

Dignity at Work Policy

1. Introduction

HTG Trading Ltd (“HTG”) is committed to creating a work environment free of bullying, intimidation, harassment and victimisation and have a duty to take **all reasonable steps** to prevent sexual harassment, and third-party harassment relating to any protected characteristic(s).

This policy should be read in conjunction with the Preventing Sexual Harassment Policy, Sexual Harassment Risk Assessment, Third-Party Harassment Risk Assessment, Grievance Policy and Disciplinary Policy.

2. Scope

This policy applies to directors, managers, employees, volunteers, contractors, agency staff, third parties and anyone else engaged to work at the organisation whether by direct contact with the organisation or otherwise.

3. Our Commitment

HTG is committed to providing a working environment in which everyone is treated with dignity and respect. Bullying, harassment, sexual harassment, discrimination and victimisation will not be tolerated under any circumstances.

We are committed to taking all reasonable steps to prevent sexual harassment and third-party harassment and responding promptly and appropriately to concerns raised by workers.

4. Definitions

4.1. Harassment

Unwanted conduct related to a protected characteristic (e.g., sex, race, disability, age, religion, sexual orientation, gender reassignment) that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment may occur in person, in writing, by telephone, email, messaging applications, video conferencing platforms, social media, text message or any other electronic communication method.

Examples include:

- Offensive jokes, slurs or comments
- Unwelcome physical contact
- Displaying offensive material
- Intrusive questions about personal life

4.2. Sexual Harassment

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.

Examples include:

- Sexual comments, jokes or innuendos
- Unwanted flirting or advances
- Displaying or sharing sexually explicit material
- Unwanted physical contact

- Repeated requests for dates after refusal
- Sexually suggestive emails, texts or messages

4.3. Third-Party Harassment

Harassment carried out by an individual who is not employed by the Company, such as a customer, client, supplier, contractor, visitor or member of the public.

Third-party harassment may relate to any protected characteristic or may involve sexual harassment.

4.4. Bullying

Offensive, intimidating, malicious or insulting behaviour, or misuse of power, that undermines, humiliates or injures the recipient.

Examples include:

- Persistent criticism or belittling
- Excluding someone from work-related activities
- Spreading rumours
- Misuse of authority

4.5. Victimisation

Retaliation against an individual for reporting harassment, supporting a complaint or participating in an investigation will not be tolerated and may result in disciplinary action up to and including dismissal.

5. Responsibilities

5.1. All Staff

- Treat colleagues with dignity and respect
- Behave professionally at all times
- Report concerns promptly
- Maintain confidentiality

5.2. Managers

- Lead by example
- Will take appropriate action when inappropriate behaviour is observed, whether or not a complaint has been made
- Support employees who raise concerns
- Will ensure concerns are reported and escalated to the relevant personnel (i.e. HR) promptly
- Will ensure no employee suffers retaliation for reporting concerns
- Promote a respectful workplace culture

5.3. HR Department

- Provide advice and support
- Oversee investigations
- Ensure compliance with employment law and GDPR
- Maintain secure records

6. *Raising a Concern*

6.1. Informal Resolution

Where appropriate, individuals are encouraged to:

- Speak directly to the person involved
- Explain the impact of the behaviour
- Seek support from a manager or HR
- Informal resolution is not suitable for serious allegations.

6.2. Formal Procedure

A formal complaint should be submitted to HR in writing, including:

- Details of the behaviour
- Dates, times and witnesses
- Any supporting evidence

HTG will:

- Acknowledge the complaint
- Appoint an impartial investigator
- Conduct a fair and timely investigation
- Provide written outcomes

Concerns involving customers, suppliers, contractors, visitors, or other third parties should be reported using the same reporting procedure. The Company will take reasonable steps to investigate concerns and implement appropriate measures to protect affected workers.

7. *Investigation Process*

7.1. Investigations will:

- Be conducted impartially
- Follow natural justice principles
- Allow all parties to present evidence
- Maintain confidentiality in line with GDPR
- Keep records securely and only for as long as necessary

7.2. Possible outcomes include:

- Mediation
- Training or coaching
- Disciplinary action (up to and including dismissal)
- No further action (with rationale provided)

8. *Confidentiality & GDPR*

HTG will handle all information in accordance with UK-GDPR and the Data Protection Act 2018.

This means:

- Only relevant information will be collected
- Data will be stored securely

- Access will be restricted to those with a legitimate need
- Records will be retained only for lawful, proportionate periods
- Individuals may request access to their personal data

9. *Malicious or Vexatious Complaints*

HTG takes all complaints seriously. However, knowingly false or malicious allegations may result in disciplinary action.

10. *Commitment to Monitoring*

HTG will periodically review harassment complaints, investigation outcomes, employee feedback, exit interview data and risk assessments to identify trends and determine whether additional control measures are required.

11. *Breach of this Policy*

- Compliance with this policy is essential to the protection of the Company's reputation, data security and legal obligations.
- While this policy does not form part of your employment contract, breaches or refusal to comply may result in disciplinary action.

12. *Monitoring and Review*

- HR will monitor compliance and trends
- This policy will be reviewed annually, or sooner if legislation changes
- Updates will be communicated to all staff

This policy has been checked, approved, & authorised by: Andrea Senior

Reviewed By: Andrea Senior

Document Approval: Mark Stebbings

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