



IDG Group DMCC

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ANTI-HARASSMENT AND BULLYING POLICY

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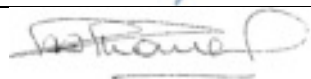
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ANTI-HARASSMENT AND BULLYING POLICY

1. About This Policy

IDG is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs both at work and out of the workplace. It covers bullying and harassment by staff (which may include consultants, contractors, and agency workers) and by third parties such as customers, suppliers, or visitors to our premises.

Harassment is a disciplinary offence and will normally be treated as gross misconduct.

2. What Is Harassment?

Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment includes unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless). A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

It may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- a) unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing
- b) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- c) offensive e-mails, text messages or social media content
- d) mocking, mimicking, or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

Please see also IDG's *Preventing Sexual Exploitation and Abuse Policy*.



3. What Is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined, or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include, by way of example:

- a) physical or psychological threats
- b) overbearing and intimidating levels of supervision
- c) inappropriate derogatory remarks about someone's performance.

Legitimate, reasonable, and constructive feedback regarding a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

4. If You Are Being Harassed or Bullied

If you feel able to raise the problem informally with the person responsible, you should explain clearly to them that their behaviour is not welcome or makes you uncomfortable.

If this is not possible, you should speak to your supervisor/line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under the Grievance Procedure. Anyone who believes that he or she may have been the victim of harassment should raise the matter through the Company's Grievance Procedure to: grievances@idg-security.com. This will be reviewed by the HR Director who will consult with you on the appropriate next steps.

You may complain of behaviour that you find offensive even if it is not directed at you personally.

5. Investigation and action

Complaints or concerns will be investigated in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint.

Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis.



Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct.

Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

Where harassment arises from people not directly employed by the Company e.g. customers or clients, such complaints will be taken seriously and will be pursued with the third party concerned, exercising whatever sanctions are available.

6. Protection and Support for Those Involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our disciplinary procedure.

IDG encourages a neutral and objective representative to act as a point of contact for all staff seeking to report an incident or seeking advice. This may be the HR Director or a local representative. They will hear and deal with any complaint, and will keep any incident confidential at all times, as per Section 5 of this policy. Should an employee wish to make a formal complaint they will be supported by HR/the representative in doing so, if this is requested. At this point the representative will remain available to assist in the management of all subsequent activities and support the staff member making the complaint. IDG's line management will deal with incident.

7. Record-Keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

