

THE
KENTON
GROUP



Dignity at Work Policy

Introduction

The Kenton Group Limited (the Company) is committed to implementing and promoting measures to protect the dignity of employees and to encourage respect for others at work. This is done by creating a work environment free from harassment, bullying and disrespectful behaviour and by dealing effectively with any complaints of such conduct as may arise. Harassment is unequal treatment and discrimination. Bullying is defined at Section A.3 below.

The aim of this policy is to convey the Company's position to creating a workplace culture free from hostility, in which each member of staff is valued and enabled to develop to their full potential.

Lack of respect may be shown in words, conduct, acts or demeanour. The company values the contribution of all employees and this type of behaviour can demean and damage people.

The company recognises that the issue of whether harassment, bullying or disrespectful behaviour has occurred requires a factual determination based on all evidence received.

The company also recognises that false accusations can have serious effects on innocent men and women. We trust that all employees will continue to act in a responsible and professional manner to maintain a pleasant working environment free of harassment, bullying and disrespectful behaviour. To assist in achieving this goal, no record of a complaint shall be entered in an employee's file unless the matter is dealt with under the disciplinary procedure.

The company will not tolerate harassment, bullying or disrespectful behaviour by one employee of another for any reason.

In particular employees cannot and should not:-

- A. Comment to or about another employee
- B. Harass or bully another employee
- C. Discriminate against each other on any of the following grounds:
 - 1) Gender
 - 2) Marital Status
 - 3) Family Status
 - 4) Sexual Orientation
 - 5) Religious Belief or Lack of Religious Belief
 - 6) Age
 - 7) Disability or the Nature of Disability
 - 8) Race, Colour, Nationality or Ethnic or National Origins
 - 9) Membership of the Traveller Community

Definitions:

1. Harassment

Any act or conduct of an employee including spoken words, gestures or the production, display or circulation of written words, pictures or other material, is harassment of one person by another if the action or other conduct is unwelcome to the recipient and could reasonably be regarded, in relation to the relevant characteristics (i) to (ix) above, as offensive, humiliating or intimidating to that person.

2. Sexual Harassment

Sexual or gender based harassment is unwanted conduct of a sexual nature, or other conduct based on sex affecting the dignity of women and men at work. It can include any act of physical intimacy, any request for sexual favours or any other act or conduct including spoken words, gestures, the production, display or circulation of written words, pictures or other material.

Conduct of this nature is sexual harassment if it is unwelcome to an employee and could reasonably be regarded as due to the employee's gender, or sexually offensive, humiliating or intimidating.

Conduct of this nature by an employee towards a fellow employee will constitute sexual harassment. The company will not tolerate sexual harassment of any form.

3. Bullying

Bullying is behaviour directed at an individual who causes them or is calculated to cause them to feel upset, threatened, humiliated or embarrassed, due to its persistent, offensive abusive, intimidating or malicious content.

4. Lack of Respect

Lack of respect can be shown by direct comments, sarcasm, snide remarks, inappropriate jokes or banter directed towards a colleague. It can also arise where colleagues are ignored, overlooked, avoided or shunned without good reason and in a manner likely to be hurtful or disrespectful. Jokes or comments directed at or referring to a colleague could be thought amusing by others but unpleasant, uncomfortable or hurtful to that colleague. Respect should be shown to all colleagues. Respect is also earned. By showing respect to others and honouring their personal dignity, you will earn their respect.

5. Reporting of Harassment, Bullying and Disrespectful Behaviour

Harassment, Bullying and Disrespectful behaviour of any form as set out above will not be tolerated by the company. Any person who encounters harassment, bullying or disrespectful behaviour themselves or of a colleague should inform the Human Resources Department immediately. You should also report any such behaviour directed at a colleague by any third party such as a supplier or a customer. Allegations of harassment, bullying or disrespectful behaviour will be treated seriously and dealt with sensitively and confidentially.

Where allegations are proven they will be dealt with under the company disciplinary procedure. The penalty imposed will be appropriate to the gravity of the conduct involved and could result in the dismissal of the employee against whom a complaint has been proven. Any victimisation of an employee for reporting an incident, or assisting with an investigation of alleged harassment is a breach of equality legislation and will also be subject to disciplinary action. Depending on the gravity of an allegation or allegations made, the company may opt to deal with the issue under the disciplinary procedure.

