



Harassment Policy Statement

1. POLICY STATEMENT

The Company seeks to provide a work environment in which all employees are treated with respect and dignity and that is free of harassment based upon an employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, age, marital status or disability. Employees must not harass or intimidate other employees on these grounds. Such harassment not only contravenes Company policy but it may also constitute unlawful discrimination. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure and could render the employee liable to summary dismissal.

- 1.1 All employees are responsible for conducting themselves in accordance with this policy and the Company will not condone any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company.
- 1.2 Employees must not victimise or retaliate against an employee who has made allegations or complaints of harassment, or provided information about such harassment. Such behaviour will be treated as gross misconduct in accordance with the Company's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

2. SCOPE

This policy statement applies to all Oliveti Group employees including Senior Management, sub-contractors and any other individuals working on behalf of Oliveti Group at any time.

3. TRAINING AND EDUCATING EMPLOYEES ON HARASSMENT

Harassment (& bullying) training will be provided to all Oliveti Group Managers.

4. HARASSMENT DEFINED

Harassment is when someone behaves in a way which offends you or makes you feel distressed or intimidated. This takes many forms and can be defined as:-

- Unwanted conduct which is of a sexual or racial nature, or other conduct based on someone's age or gender including an employee's size which affects the dignity of either men or women at work; **or**
- Bullying of colleagues, especially junior colleagues, by intimidatory behaviour; **or**
- Unfavourable conduct at work towards someone based on his/her disability which could affect his/her dignity at work.
- The aforementioned explanations of harassment may manifest in verbal or non-verbal form and could include perceived harassment made by mobile phones in text or digital images.
- A single incident can amount to harassment if sufficiently grave.
- Examples of harassment would include behaviour which embarrasses, humiliates or threatens another, physical intimidation, verbal abuse, threatened or actual violence, insensitive and offensive jokes, deliberate exclusion, lewd, suggestive and/or degrading comments, over-demanding and unreasonable requirements, sexual or racial banter and the display of material with sexual or racial overtones (even if not directed at the complainant).
- Explanations of specific harassment are stated in the following clauses 3.1 to 3.4.



4.1 Sexual Harassment and Harassment on the Grounds of Sexual Orientation

It is against the Company's policy for any employee, male or female, to sexually harass another employee or to harass him or her on the grounds of actual or perceived sexual orientation. Harassment occurs where a person engages in unwanted conduct which has the purpose or effect of violating the other's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, engaging in other unwelcome verbal, non-verbal or physical conduct of a sexual nature, subjection to obscene or other suggestive comments, and sexual jokes or pictures. It is for the complainant to decide for him or herself what they regard as offensive.

4.2 Racial Harassment and Harassment on the Grounds of Religion or Belief

It is against the Company's policy for any employee to harass another employee on the grounds of his or her race, colour, ethnic origin, nationality, national origin or religion or belief. Harassment occurs where a person engages in unwanted conduct which has the purpose or effect of violating the other's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive work environment for the other person. Racial harassment includes, but is not limited to, engaging in unwelcome verbal, non-verbal or physical conduct of a racial nature, subjection to racist comments, and racist jokes or pictures. Racial harassment and harassment on the grounds of religion or belief may comprise intentional bullying which is obvious or violent but it can also be unintentional or subtle, such as the use of nicknames or teasing. It is for the complainant to decide for him or herself what they regard as offensive.

4.3 Harassment on the Grounds of Disability or Age

It is against the Company's policy for any employee to harass another employee on the grounds of his or her disability or age. The principles set out above apply equally to harassment on the grounds of disability or age.

4.4 Harassment using mobile phones or similar

The photographing or filming of fellow employees, customers, visitors or any member of the public without their consent may breach an individual's right to privacy and in certain circumstances if could be judged to have been offensive, may therefore constitute harassment.

5 HARASSENT COMPLAINTS PROCEDURE

Due to the seriousness with which the Company views harassment, informal and formal reporting procedures have been introduced in addition to the Grievance Procedure as a mechanism for dealing with complaints of harassment. All allegations of harassment will be dealt with seriously, promptly and in confidence and employees who feel they have been subject to harassment must not hesitate in using this procedure nor fear victimisation. Retaliation against an employee who brings a complaint of harassment is a disciplinary offence which may constitute gross misconduct. Advice and assistance will be provided to employees subjected to harassment and assist in the resolution of any problems, whether through informal or formal means.

