



# Equal Opportunity and Anti-harassment Policy

Version 1.0

July 2021

## Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Monica Whitefield	Lyca Amichia	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	05/2022

## Objective and purpose

Newable values the diversity of our people and the contributions they make. We are committed to providing equal opportunities in employment and avoiding unlawful discrimination against our staff, customers and key stakeholders.

We are dedicated to ensuring workplaces are free from discrimination or harassment on the basis of sex, gender reassignment (i.e. transgender status), race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age or any other status protected by applicable law.

Regardless of an individual's personal characteristic or status, Newable does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in our workplaces and in any work-related circumstance outside of Newable. These principles apply to all of our staff as well as our business partners and stakeholders we work closely with.

## Definitions

**Harassment** is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment (i.e. transgender status), race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

**Bullying** is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. For example, picking on someone or setting them up to fail or making threats or comments about someone's job security without good reason.

## Harassment

Examples of harassment include:

- physical conduct ranging from unwelcome touching or sexual advances to serious assault;
- demeaning comments about a person's appearance;
- unwelcome jokes or comments of a sexual or racial nature or about a person's age;
- treating a person differently because they are associated or connected with someone with a protected characteristic, e.g. their child is gay, their spouse is black or their parent is disabled;
- repeated name calling related to a person's religion or belief;
- ignoring a person because they are perceived to have a protected characteristic (whether or not they do, in fact, have that protected characteristic), e.g. an employee is thought to be Jewish, or is perceived to be transgender;
- the use of obscene gestures; and
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person or relating to their actual or perceived protected characteristic, e.g. magazines or calendars.

Conduct may be harassment whether or not the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. Behaviour that any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that it is unacceptable, e.g. sexual touching. It may not be so clear that some other forms of behaviour would be unwelcome to, or could offend, another person, e.g. certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct that unintentionally causes offence will not be harassment but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

Sexual conduct that is consensual, mutual and invited is not harassment. However, the conduct may become unwanted (for example, where a sexual relationship ends) and, if it continues, amount to harassment.

A single incident can be harassment if it is sufficiently serious.

## Bullying

Examples of bullying include:

- intimidating behaviour involving abuse of power or coercion, for instance, overbearing supervision;
- persistent direct or indirect public and/or private criticism or ridicule;
- consistently attacking a member of staff in terms of their professional or personal standing, either directly or indirectly; and
- setting out to make a person's life miserable in the hope of getting him or her dismissed or simply of making him or her resign.

## What to do if you believe you have been bullied or harassed

We encourage anyone who believes that they have been harassed or victimised to come forward and share their experiences and concerns with us. To facilitate this, we have robust procedures designed to assist our people to have open conversations, engage in dispute resolution and, where appropriate, implement a disciplinary process.

If you think you are being bullied or harassed, you may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. You may feel able to approach the person yourself, or with the help of someone else. You should tell the person what behaviour you find offensive and unwelcome, and say that you need them to stop it immediately.

If an informal approach does not resolve matters, or you think the situation is too serious to be dealt with informally, you can make a formal complaint by using our grievance procedure.

If you raise a grievance, the normal grievance procedure is modified so that you can choose whether to raise your grievance with your manager or with another manager.

## How we respond to complaints

We will promptly investigate all complaints and, if appropriate, bring disciplinary proceedings against the alleged harasser. You have the right to be accompanied by a companion or trade union representative of your choice at any meeting dealing with your grievance. We will keep in touch with you on the general progress of the process of investigation and, subject to data protection requirements, the outcome of any disciplinary proceedings.

We treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible.

You have a right not to be victimised (essentially treated badly) for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that you know to be untrue may lead to disciplinary action being taken against you.

## Your responsibilities

You need to play your part in helping us create a work environment that is free from harassment and bullying, and where everyone can achieve their potential.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under our disciplinary procedure. We treat this type of conduct extremely seriously and it may lead to dismissal without notice.