



GROUP DIGNITY AT WORK POLICY

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

Our Commitment

All employees, contractors, agency workers, consultants, and third parties engaged by the Group have a right to work in an environment that is free from all forms of bullying, discrimination, victimisation, harassment or abuse when carrying out their work. This standard is reflected in our Group Values.

Principles

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 are not acceptable; the support available to employees who feel bullied, harassed, or discriminated against; and 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, Roles and Responsibilities

The Executive Committee of Hill & Smith PLC has overall responsibility for ensuring that the Group's operating companies comply with this Policy and ensuring they act ethically towards all employees and the environment.

The senior leadership teams of each operating company are responsible for ensuring that all employees of their business understand and comply with this Policy. All employees who observe, receive, or become aware of potential violations of this policy must promptly report such concerns via appropriate channels as detailed within local policies, regardless of whether a formal complaint has been made.

Every employee is expected to comply with this Policy and enquire if they are unsure of their obligations. The HR community can provide guidance on the interpretation and implementation of the policy to managers and employees.

Inappropriate behaviours

All incidents of discrimination, bullying, victimisation and harassment or other inappropriate/unacceptable behaviours that show a lack of respect for others or leads to people feeling uncomfortable/threatened, either directly or indirectly, will be taken seriously. Examples of these, alongside definitions, are set out below:

Discrimination

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

Unwanted behaviour (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 may occur as a single incident or a course of conduct, and can take place in person, online, or through any form of communication.

Sexual Harassment is 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 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 or making sexual comments about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content



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- touching someone against their will, for example hugging them
- sexual assault or rape

All incidents of harassment, in whatever form, will be investigated and taken seriously.

Bullying

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 which 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/Retaliation

Less favourable treatment of a person because they have asserted their legal rights, reported discrimination or supported a harassment claim. The Group strictly prohibits any form of retaliation against any individual who, in good faith, reports a concern, participates in an investigation, or exercises their rights under this Policy. Acts of retaliation will be treated as separate disciplinary matters and may result in disciplinary action up to and including dismissal.

Unacceptable behaviours

Physical, verbal or non-verbal conduct or behaviour, 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.

Violation

Employees are encouraged 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 safe in doing so. It is sometimes the case that an individual is not aware that their behaviour is unwelcome, and most people who are advised that this is the case would appreciate an informal approach. If this is not possible, a grievance can be raised formally under the individual operating company's grievance procedure. Allegations regarding potential breaches of this Policy will be treated in confidence to the extent possible allowing for a thorough investigation and will be investigated impartially. Employees who make such allegations in good faith will not be treated less favourably as a result.

Employees may also use the 'SPEAK UP' hotline, a confidential mechanism hosted by Navex Global for raising concerns about the workplace (<https://hsgroup.ethicspoint.com>).

Any alleged breach of this Policy will be investigated under the Disciplinary Procedure. A breach of this Policy may result in a range of disciplinary sanctions including summary dismissal and may lead to criminal proceedings.

Associated Documents

- Code of Business Conduct
- Whistleblowing Policy

Other Contacts

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