



# GROUP DIGNITY AT WORK POLICY

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*Hill & Smith PLC and its operating companies (the “Group”) is committed to creating a working environment in which individual differences are respected, and everyone is treated with dignity.*

## **Basis**

All employees have a right to work in an environment that is free from all forms of bullying, discrimination, victimisation, harassment or abuse from colleagues and others, when carrying out their work.

## **Principles**

This Policy covers all the Group’s employees as well as directors, officers, consultants, contractors, casual workers, agency staff (collectively referred to as employees or the workforce in this Policy) and job applicants.

This Policy applies in every country, operating company, and location within the Group, although it does not form part of any employee’s contract of employment and has been developed to ensure that everyone understands:

- the behaviours that we expect to see to ensure dignity for everyone
- the behaviours that are not acceptable
- the support available to employees who feel bullied, harassed, or discriminated against
- the steps individuals can take if they feel they are not being treated with dignity and respect

At a country or operating company level, there may be a similar policy that also applies, and additional principles or standards to observe.

## **Adoption**

This Policy has been adopted by the Group and will be updated or modified as appropriate.

## **Implementation**

The Executive Board of Hill & Smith PLC has overall responsibility for ensuring that the group’s operating companies comply with this Policy and ensuring that the Group’s operating companies act ethically towards employees and the environment. The senior leaderships teams of each operating company are responsible for ensuring the employees of their business understand and comply with this Policy.

## **Our Commitment**

Employees have a right to work in an environment that is free from all forms of bullying, discrimination, victimisation, and harassment. This standard is reflected in our values which include protecting people, caring for the communities we operate within, promoting the wellbeing of our colleagues, and keeping each other safe.

The Group will not tolerate any breach of this Policy, which means that any related concerns raised will be investigated and where there is a case to answer, the matter will be handled under the disciplinary procedure set out by the individual operating company.

## **Inappropriate behaviours**

All incidents of discrimination, bullying, victimisation and harassment (or other inappropriate/unacceptable behaviours that show a lack of respect for others or lead to people feeling uncomfortable/threatened, directly or indirectly), will be taken seriously.



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## Discrimination

This is less favourable treatment of a person or persons that cannot be justified. It is also the unjust or prejudicial treatment of different categories of people, especially on the grounds of a protected characteristic.

## Harassment

This is unwanted behaviour (whether physical, verbal or non-verbal) related to a protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the individual. Harassment is unacceptable, in whichever of these categories it falls.

Sexual Harassment is specifically unwanted conduct (whether physical, verbal or non-verbal) of a sexual nature that has this effect. Sexual harassment can happen to men, women and people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex or anyone of any gender identity.

Examples include:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

All incidents of harassment will be investigated and taken seriously.

## Bullying

This is offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate, threaten or injure the recipient. This might be a persistent pattern of mistreatment from others in the workplace that causes either physical or emotional harm and it can take the form of verbal, non-verbal, psychological, or physical abuse. A sub-set of this type of unacceptable behaviour is cyber-bullying, which is bullying, harassment or victimisation through social media or electronic communications. This includes the posting of narrative or photographs/video content that could cause offence or make an individual feel threatened.

Legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, will not amount to bullying on their own.

## Victimisation

Victimisation is when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint. Examples include:

- being labelled a troublemaker or being left out
- denying someone an opportunity because it is suspected they intend to make a complaint about harassment
- excluding someone because they have raised a grievance about harassment
- failing to promote someone because they accompanied another staff member to a grievance meeting



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- dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

### Unacceptable behaviours

Unacceptable behaviour is any form of conduct or behaviour of a physical, verbal, or non-verbal nature which is unwanted, unsolicited, unreasonable, and personally offensive to the recipients irrespective of its intentions. This is conduct which creates an intimidating, hostile or humiliating working environment for the recipients.

Examples of behaviour that is likely to be in breach of this Policy include:

- spreading of vicious or unfair rumours
- insulting someone
- copying content that might be viewed as criticism about one person to others who do not need to know (whether or not the person is copied in)
- ridiculing or demeaning someone, including 'picking on them' or setting them fail
- exclusion (from an event or a meeting, or a discussion) for no apparent reason
- unfair treatment, or treatment that appears to differentiate one person from another for no objective reason
- overbearing supervision or misuse of power or position
- insulting someone
- unwelcome sexual advances including touching, standing too close, displaying of offensive materials, asking for sexual favours, making decisions based on sexual advances being accepted or rejected
- making threats or comments about job security without foundation
- deliberately undermining a competent person by overloading and/or constant criticism
- preventing individuals progressing by intentionally blocking promotion or training opportunities for no objective reason

### **Roles and Responsibilities**

Local management teams are responsible for ensuring their team members comply with this Policy and to the required standards.

The HR community members provide guidance on the interpretation and implementation of the policy to managers and employees.

Every employee is expected to comply with this Policy, to ensure that their behaviour does not constitute bullying or harassment, and to make enquiries of their manager or colleagues if they are unsure of their obligations under this Policy.

### **Violation**

Employees are recommended to raise their concerns, regarding inappropriate or unacceptable behaviour (towards themselves or colleagues) directly with the individual whose behaviour is causing concern, if they feel able to. It is sometimes the case that an individual is not aware that their behaviour is unwelcome and upsetting, and most people who are advised that this is the case, would appreciate an informal approach to resolving the issue. If this is not possible, the following options also apply.

A grievance can be raised formally under the individual operating company's grievance procedure where an informal approach has not proved satisfactory or practical. Allegations regarding potential breaches of this



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Policy will be treated in confidence and investigated. Employees who make such allegations in good faith will not be treated less favourably as a result. Where an employee feels unable to report the situation to local management they are encouraged to use the “SPEAK UP” hotline, a confidential mechanism hosted by Navex Global for raising concerns about the workplace. This is a confidential helpline and can be found at:

<https://hsgroup.ethicspoint.com>.

Any situation where an individual, may be in breach of this Policy will be investigated. In some circumstances, a breach of this Policy, may result in a range of disciplinary sanctions including summary dismissal. In some cases, harassment can amount to both an employment and a criminal matter, for example in the case of sexual harassment.

### Associated Documents

- Code of Business Conduct
- Group Whistleblowing Policy

### Other Contacts

- Your Managing Director/local Finance Director
- Group Company Secretary Tel: +44 (0)121 704 7430
- Email: [compliance@hsgroup.com](mailto:compliance@hsgroup.com)

**Approved by the Board of Directors of Hill & Smith PLC**  
**26 September 2024**