities.
- Regularly and deliberately ignoring or excluding staff from work activities or work-related social events.



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- Setting a person up to fail by overloading them with work or setting impossible deadlines.
- Regularly making the same person the butt of jokes. Legitimate and reasonable criticism of a staff member's performance or behaviour, or reasonable management instructions, do not amount to bullying.
- Offensive, intimidating, malicious or insulting behaviour intended to undermine, humiliate, denigrate or injure the recipient and an abuse or misuse of power.

Examples of this could be - a manager giving an employee a 'dressing down' in front of work colleagues; a manager consistently giving dirty or boring work to the same person or a person consistently being excluded from workplace meetings, conversations or social events.

2. Responsibilities

- a) The person who has overall and final responsibility for the implementation of the Anti-harassment and Bullying policy within the organisation is Mr P N Trant, Managing Director.
- b) Supervisors must ensure that any person under their control is aware of all company policies and procedures in relation to anti-harassment and bullying and that they comply with them.
- c) If any person experiences, or is witness to, discrimination, harassment or bullying within the workplace, then they should inform either their supervisor or an alternative line manager, so that the appropriate action can be taken to put a stop to it. Where a line manager may be the one being accused, then the incident should be reported/raised with the SHEQ Manager or the Managing Director.

3. Procedure

The company operates a progressive disciplinary and grievance procedure in line with ACAS rules and guidance from Croner, this will outline your terms and conditions of employment. Acts or complaints of discrimination, harassment or bullying will be dealt with through this procedure PR-02-06.

Signed

P.N. TRANT

Managing Director

Date 03/01/2024