Prevention of Sexual Harassment

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Safety | Honesty | Agility | Respect | People
Living our values

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Amendment Record

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Associated Documents

Document Name	Document Number
Sexual Harassment Risk Assessment	SPL-HRS-RAS-0001

References

Reference Name / Link if applicable

Glossary of Terms and Definitions

Abbreviation or Term	Definition

1 Policy Statement

The Company wishes to provide a safe and supportive working environment for everyone that works for us. Such an environment cannot exist where any member of staff is subjected to harassment, intimidation, aggression, victimisation or coercion.

We recognise that sexual harassment is unlawful under the Equality Act 2010. It is unacceptable and will not be tolerated.

The law requires employers to take reasonable steps to prevent sexual harassment of their employees. The Company will be responsible for ensuring everyone understands the rules and policies relating to the prevention of harassing behaviour at work and during work-related social events.

The Company recognises that sexual harassment can exist in the workplace, and this can seriously affect employees' working lives by interfering with their job performance or by creating a stressful, intimidating and unpleasant working environment. Our managers operate an open-door policy and our employees should feel empowered to raise any complaints or concerns if they see or experience inappropriate behaviour.

The Company will treat all complaints of sexual harassment seriously and will investigate them promptly and in confidence. We recognise that we have a duty to implement this policy and all employees are expected to comply with it.

The Company undertakes to review this policy at regular intervals in order to monitor its effectiveness.
Instances of sexual harassment or victimisation may lead to disciplinary action up to, and including, termination of employment.

SPL Powerlines UK Ltd ensures full compliance with UK legislation at all times.

In relation to updates from 30th October 2026 to the Employment Rights Act 2025 and specifically the Worker Protection (Amendment of Equality Act 2010) Act 2023, the company will continue to take all reasonable steps to prevent sexual harassment in line with guidance from ACAS and the Equality and Human Rights legislation, in force from time to time.

The Company maintains a zero-tolerance policy toward sexual harassment; it is completely unacceptable and will not be tolerated. Following updates in the Employment Rights Act 2025, the Company is actively reinforcing this message across all levels of the organisation; in order to

continue to ensure a safe and supportive environment. The following statements sets out the framework updates:

Policy Updates: The Company is reviewing and strengthening all current policies and risk assessments in line with updated guidance. These updated procedures will re-enforce the transparent ways for reporting any incidents or concerns.

Comprehensive Training: All employees and managers will continue to complete yearly external independent online accredited training. This training gives people the awareness to recognise and understand sexual harassment, while specifically giving managers the tools to support their teams.

External Communication: The Company will share these standards to external clients, suppliers, and third-party partners as part of our contractual business engagements and conduct standards expectations.

2 Scope

The document is applicable to all permanent PAYE employees of SPL Powerlines UK and Power and Infrastructure Resourcing Ltd.

3 Definitions of Sexual Harassment and Victimisation

Sexual harassment is unwanted conduct of a sexual nature, which has the purpose, or effect of, violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person and others who witness inappropriate conduct.
Sexual harassment also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.
Sexual harassment may be persistent or an isolated incident, obvious or subtle, face-to-face or indirect.
Examples of behaviour which may constitute sexual harassment include (but are not limited to):

- Unwelcome sexual advances or physical contact;
- Sexual comments, intrusive questions or offensive/embarrassing jokes;
- Physical assault;
- Abusing a position of power e.g. By making promises in exchange for sexual favours;
- Blocking promotion or access to development opportunities;
- Cyber-bullying e.g. Sending offensive and/or sexually explicit emails, texts or visual images, or posting embarrassing images on social media;
- Displaying sexually graphic pictures or photos;
- Suggestive looks, staring or leering; or
- Spreading sexual rumours about an individual.

Victimisation is subjecting an individual to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are:

- Making a claim or complaint under the Equality Act;
  - Helping another individual to make a claim by giving evidence or information in connection with proceedings under the Equality Act; and
  - Making an allegation that someone has breached the Equality Act.

Examples of victimisation may include:

- not considering an individual for promotion because they have previously made a complaint of sexual harassment;
- dismissing an individual because they accompanied a colleague to a meeting about a sexual harassment complaint; or
- excluding an individual from meetings because they gave evidence as a witness for another employee as part of a sexual harassment employment tribunal claim.

4 Unlawful Grounds of Sexual Harassment

The Company reiterates that it will not tolerate any instance of sexual harassment, regardless of the grounds.
This Policy will equally apply to work related events, even if they occur away from the normal workplace.
Harassment may be committed by a fellow employee, or a third party and it does not need to occur in person, e.g. it can occur digitally (WhatsApp, social media sites etc).

5 Reporting Harassment

Employees have the right to complain if they are treated in a way that they believe constitutes sexual harassment or victimisation. The informal and formal procedures to follow are set out below.
Employees who make a genuine complaint under this policy will not be subjected to any unfavourable treatment or victimisation as a result of making the complaint.

6 Witnessing Harassment or Victimisation

If an employee sees sexual harassment or victimisation taking place, they are encouraged to take appropriate action to address it.
If the employee is unable to intervene to prevent the action, they should encourage the employee who is being harassed or victimised to report the incident or report the incident themselves.
Reports of incidents should be made in writing to your Line Manager or a Director or one of the HR team in confidence.

