# Sexual Harassment Policy



Amendments or additions to this policy will be issued by the People Department only.

Unauthorised alteration to this policy may result in disciplinary action.

The latest version of this policy is available on GiNET for internal use, and on the Gi Group website for external use.

For the purpose of this policy the Company refers to Gi Group Holding which includes:

- Gi Group
- Grafton
- Marks Sattin
- INTOO
- TackTMI

For employees, this policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

# Sexual Harassment Policy

## Policy statement (Zero Tolerance)

Gi Group is committed to ensuring that all staff and applicants are treated with dignity and respect and treat others in the same way. We believe that all staff and applicants have the right to work in an environment which is free from any form of harassment, including sexual harassment.

Gi Group has a zero-tolerance approach to sexual harassment.

Gi Group is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees, workers, and applicants. This policy will be reviewed and updated annually to ensure Gi Group's compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025, to ensure that all reasonable steps are taken to prevent sexual harassment.

## Scope (who this policy applies to)

This policy applies to:

- Permanent employees;
- Temporary agency workers supplied by Gi Group;
- Other workers engaged by the Company (including contractors, consultants, temporary workers, self-employed individuals, volunteers, interns and/or apprentices) and job applicants.
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Where individuals are not permanent employees, the spirit of this policy will be followed, but there may be variation to allow for more appropriate processes to be followed (for example, processes set out in the Agency Worker Handbook, hirer site procedures, or other applicable arrangements).

Employees based outside of the UK will be provided with the relevant local procedures.

This policy applies to all stages of the employment relationship and recruitment, and to harassment by third parties so far as these issues are within our control.

## Where this policy applies (workplace and work-related activity)

This policy applies to all interactions within our workplace, work-related events, assignments, client/hirer sites, and any communication related to work (including phone, email, messaging and social media), irrespective of whether it happens during or outside of normal working hours.

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## Definitions

### Harassment

Under the Equality Act 2010, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, including conduct of a sexual nature.

### Sexual Harassment

In accordance with the Equality Act 2010, Gi Group is committed to providing a work environment free from unlawful sexual harassment.

Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:

- violating the victim's dignity; or
- creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

An individual of any gender may be the victim of sexual harassment.

### Examples of sexual harassment (non-exhaustive)

Sexual harassment can include (but is not limited to):

- Slurs or unwanted sexual advances;
- Unwelcome sexual advances including flirting or gestures;
- Requests for sexual favours;
- Threats or demands to submit to sexual requests as a condition of continued employment/assignment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
- Sexual comments or jokes;
- Unwanted comments of a sexual nature including "compliments" about someone's appearance;
- Questions about an individual's sex life and discussing your own sex life;
- Visual conduct such as derogatory or sexually oriented posters or the display of sexually explicit materials;
- Sharing sexual content including "sexting", sending sexual images, or other inappropriate sexual content via work systems or personal devices where connected to work;
- Physical conduct such as assault, unwanted touching, hugging, massaging, or kissing, or any interference because of sex, race, or any other protected characteristic;
- Sexual assault, stalking/predatory behaviour, grooming;

- Invading someone's personal space without physical touching (e.g., standing too close, leaning over them).

## Responsibilities and expected standards of behaviour

All employees, workers and third parties engaged with in the course of work are expected to comply with this policy.

We expect everyone to follow this policy and to let us know immediately if they become aware of anyone not following it. We will not tolerate sexual harassment of any kind—irrespective of whether it is directed at an employee, worker, agency worker, job applicant, customer, client, supplier, hirer contact, or any other third party.

Any breach of this policy will lead to appropriate action. For employees, this may include disciplinary action up to and including dismissal. For temporary agency workers, this may include action under Gi Group's complaints process (including where the conduct involves individuals not engaged by Gi Group) and may also include removal from assignment. For third parties, sanctions may include removal from site, termination of commercial arrangements, or other action as appropriate.

## Reporting concerns (including third-party harassment)

### If you experience or witness sexual harassment:

If an individual believes that they have been sexually harassed by a colleague or a third party not employed by Gi Group that they have come into contact with in the course of their work, they should make an immediate report to their line manager followed by a written complaint as soon as possible after the incident.

If the individual does not feel comfortable reporting to their line manager, they should contact: UK Employee Relations: ukemployeerelations@gigroup.com

### What information to include:

The details of the complaint should include:

- Details of the incident (including dates and locations);
- Name(s) of the individual(s) involved;
- Name(s) of any witness(es).

## Support and confidentiality

We recognise every experience is unique and the support each person may need will be different. Please tell us what support would be helpful. We will handle concerns sensitively. We will keep information shared confidential (except where you agree we can share it with specific individuals), unless we are concerned about your safety or someone else's safety, or we are required to disclose it by law or to relevant authorities.

## Police reporting / external reporting

You may want to report sexual harassment to the police. Where that is the case, we will support you to do so. We may need to pause or adapt our internal investigation to avoid interfering with any police investigation or action.

There may be times when an individual chooses not to report the matter to the police or other authorities/regulators, but the Company considers the matter too serious not to report; in those circumstances, the Company may report the matter to the appropriate body or authority.

## Grievance process (where applicable)

If you do not feel comfortable approaching the person yourself, or a direct approach has not worked, you should refer to the Grievance Policy (where applicable), which sets out a clear process for raising complaints both informally and formally.

For temporary agency workers, relevant routes may also include the Agency Worker Handbook processes.

## Special provisions for temporary agency workers / work-seekers and hirer sites

Where an incident/complaint of sexual harassment relates to a temporary agency worker or a work-seeker:

- Gi Group will not carry out instructions from a hirer and/or intermediary and/or third party which it considers will amount to sexual harassment or victimisation.
- Gi Group will take all reasonable steps to safeguard job applicants, work-seekers, temporary agency workers it supplies, and internal members of staff from harassment.
- Gi Group will obtain confirmation from hirers that they have a sexual harassment policy in place.
- Where relevant, Gi Group will liaise with the hirer to ensure appropriate action is taken and that the temporary agency worker is supported.
- Gi Group will take all reasonable steps to ensure that third parties that staff come into contact with in the course of work are aware of Gi Group's policies on sexual harassment.
- Gi Group will encourage hirers/intermediaries to maintain appropriate equality and anti-harassment arrangements and will consider additional checks where concerns or risk indicators are identified.

## Investigation, complaints, monitoring and outcomes

Gi Group will undertake a thorough investigation of allegations. If it is concluded that harassment has occurred, remedial action will be taken.

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Gi Group has procedures for monitoring compliance with this policy and for dealing with complaints of sexual harassment. These are available in the Agency Worker Handbook and will be made available immediately upon request. Any discrimination complaint will be investigated fully.

## Disciplinary action and consequences (where applicable)

- Employees who Gi Group finds to be responsible for sexual harassment will be subject to disciplinary procedures. Sexual harassment may constitute gross misconduct and may result in dismissal without notice.

- Temporary agency workers who Gi Group finds to be responsible for sexual harassment will be subject to Gi Group's complaints procedure (and/or other relevant action), including where such sexual harassment involves individuals who are not engaged by Gi Group.

## Protection from victimisation / retaliation

If you raise concerns of sexual harassment behaviour in good faith, or participate in an investigation into such concerns, you will not be treated differently as a result of doing so. Victimisation is not tolerated and may result in disciplinary action and/or other sanctions.

## Training and prevention

Gi Group is committed to preventing sexual harassment through education and training programs. All colleagues will receive training on the prevention of sexual harassment, which will be provided annually. Gi Group will ensure that all operational personnel are given training on sexual harassment, and that this is monitored and refreshed on an annual basis.