

# Bullying and Harassment Procedure

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## 1. Purpose

The purpose of this procedure is to provide a clear and effective process for addressing and resolving issues of bullying and harassment within Statom Group. We are committed to ensuring a safe and respectful workplace where all employees are treated with dignity and respect.

## 2. Scope

This procedure applies to all employees of Statom Group, including full-time, part-time, and fixed-term employees. It also applies to contractors, consultants, and any other individuals working on behalf of the company.

## 3. Definition

1. **Bullying:** Repeated, unreasonable behaviour directed towards an employee or group of employees, which creates a risk to health and safety. Examples include, but are not limited to, belittling remarks, spreading malicious rumours, and undermining someone's work.
2. **Harassment:** Unwanted conduct related to a protected characteristic (such as age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation) which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

## 4. Responsibilities

- **Managers:** Responsible for fostering a positive work environment, addressing complaints of bullying and harassment, and taking appropriate action to resolve issues.
- **Employees:** Responsible for treating colleagues with respect, reporting any incidents of bullying or harassment, and cooperating with investigations.
- **HR Department:** Responsible for supporting employees and managers, ensuring compliance with this procedure, and maintaining records of complaints and outcomes.

## 5. Reporting Procedure

### 1. Informal Resolution

- **Direct Approach:** Employees are encouraged to address the issue directly with the individual involved, if they feel safe and comfortable doing so. This can sometimes resolve the issue without further escalation.
- **Informal Support:** Employees may seek informal support from a trusted colleague, manager, or HR representative to discuss the issue and explore possible solutions.

### 2. Formal Complaint

- **Submission:** If informal resolution is not possible or effective, employees should submit a formal written complaint to their line manager or HR department. The complaint should include details of the behaviour, dates, and any witnesses.
- **Acknowledgment:** The HR department will acknowledge receipt of the complaint in writing and provide the employee with information on the next steps.

## 6. Investigation Process

## 1. Investigation Initiation

- **Appointment of Investigator:** An impartial investigator will be appointed to conduct the investigation. This may be an HR representative or an external investigator if necessary.
- **Investigation Plan:** The investigator will create a plan outlining the investigation process, including timelines and methods for gathering evidence.

## 2. Evidence Gathering

- **Interviews:** The investigator will conduct interviews with the complainant, the alleged perpetrator, and any relevant witnesses.
- **Documentation Review:** The investigator will review any relevant documents, such as emails, performance records, or previous complaints.

## 3. Findings

- **Report:** The investigator will compile a report summarizing the findings of the investigation and any recommendations for action.
- **Decision:** Based on the report, the HR department or a designated decision-maker will determine the appropriate action, which may include disciplinary measures or other remedies.

## 7. Outcome and Follow-Up

### 1. Communication

- **Outcome:** The employee who made the complaint and the alleged perpetrator will be informed of the outcome of the investigation in writing. This will include details of any actions taken.
- **Confidentiality:** All information regarding the investigation will be treated confidentially and only shared with those directly involved.

### 2. Follow-Up

- **Support:** Support will be provided to the complainant and any other affected employees to ensure a resolution and to prevent further issues.
- **Review:** The HR department will review the situation after the investigation to ensure that the issue has been resolved and to address any ongoing concerns.

## 8. Appeals

- **Appeal Process:** Employees who are dissatisfied with the outcome of the investigation can appeal the decision. Appeals must be submitted in writing within 7 days of receiving the outcome.
- **Appeal Review:** The appeal will be reviewed by a different manager or panel, and a final decision will be communicated in writing.

## 9. Prevention and Training

- **Training:** All employees will receive training on bullying and harassment to ensure awareness of acceptable behaviour and the procedures for reporting concerns.
- **Preventive Measures:** The company will implement measures to prevent bullying and harassment and promote a positive workplace culture.

## 10. Records

- **Documentation:** Records of complaints, investigations, and outcomes will be kept confidential and in compliance with data protection regulations.
- **Retention:** Records will be retained for a period of [insert duration] and then securely disposed of.

## 11. Policy Review

This procedure will be reviewed annually to ensure its effectiveness and compliance with current legislation. Updates will be communicated to all employees.

## 12. Contact

For questions or further information regarding this procedure, please contact HR Department.

**Effective Date:** 01/09/2024

**Policy Owner:** Martina Oyite – Head of HR

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