

<b>Title:</b>	Anti-Harassment and Bullying Policy	<b>Classification:</b>	Internal
<b>Revision date:</b>	16/10/2024	<b>Doc. Id:</b>	AHBP
<b>Status:</b>	Released	<b>Revision:</b>	V1

## ANTI-HARASSMENT AND BULLYING POLICY

### 1. About this policy

- 1.1 Coolbrook is committed to providing a working environment free from harassment and bullying and ensuring all employees are treated, and treat others, with dignity and respect.
- 1.2 This policy covers 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 bullying and harassment by employees and external workers (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.
- 1.3 This policy does not form part of any employee's contract of employment and the company may amend it at any time.

### 2. What is harassment?

- 2.1 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. Even a single incident can amount to harassment.
- 2.2 It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 2.3 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.
- 2.4 Harassment may include, for example:
  - 1.1.1 Unwanted physical conduct including touching, pinching, pushing and grabbing;
  - 2.4.1 Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
  - 2.4.2 Offensive e-mails, text messages or social media content;
  - 2.4.3 Mocking, mimicking or belittling a person's disability.
- 2.5 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.

### 3. What is bullying?

- 3.1 Bullying can be described as 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.
- 3.2 Bullying might be a regular pattern of behaviour or a one-off incident;
  - 3.2.1 Happen face to face, on social media, in emails or calls;
  - 3.2.2 Happen at work or in work related situations;
  - 3.2.3 Not always be obvious or noticeable to others.
- 3.3 Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
  - 3.3.1 Physical or psychological threats;
  - 3.3.2 Overbearing and intimidating levels of supervision; constantly criticising someone's work, deliberately giving someone a heavier workload than others;
  - 3.3.3 Inappropriate insulting remarks about someone's performance; constantly putting someone down in meetings or an open forum;
  - 3.3.4 Excluding someone from team social events;
  - 3.3.5 Spreading malicious rumours or gossip about someone.
- 3.4 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 their own.
- 3.5 Bullying can also happen from employees upwards towards someone senior. This is sometimes referred to as 'upward bullying' or 'subordinate bullying' and can be from one or a group of employees. This type of bullying can include:
  - 3.5.1 Showing continued disrespect;
  - 3.5.2 Refusing to complete tasks or reasonable instructions;
  - 3.5.3 Spreading rumours or gossip;
  - 3.5.4 Constantly undermining someone's authority;
  - 3.5.5 Doing things to make someone seem unskilled or unable to do their job properly.

#### 4. **If you are being harassed or bullied**

- 4.1 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 or embarrassing, you should speak to your line manager or a member of the HR team, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 4.2 If informal steps are not appropriate, or have not been successful, you should raise the matter formally as guided by the HR team and possible country specific procedures (Grievance Procedure in UK).
- 4.3 The company commits to investigate complaints in a timely and confidential manner. 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. The company will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.
- 4.4 Once the investigation is complete, HR will inform you of the outcome of the investigation. If it is considered you have been harassed or bullied by an employee the matter will be dealt with under formal procedures as per country practices and legislation (Grievance Procedure in UK as a case of possible misconduct or gross misconduct). If the harasser or bully is a third party such as a customer or other visitor, the company will consider appropriate measures to deal with the problem. Whether or not your complaint is upheld, it will be considered how best to manage any ongoing working relationship between you and the person concerned.
- 4.5 Employees who make complaints or who participate in good faith in any investigation must not suffer any form of victimisation as a result. Appropriate measures will be taken if there are any breaches to this principle.

#### 5. **Anti-harassment and bullying training**

- 5.1 Managers will be given appropriate training on recognising and avoiding harassment and bullying in the workplace. HR has overall responsibility for keeping employees up to date on expectations and unacceptable behavior as appropriate.

The company will provide employees with training to ensure that everyone is aware of and understands the contents of this policy and the Diversity, Equity and Inclusion Policy. Following the training, employees will be required to confirm that they have read, understand and will comply with this policy and the Diversity, Equity and Inclusion Policy. An anti-harassment and bullying training will be provided and as part of the onboarding processes.

#### 6. **Record-keeping**

- 6.1 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.