7 Third party harassment

The Company operates a zero-tolerance policy in relation to any forms of harassment of its employees by a third party, such as a client, customer, supplier or visitor.
The law requires employers to take steps to prevent sexual harassment by third parties and the Company is committed to doing so.
All employees are encouraged to report any instances of harassment involving a third party in line with the reporting procedure set out below.
In order to prevent third-party sexual harassment from occurring, the Company will inform third parties of the prevention of harassment policy and any other associated policies. Compliance with the Company policies is mandatory.
If an allegation of harassment by a third party proves to be well-founded, steps taken by the Company may include:

- Warning the individual about the inappropriate nature of their behaviour;
- Banning the individual from the company's premises; and
- Reporting the individual's actions to the police.

8 Procedure for Complaints

The Company is committed to ensuring that there is no sexual harassment or victimisation in the workplace.

Any employee who feels that they have been subjected to sexual harassment or victimisation **MUST** raise the matter as soon as reasonably practicable.

Employees can raise a complaint informally and/or formally. They should contact a Line Manager or another manager in the absence of that manager or where their complaint is against that specific manager. They can also speak to a Director or a member of the HR department.

Before raising a formal complaint, the employee has the option of talking directly and informally to the person whom they believe is harassing them, using the informal procedure below.

It may be that the person whose behaviour is causing offence is genuinely unaware that their behaviour is unwelcome or causing distress and that a direct approach can resolve the matter without the need to use the formal procedure.

9 Informal Procedure

If the employee feels able to do so, they should speak up at the time when they feel harassed. It is important to be direct and for the employee to state explicitly that they feel they are being harassed and that the behaviour is unacceptable to them. At the same time of engaging in an informal process, employee can also discuss the matter with another colleague or their Line

Manager, or a member of the HR department and alternatively, may request them to speak to the harasser on their behalf.

If the employee feels unable to speak to the harasser directly, they could write a letter to them which clearly identifies the offending behaviour and requests that it stops immediately. The employee should sign and date any such letter and ensure that a copy is kept for any possible future formal complaint. It is also advisable that the employee keep an 'incident diary' of any offending behaviour.

Where the informal procedure has not resolved an employee's complaint, a formal grievance can be raised by the employee.

10 Formal Procedure

Any employee who feels that they have been subjected to any form of harassment or sexual harassment may at any time, decide to deal with the issue through formal procedures (using the Company's grievance procedure), regardless of whether informal steps have been taken or not.

When bringing a complaint, the employee should state:

- The name of the person whose behaviour is believed to amount to harassment/sexual harassment; bullet points
- The behaviour that is causing offence, with specific examples;
- Dates and times when incidents of sexual harassment occurred;
- The names of any employees who witnessed any incidents;
- Details of any action the employee has taken to try and address the harassment.
- The Company will investigate any complaint thoroughly and fairly.

An employee accused of harassment/sexual harassment will be informed of the exact nature of the complaint against them and given a full opportunity to give their version of the allegations during the investigation process.

During the investigation, the Company reserves the right to suspend or temporarily redeploy either the employee making the complaint of harassment/sexual harassment, or the employee suspected of sexual harassment. Suspension will be on full pay and is precautionary and is not a disciplinary sanction. As soon as the investigation is complete, the Company will inform all parties of the outcome and decide if it is appropriate to start disciplinary proceedings.

On conclusion of the investigation, a report of the findings will be submitted to the manager who will hold the grievance meeting. The employee who has made the complaint will be invited to attend a meeting to discuss the matter. The meeting will be held in accordance with the Company's grievance policy.

If, following the hearing, it is decided that the allegation is well-founded, the harasser will be subject to disciplinary action up to, and including, dismissal in accordance with the Company's disciplinary procedure.

The Company is committed to ensuring employees are not discouraged from using this procedure and no employee will be victimised for having brought a complaint..

11 Consequences of Breach

Sexual harassment is a disciplinary offence and will be dealt with according to the Company's discipline procedure. Sexual harassment or victimisation may constitute gross misconduct, and may result in summary dismissal without notice.

Employees should bear in mind that harassment may also constitute a criminal offence which may be reported to the Police authorities.

12 Responsibilities of Employees and Managers

The Company requires its employees to behave appropriately and professionally at all times. All employees are responsible for their own behaviour and should ensure that they comply with this Policy at all times.

All managers are responsible for implementing this Policy and bringing it to the attention of employees.

Any complaints under this Policy bought to the attention of a manager must be dealt with promptly, confidentially, fairly and consistently.

All incidents of any harassment MUST be reported to the HR team, before any investigation or communication takes place. The HR team will advise and support the process.

Any form of harassment or victimisation may lead to disciplinary action up to and including dismissal if it is committed:

- In a work situation;
- During any situation related to work, such as a social event; or
- Against a colleague or other individual connected to the employer outside of a work situation, including on social media.
- Any action deemed to be discriminatory including Social Media content which may bring the Company into disrepute; e.g. domestic violence

13 Training

The Company will provide training to all our staff on sexual harassment and victimisation to ensure there is a clear understanding of:
what sexual harassment and victimisation is;

- Expected levels of behaviour;
- How employees can report any incidents of having been harassed or having witnessed such incidents; and
- How acts of sexual harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.
- In addition, the company will ensure that all managers are fully briefed on this policy..

14 Support and Advice

The Company will offer counselling and mediation where appropriate.
The Company will address unacceptable and/or inappropriate behaviour.

15 Confidentiality

The Company will treat any complaint received under this Policy confidentially.

All employees involved with an investigation are required to respect the need for confidentiality.

The Company will maintain records of investigations into alleged incidents of sexual harassment and the outcome of the investigations. These records will be maintained in confidence and in line with the Company's Data Protection Policy.

Any breaches in confidentiality will be subject to disciplinary action.

This policy has been agreed by the Powerlines UK Ltd Joint Managing Directors.

This policy is subject to statutory updates and may be amended at any time by the company, in order to meet these requirements.