

SEXUAL HARASSMENT POLICY

1. Policy Statement

Riello UPS has a **zero-tolerance approach to sexual harassment** and is committed to providing a safe, respectful and inclusive working environment where everyone is treated with dignity and respect.

Sexual harassment is unlawful and will not be tolerated under any circumstances. The Company recognises that sexual harassment can have a serious impact on individuals' wellbeing, dignity, confidence and performance. Riello UPS is committed not only to responding appropriately to incidents of sexual harassment, but to taking **proactive and reasonable steps to prevent sexual harassment from occurring**, including harassment by third parties.

This policy supports and reflects the Company's core values:

- **Energy and Engagement** – creating an environment where everyone feels safe, respected and able to contribute
- **Think Customer** – acting professionally and respectfully in all interactions
- **Winning Team** – fostering trust, respect and integrity in working relationships
- **Drive for Results** – maintaining high standards of conduct and accountability

This policy should be read in conjunction with the Company's:

- **Dignity, Respect, Anti-Harassment & Bullying Policy**
- **Equal Opportunities, Diversity & Inclusion Policy**
- **Code of Conduct & Behaviour Policy**
- **Grievance Policy & Procedure**
- **Disciplinary Policy & Procedure**

This policy does not form part of the employee's contract of employment.

2. Legal Framework

United Kingdom

This policy reflects the Company's obligations under:

- Equality Act 2010
- Worker Protection (Amendment of Equality Act) Act 2023
- Employment Rights Act 1996
- ACAS Codes of Practice
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Under UK law, the Company has a **positive duty to take reasonable steps to prevent sexual harassment**.

Ireland

This policy reflects obligations under:

- Employment Equality Acts 1998–2015
- Industrial Relations Acts
- Workplace Relations Commission (WRC) Codes of Practice
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The Company will comply with all applicable legislation in both jurisdictions.

3. Scope of the Policy

This policy applies to:

- all employees, workers and job applicants;
- managers, senior leaders and directors;
- contractors, agency staff and consultants;
- customers, suppliers, visitors and other third parties.

Sexual harassment may occur:

- in the workplace;
- during work-related travel;
- at work-related social events or training;
- online or via digital communication platforms;
- outside the workplace where there is a work-related connection.

4. What Is Sexual Harassment?

Sexual harassment is defined as:

Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment can occur regardless of:

- gender, gender identity or sexual orientation;
- seniority or position;
- whether the behaviour was intended to cause offence.

A single incident may constitute sexual harassment.

The key consideration is **how the behaviour is experienced**, not the intention behind it.

5. Examples of Sexual Harassment

Sexual harassment may include, but is not limited to:

- unwelcome sexual advances or propositions;
- requests or pressure for sexual favours;
- suggestive comments, jokes, remarks or gestures;
- intrusive questions about a person's body, appearance or private life;
- displaying, sharing or circulating sexually explicit or suggestive material;
- unwanted physical contact, touching or brushing against someone;
- staring, leering or sexualised body language;
- sending inappropriate messages, images or videos (including emojis);
- sexualised behaviour online, via messaging apps or social media.

This list is not exhaustive.

6. Third-Party Sexual Harassment

Sexual harassment by **customers, suppliers, contractors or other third parties** will not be tolerated.

The Company will take reasonable steps to:

- prevent third-party sexual harassment;
- respond promptly where incidents occur;
- support employees affected by third-party behaviour.

Action may include:

- addressing the behaviour directly with the third party;
- restricting access to Company premises;
- terminating business relationships where appropriate.

7. Responsibilities

Employees

All employees are responsible for:

- behaving in a respectful and professional manner;
- not engaging in sexual harassment;
- challenging inappropriate behaviour where appropriate and safe;
- reporting concerns promptly.

Managers

Managers are responsible for:

- leading by example and modelling appropriate behaviour;
- fostering a safe and respectful working environment;
- being alert to behaviours that may constitute sexual harassment;
- taking all concerns seriously, even where no formal complaint is made;
- escalating matters promptly to **People & Culture (HR)**;
- supporting employees affected by sexual harassment.

Managers must not attempt to resolve allegations of sexual harassment without involving **People & Culture**.

The Company

The Company will:

- take reasonable and proactive steps to prevent sexual harassment;
- provide training and guidance to employees and managers;
- assess and manage risks of sexual harassment, including in high-risk environments;
- investigate complaints fairly, promptly and impartially;
- protect individuals from victimisation;
- take appropriate disciplinary action where breaches occur.

8. Prevention and Reasonable Steps

To meet its preventative obligations, the Company will take reasonable steps which may include:

- maintaining clear, accessible policies;
- providing regular training and awareness;
- ensuring clear reporting routes;

- monitoring workplace culture and behaviours;
- addressing risk factors such as lone working, customer-facing roles or social events;
- reviewing incidents and learning from outcomes.

9. Reporting Sexual Harassment

Employees may report sexual harassment at any time.

Concerns can be raised with:

- the employee's line manager;
- **People & Culture** ;
- a senior manager.
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Employees are **not required to confront** the person responsible.

Reports may be made verbally or in writing and will be treated seriously and sensitively.

10. Informal and Formal Resolution

Where appropriate and agreed, concerns may be addressed informally, for example by:

- facilitated conversations;
- mediation.

However, informal resolution is **not appropriate for all cases**, and employees are not required to pursue this route.

Formal complaints will be handled under the **Grievance Policy & Procedure**.

11. Investigation and Disciplinary Action

All formal complaints will be investigated in line with the Company's procedures.

Investigations will be:

- fair, impartial and timely;
- conducted by appropriately trained individuals;
- handled confidentially as far as reasonably possible.

Where sexual harassment is substantiated, disciplinary action may include **summary dismissal**.

12. Confidentiality and Protection from Victimisation

The Company will respect confidentiality as far as reasonably possible.

No employee will suffer detriment, retaliation or victimisation for:

- raising a concern in good faith; or
- participating in an investigation.

Victimisation will itself be treated as a serious disciplinary matter.

13. Support and Wellbeing

The Company recognises that sexual harassment can be distressing.

Employees are encouraged to:

- seek support from their manager or **People & Culture (HR)**;
- access wellbeing or employee assistance support where available;
- request reasonable adjustments to support their wellbeing.

14. Reporting to the Police

Where behaviour may constitute a criminal offence or present an immediate risk to safety, employees should contact the Police and inform the Company so appropriate support can be provided.

15. Data Protection

All personal data relating to sexual harassment concerns will be processed in accordance with the Company's: **Data Protection Policy and Privacy Notice**

16. Policy review

This Policy is authorised by the Managing Director and will be reviewed regularly to ensure it remains suitable, effective, and aligned with business objectives, customer expectations, and regulatory requirements.