6. Progressing a Complaint

You must not ignore a problem or potential problem. Any issue of concern should be brought to the attention of your manager or Human Resources. If the complaint, which you have made, is serious you should be aware that your Manager or Human Resources may consider it their duty to commence an investigation if you are not prepared to proceed with a formal complaint. In making a complaint it is helpful to record any incidents-where, when, and what took place, any witness and copies of any written material.

6.1 Complaints Procedure

Informal Procedure

While in no way diminishing the issue or the effects on individuals, an informal approach can often resolve matters. The objective of this approach is to resolve the difficulty with the minimum of conflict and stress for the parties involved.

- a) Any employee who believes they are being bullied or harassed should explain clearly to the alleged perpetrator(s) that the behaviour in question is unacceptable. In circumstances where you find it difficult to approach the alleged perpetrator(s) directly, you should seek help and advice, on a strictly confidential basis, from a contact person, such as:
 - Your supervisor or manager
 - Any manager in the workplace

- b) Having consulted with the work person, you may request the assistance of the contact person in raising the issue with the alleged perpetrator(s). In this situation the approach of the contact person should be by way of a confidential, non-

confrontational discussion with a view to resolving the issue in an informal low-key manner.

- c) You as the complainant may decide, for whatever reason, to bypass the informational procedure. Choosing not to use the informational procedure shall not reflect negatively on you in the formal procedure.

Formal procedure

If an informal approach is inappropriate or if after the informal stage the bullying or harassment persists, the following procedures should be invoked: -

- a) You should make a formal complaint in writing to your immediate supervisor/manager, or (if the complaint relates to that person), any member of management. The complaint should be confined to precise details of actual incidents of bullying or harassment.
- b) The alleged perpetrator(s) will then be notified in writing that an allegation of bullying or harassment has been made against them. They will be given a copy of your statement and advised that they will have a fair opportunity to respond to the allegation(s).
- c) The complaint will be subject to an initial assessment by a designated impartial member of management, with a view to determining an appropriate course of action.

Such a course of action at this stage could be to explore a mediated solution or other means of resolving the issue informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of complaint will take place with a view to determining the facts and deciding on appropriate action including disciplinary action.

6.2 Investigation:

- a) The investigation will be conducted by either a designated member or members of management or, if deemed appropriate, an independent third party. The investigation will be conducted thoroughly, objectively, with sensitivity and with due respect for the right of both you (the complainant) and the alleged perpetrator(s). Confidentiality will be maintained to the greatest extent consistent with the requirements of a fair investigation.
- b) The alleged perpetrator will be given a copy of the complaint in writing setting out full details of the nature of the complaint and will be given an opportunity to respond.
- c) The investigator(s) will meet with the complainant and alleged perpetrator(s) and any witness or relevant persons on an individual confidential basis with a view to establishing the facts surrounding the allegation(s). Both the complainant and alleged perpetrator(s) may be accompanied by a work colleague if so desired.

- d) Every effort will be made to carry out and complete the investigation as quickly as possible and where possible within an agreed timeframe. On completion of the investigation, the investor(s) will submit a written report to management containing the findings of the investigation. If the complaint is upheld, the report will recommend whether the Company's disciplinary procedure should be invoked.
- e) Both you (the complainant) and the alleged perpetrator(s) will be informed in writing of the findings of the investigation.
- f) If the complaint is upheld, the alleged perpetrator(s) will be interviewed to determine an appropriate course of action. Such action could involve counselling and/or monitoring or progressing the issue through the disciplinary procedure.

A complaint, which is not upheld by the formal investigation, does not necessarily indicate that the complaint was malicious and the employee must not be victimised for having made a complaint.

Document Control:

Issue Number	Date	Reason	Owner
1	09/06/10	Initial Document	B.Corfield
2	21/06/11	Review and new Logo	B.Corfield
3	22/10/13	Reviewed	B.Corfield
4	20/01/14	Security Classification added	B.Corfield
5	23/07/15	Document updated to reflect recent Company changes	B.Corfield
6	20/09/16	Reviewed fit for purpose	B.Corfield
7	30/10/18	Alcohol & substance abuse section removed. Reviewed fit for purpose	C Jones
8	12/02/2020	Reviewed fit for purpose	B. Corfield
9	14/07/2021	Reviewed to ensure HR compliance.	G. Kyle