

## DIGNITY, RESPECT, ANTI-HARASSMENT & BULLYING POLICY

### 1. Policy Statement

Riello UPS is committed to equality, diversity and inclusion and to creating and maintaining a workplace where all employees are treated with **dignity, respect and fairness**.

The Company is committed to providing an environment in which everyone is treated respectfully and without discrimination, harassment or bullying, and where inappropriate behaviour is not tolerated.

This policy supports the Company's four core values:

- **Energy and Engagement**
- **Think Customer**
- **Winning Team**
- **Drive for Results**

In particular, **Winning Team** and **Energy and Engagement** underpin our commitment to respectful, inclusive and collaborative working relationships.

Riello UPS regards any incident of bullying, harassment or discrimination as a serious matter and will respond promptly and sensitively to concerns, taking appropriate action where required.

Sexual harassment is recognised as a specific and serious form of unlawful harassment and is addressed in detail in the Company's **Sexual Harassment Policy**, which sets out additional protections, reporting routes and preventative measures. Nothing in this policy reduces the seriousness with which sexual harassment is treated.

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

- **Code of Conduct & Behaviour Policy**
- **Equal Opportunities, Diversity & Inclusion Policy**
- **Sexual Harassment Policy**
- **Grievance Policy & Procedure**
- **Disciplinary Policy & Procedure**

Together, these policies set out the standards of behaviour expected and the procedures for raising and resolving concerns.

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

### 2. Scope and Purpose

This policy applies to:

- all employees of Riello UPS UK Limited and Riello UPS Ireland Limited;
- managers and colleagues at all levels;
- contractors, agency workers and consultants;
- customers, suppliers and other third parties with whom employees come into contact.

The purpose of this policy is to:

- promote a working environment based on dignity and mutual respect;
- prevent bullying, harassment and discriminatory behaviour;
- encourage early and informal resolution where appropriate;
- provide clear and accessible routes for raising concerns;
- ensure fair, consistent and sensitive handling of complaints;
- support compliance with UK and Ireland equality legislation.

### 3. Responsibilities

#### Employees

All employees are responsible for:

- treating others with dignity, respect and professionalism;
- behaving in a manner consistent with Company values;
- challenging unacceptable behaviour where appropriate;
- raising concerns promptly;
- modifying their behaviour if it is found to be unacceptable.

#### Managers

Managers are responsible for:

- leading by example;
- fostering a culture of dignity, respect and inclusion;
- being alert to inappropriate behaviour;
- taking timely and appropriate action when concerns are raised or observed;
- ensuring matters are handled sensitively, fairly and confidentially;
- seeking advice from **People & Culture (HR)** where required.

#### The Company

The Company will:

- treat all complaints seriously and confidentially;
- ensure complaints are investigated fairly and impartially;
- take reasonable steps to prevent harassment and bullying, including by third parties;
- protect employees from victimisation;
- take appropriate action where breaches occur.

### 4. What is Harassment?

Harassment is defined as:

**Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.**

Protected characteristics include (but are not limited to):

- age
- disability
- gender reassignment

- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Harassment can be:

- verbal;
- non-verbal;
- physical;
- written (including emails, messaging and social media).

Harassment may occur even if:

- the behaviour was not intended to cause offence;
- the behaviour occurs only once;
- the person engaging in the behaviour did not realise its impact.

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

## 5. What is Bullying?

Bullying is defined as:

**Repeated inappropriate behaviour, whether direct or indirect, that undermines, humiliates, intimidates or harms another person.**

Bullying does **not** need to be linked to a protected characteristic.

Examples of bullying may include (but are not limited to):

- persistent unjustified criticism;
- shouting, aggressive or intimidating behaviour;
- undermining someone's work or professional reputation;
- spreading malicious rumours or gossip;
- deliberate exclusion or isolation;
- setting unrealistic or unmanageable workloads or deadlines;
- misuse of power or position.

Bullying is often characterised by:

- a pattern of behaviour;
- an imbalance of power;
- a negative impact on wellbeing or performance.

## 6. Examples of Unacceptable Behaviour

Unacceptable behaviour may include, but is not limited to:

- unwelcome physical contact;
- offensive jokes, comments or language;

- threatening, abusive or intimidating behaviour;
- ridicule or humiliation;
- display or sharing of offensive or inappropriate material;
- deliberate isolation or exclusion;
- persistent unfair criticism or micromanagement;
- cyberbullying or inappropriate online behaviour.

This applies whether behaviour occurs:

- face-to-face;
- by email or messaging platforms;
- on social media;
- during work-related events or social functions.

## 7. What is Not Bullying or Harassment?

Legitimate and reasonable management actions do not constitute bullying or harassment, including:

- providing constructive feedback;
- setting reasonable performance standards;
- managing performance, conduct or attendance;
- applying Company policies and procedures;
- addressing misconduct or poor behaviour.

These actions must always be carried out:

- fairly;
- consistently;
- respectfully.

## 8. Resolution and Raising Concerns

Employees are encouraged, where appropriate, to seek **early and informal resolution**, which may include:

- speaking directly to the individual concerned (if comfortable);
- seeking advice or support from a manager or **People & Culture**.

### Formal Complaints

Where informal resolution is not appropriate or has been unsuccessful, a formal complaint may be raised with:

- the employee's line manager;
- **People & Culture (HR)**;
- a senior manager.

Formal complaints will be handled in accordance with the Company's **Grievance Policy & Procedure**.

Any misconduct identified may result in action under the **Disciplinary Policy & Procedure**.

## 9. Confidentiality and Protection from Victimisation

The Company will respect confidentiality as far as reasonably possible.

No employee will suffer any detriment, victimisation or retaliation for:

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

Any victimisation will itself be treated as a disciplinary matter.

## **10. Third-Party Behaviour**

This policy applies to bullying or harassment by **customers, suppliers or other third parties**.

The Company will take reasonable steps to prevent and address such behaviour and will support employees affected by third-party misconduct.

## **11. Reporting to the Police**

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

## **12. Data Protection**

All personal data relating to complaints or investigations will be processed in accordance with the Company's: **Data Protection Policy and Privacy Notice**

## **13. 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.