5.1 Reporting and Investigation of Complaints - Informal Procedure

If an incident happens which an employee thinks may be harassment and they do not wish it to happen again, they should initially attempt to resolve the problem informally. In some cases it may be possible and sufficient to explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends the employee or makes them uncomfortable and that it interferes with their work. In circumstances where this is too difficult or embarrassing for the employee to do on their own they should seek support from a work colleague or Manager.



5.1.1 If employees are in any doubt as to whether an incident or series of incidents that have occurred constitute harassment, then in the first instance they should approach their Manager or the Company's Human Resources Advisor on an informal basis. They will be able to advise employees as to whether the complaint merits further action, in which case the matter will be dealt with formally/informally as appropriate.

5.1.2 If the conduct continues or if it is not appropriate to resolve the problem informally, it should be raised through the following formal procedure.

5.2 Reporting and Investigation of Complaints – Formal Procedure

While the Company encourages employees who believe they are being harassed to notify the offender (by words or by conduct) that his or her behaviour is unwelcome, the Company also recognises that actual or perceived power and status disparities may make such confrontation impractical or difficult. In the event that such informal, direct communication between employees is either ineffective or impractical, the following steps should be followed in reporting a complaint of harassment:-

5.2.1 Any employee who believes he or she has been or is being harassed in violation of this policy, or who wishes to report an incident of harassment, should speak to their Manager. If the employee does not wish to speak to their Manager, they can instead speak to one of the following individuals: another Manager, Human Resources Advisor or Director.

5.2.2 Such reports should be made promptly so that investigation may proceed and any action taken expeditiously.

5.2.3 All allegations of harassment will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly complaints of harassment. The allegation will be promptly investigated. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate an allegation, the Company must be able to determine the scope of the investigation and the individuals who should be informed of the allegation.

5.2.4 The complainant will be informed of the outcome of the investigation and the Company's conclusions. The Company is committed to taking appropriate action with respect to all complaints of harassment.

5.3 General Information - Formal Procedure

5.3.1 Complainants will be interviewed by the relevant person handling the complaint in order to establish full details of the allegations and will;

- Carry out a thorough, impartial and objective investigation as quickly as possible.
- Not be connected with the allegation in any way.
- Carry out investigations sensitively and with due respect for the rights of both the complainant and the alleged harasser.
- Interview the person(s) whom the complaint was made against.

5.3.2 The alleged harasser will be given full details of the nature of the complaint and will be given the opportunity to respond. The complainant and the alleged harasser will have the right to be accompanied and/or represented by a friend or colleague at any interviews.

5.3.3 Strict confidentiality will be maintained throughout the investigation into the allegation. Where it is necessary to interview witnesses the importance of confidentiality will be emphasised. When the investigation has been completed the complainant will be informed whether or not the allegation is founded.

5.3.4 If the allegation is founded, disciplinary action may be taken against the person alleged to have committed the behaviour the complainant is complaining about and, depending on the circumstances and the seriousness of the complaint, may result in the dismissal of that person.



6. DISCIPLINARY ACTION

Any employee of the Company who is found to have harassed another employee, regardless of how that harassment manifests, in violation of this policy will be subject to appropriate disciplinary action under the Company's disciplinary procedure. Such behaviour will be treated as gross misconduct and could render the employee liable to summary dismissal.

- 6.1 The Company takes harassment very seriously malicious complaints of harassment can destroy the career of a colleague. Any unwarranted allegation of harassment, made in bad faith, will be deemed potential gross misconduct. We are sure that all employees appreciate that this must be so to protect the integrity of this policy.
- 6.2 In addition, any Manager who had knowledge that such harassment had occurred in their area but who had taken no action to eliminate it will also be subject to disciplinary action under the Company's disciplinary procedure.
- 6.3 Any sub-contractor, client representatives, supplier, third parties etc, who are found to have harassed Oliveti Group employee(s), client representatives, suppliers, third parties etc, regardless of how that harassment manifests, will be held in violation of this policy and the matter will be reported to their respective company. Oliveti Group will review the nature of the alleged harassment in order to determine whether Oliveti Group takes any subsequent action against the sub-contractor, client representatives, supplier, third parties etc.

7 POLICY REVIEW

Olivet Group will regularly review this Policy Statement to determine its effectiveness in order to ensure it remains appropriate to the nature and scale of the organisations risks. The Policy Statement will be amended when changes to legislation or operational procedures require. Amendments will be issued to all Oliveti Group employees, subcontractors and any other individuals working on behalf of Oliveti Group where necessary.

Signed:



G Oliveti, Managing Director

January 2022