

Introduction

The purpose of this policy is to protect our people from bullying and harassment and to enable employees, if necessary, to make a complaint or assist in an investigation without fear of reprisal.

Harassment and bullying at work in any form is unacceptable behaviour. Everyone must comply with the policy and should ensure that their behaviour to colleagues and customers does not cause offence or constitute harassment or bullying.

Scope

This policy applies to all ABCA Systems Ltd. employees, regardless of position or status, and to contractors and subcontractors.

This policy prohibits all forms of discrimination, harassment and bullying whether amounting to unlawful conduct or not and includes harassment, bullying or discrimination on grounds of sex, sexual orientation, marital or civil status, pregnancy or maternity, gender identity and expression, gender reassignment, race, religion, belief, colour, nationality, ethnic or national origin, disability or age.

What is harassment

Harassment is unwanted or offensive behaviour related to one of the following protected characteristics:

- Sex
- Sexual orientation
- Marriage and civil partnership status
- Pregnancy and maternity
- Age
- Gender reassignment
- Race
- Disability
- Religion or belief

This can include unwelcome physical, verbal and/or non-verbal behaviour, or, where the behaviour creates an intimidating, hostile or offensive working environment. A single incident may amount to harassment if sufficiently serious.

Harassment is most often targeting a protected characteristic of the victim. A person may also be harassed because of their relationship with someone else or because of others perception of them. Harassment by third parties can occur where our employees are harassed by a third party of the Company such as a supplier or customer.

What is bullying

Bullying is offensive, intimidating, malicious or insulting behaviour which, through the abuse or misuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened.

Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. As with harassment, bullying can take the form of physical, verbal and non-verbal behaviour.

Types of bullying can include:

- Derogatory remarks
- Insensitive jokes or pranks
- Insulting or aggressive behaviour
- Shouting and swearing
- Ignoring or excluding an individual
- Setting unrealistic deadlines and making excessive and unreasonable demands
- Destructive, unfair or public criticism
- Withholding necessary information

Complaints

If an employee feels harassed or bullied they must decide whether they would prefer this to be addressed using an informal approach and/or whether to proceed with a formal complaint under the Grievance Policy & Procedure. Complaints will be taken seriously and dealt with in confidence

Any line manager who receives a complaint of harassment or bullying, or is witness to it, must follow the Grievance Policy & Procedure and a suitable manager will be given the responsibility of carrying out an investigation into the complaint or incident as quickly as possible. All managers have a responsibility to establish and maintain a working environment free from harassment and bullying and to ensure that any of our people who make a complaint of harassment or bullying are not victimised.

All employees must comply with this policy and take steps to ensure that harassment and bullying does not occur. Any employees who receive a complaint of harassment or bullying must respect confidentiality and should encourage the individual to consider reporting this.

Any complaints found to be false and malicious may result in disciplinary action being taken against the complainant.

Where the Company is made aware that harassment by third parties has taken place the Company will take reasonable steps to prevent such harassment happening again.