



HARASSMENT POLICY

1 Policy

The Company deplores all forms of unlawful harassment and seeks to ensure that the working environment is sympathetic to all of its employees, irrespective of:

- Age;
- Gender;
- Sexual Orientation;
- Race, colour, nationality, national or ethnic origin;
- Religion; or
- Disability

The Company will not tolerate the harassment of employees on any of the above grounds and those who are responsible for any such harassment will be subjected to disciplinary action, which may include summary dismissal, in accordance with the Company's disciplinary procedure.

Those who believe that they are being subjected to any harassment on any of the above grounds are encouraged to deal with it in accordance with the informal and/or formal procedures set out below.

2 Harassment

Generally speaking, harassment occurs where a person, on any of the grounds identified above, engages in unwanted conduct, which has the purpose or effect of (a) violating another person's dignity, or (b) creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.

Examples of harassment relating to age, sex, sexual orientation, race, colour, nationality, national or ethnic origin, religion and/or disability include:

- Telling or making jokes about any of the above
- Name-calling, including giving any person a nickname related to any of the above
- Making lewd comments
- Unnecessary bodily contact
- Requests for sexual favours
- Speculation about an employee's private and sexual and/or religious activities
- Threatened or actual violence
- Bullying

HARASSMENT POLICY

- Inappropriate use of the internet system, such as downloading/accessing pornography
- Displaying inappropriate material at work, such as calendars or slogans, which may offend any person on any of the above grounds.

This list is not exhaustive.

3 Procedure

Informal Process

The Company would always encourage you to bring unlawful harassment to the attention of a senior member of staff using the formal procedure set out below. However, not all employees want to or are prepared to take formal action.

If you feel that you are a victim of unlawful harassment, and do not wish to take formal action, you are advised to inform your harasser that the behaviour is unacceptable and should stop. Alternatively, you may wish to confide in a colleague, Supervisor or Manager who may be able to speak to the alleged harasser on your behalf to explain how you feel.

If this is not appropriate, your request is ignored and the harassment continues or you would prefer to take more formal action, the formal complaints procedure should be adopted.

Formal Procedure

Step 1

A formal complaint of unlawful harassment should be made in writing and sent in confidence to the Personnel Manager (40 Broadway, London, SW1H 0BT). It should identify: -

- the name of the harasser
- the nature of the harassment
- the specific acts relied upon as constituting harassment
- the dates and times of harassment
- the names of any witnesses to any of the alleged acts of harassment



HARASSMENT POLICY

Step 2

You will be invited to attend a meeting with the Personnel Manager to discuss your complaint and the Company's response. You must take every reasonable step to attend the meeting. As soon as reasonably practicable after the meeting, the Personnel Manager will inform you of the decision in writing and inform you of your right of appeal against the decision if you are not satisfied with it.

Step 3

Should you be dissatisfied with the decision you may appeal to the Managing Director or Chief Executive. The Managing Director or Chief Executive will invite you to an appeal meeting to discuss your grievance, which you must take all reasonable steps to attend. You will be informed of Managing Director's or Chief Executive's decision in writing after the appeal meeting.

General Principles

1. Upon receipt of your formal written complaint, a thorough investigation will be carried out as quickly as possible by the Personnel Department.
2. Whilst the Company will endeavour to deal with your complaint as quickly as possible, the investigation may take some time to complete, depending on the nature of the allegations and the number and availability of witnesses involved. The Company will however deal with the complaint without undue or unreasonable delay.
3. Where necessary, a preliminary meeting may be held with you upon receipt of your written complaint as part of the investigation process, to clarify any issues relating to your complaint.
4. Any named witnesses will normally be interviewed, unless there are good reasons for not doing so. The alleged harasser will be interviewed and given an opportunity to answer the specific allegations and put forward any witnesses.
5. The Step 2 meeting identified above will normally take place after the investigation has been completed.
6. Complaints against the alleged harasser may be dealt with under the disciplinary procedure if there is sufficient evidence to invoke the disciplinary procedure. If the allegations are substantiated, appropriate action will be taken against the alleged harasser, which may include summary dismissal.



HARASSMENT POLICY

7. Any party involved in the investigation is expected to respect the need for confidentiality. Failure to do so will be considered a disciplinary offence. The subject matter of your complaint will therefore be limited to those involved in the investigation, including any witnesses and the alleged harasser.
8. At any meeting conducted under this procedure you have the right to be accompanied by a work colleague or trade union representative.
9. The Company reserves the right to replace any person responsible for conducting any meeting under this procedure with a different person of a suitable level of seniority.