



GROUP DIGNITY AT WORK POLICY

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, victimization, harassment or abuse from colleagues and others, when carrying out their work.

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 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; 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

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, victimization, 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.

Inappropriate behaviours

All incidents of discrimination, bullying, victimization and harassment or other inappropriate or unacceptable behaviours that show a lack of respect for others or leads to people feeling uncomfortable or threatened, either directly or indirectly (e.g. when someone observes threatening behaviour towards others), will be taken seriously.

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.



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Harassment

This is unwanted behaviour 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.

Bullying

This is offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate, 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 victimization 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.

Victimization

This is the singling out of someone for cruel or unjust treatment, whether practical, or psychological.

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; and
- 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.



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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 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.

Employees 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 under the Disciplinary Procedure. 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

- Group Code of Business Conduct
- Whistleblowing Policy
- Anti-Tax Evasion (Corporate Criminal Offences) Policy

Other Contacts

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