Preventing Sexual Harassment Policy

1. Introduction

HTG Trading is committed to providing a safe, respectful and inclusive working environment where everyone is treated with dignity and respect. Sexual harassment and all forms of unlawful harassment are unacceptable and will not be tolerated.

If something feels uncomfortable, inappropriate or unwanted, we encourage you to raise it. We want to know about concerns so that we can act promptly, provide support and take appropriate action.

Employers have a legal duty to take proactive steps to prevent sexual harassment in the workplace. In addition, from October 2026, legal protections will be strengthened to require employers to take all reasonable steps to prevent harassment of employees by third parties, such as customers, clients, contractors and visitors.

HTG Trading is committed to:

- Preventing harassment before it occurs;
- Taking reasonable steps to protect employees from harassment by colleagues and third parties;
- Providing clear and accessible reporting routes;
- Investigating concerns fairly, promptly and confidentially;
- Taking appropriate action where concerns are substantiated; and
- Supporting anyone affected by harassment.

2. Scope

If it involves colleagues or affects your working environment, this policy applies — whether it happens in person, online, or outside normal working hours.

This policy applies to:

- All employees
- Workers, contractors, agency staff, and consultants
- Job applicants
- Anyone engaged in HTG business, whether on-site, off-site, or online

It covers conduct:

- In the workplace
- During work-related travel
- At work-related social events
- In digital spaces (Teams, email, messaging, social media)
- In any situation where working relationships may be affected

3. Behaviour Outside Work

Even if something happens outside the office — for example on social media, at a work meal, or during travel — if it affects someone at work, HTG will treat it seriously.

This includes:

- Work-related social events
- Business travel
- Online interactions between colleagues

- Private messaging where it impacts work

4. What Is Sexual Harassment?

Sexual harassment is anything sexual that you don't want and that makes you feel uncomfortable, embarrassed, intimidated, or upset.

It doesn't matter if someone "meant it as a joke" — if it's unwanted, it's not OK.

Under the Equality Act 2010, sexual harassment is:

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

Sexual harassment can be **verbal, non-verbal, physical, written, or digital**.

Examples include (not exhaustive):

- Sexual comments, jokes, or innuendo
- Unwanted touching or physical contact
- Suggestive looks, gestures, or body language
- Sharing sexual images or messages
- Repeated requests for dates or personal contact
- Comments about appearance or sexual orientation
- Sexual rumours or gossip
- Coercion, pressure, or implied threats
- Sending or displaying sexually explicit material

Digital and Online Sexual Harassment

Examples include:

- Sending sexual messages or images
- Unwanted video calls
- Inappropriate emojis or GIFs
- Comments in Teams chats
- Screenshots or sharing private images
- Sexualised memes

5. Definitions (Consent, Power Imbalance, Intent)

Definitions

- **Consent**: Consent must be freely given, informed, and reversible. Silence or lack of resistance does not equal consent.
- **Power imbalance**: Harassment can occur where one person has more influence or authority (e.g., manager/employee, senior/junior, client/contractor).
- **Intent**: The intention behind behaviour does not matter. What matters is the impact on the other person.

6. Micro-Behaviours & Early Warning Signs

Awareness of micro-behaviours and early warning signs can help employees recognise issues sooner and support early intervention.

Early Warning Signs

Sexual harassment often starts with smaller behaviours that may seem "minor" but still create discomfort.

Examples include:

- Comments about someone's clothing or body
- Standing too close or invading personal space
- Persistent compliments
- "Testing boundaries"
- Sending messages late at night
- Overly personal questions

HTG encourages employees to speak up early so concerns can be addressed before they escalate.

7. Third-Party Sexual Harassment

If someone outside the company behaves inappropriately — a customer, client, or visitor — HTG will step in and protect you.

HTG will take all reasonable steps to protect employees from sexual harassment by:

- Customers
- Clients
- Suppliers
- Visitors
- Members of the public

Employees must report concerns immediately so HTG can take appropriate action.

HTG recognises its legal responsibility to take all reasonable steps to prevent employees from being subjected to harassment by third parties in the course of their work and will take appropriate action where concerns are raised.

The Company will implement a range of measures to prevent and reduce the risk of third-party harassment. These may include, but are not limited to:

- Communicating the Company's zero-tolerance approach to harassment to clients, customers, contractors and other third parties where appropriate;
- Ensuring employees know how to report incidents of third-party harassment and are encouraged to raise concerns promptly;
- Investigating all reports of third-party harassment and taking appropriate action where concerns are substantiated;
- Keeping records of reported incidents and reviewing trends to identify areas of increased risk;
- Providing training and guidance to employees and managers on recognising, responding to and reporting harassment.

The Company will keep its arrangements for preventing third-party harassment under regular review and will implement any additional reasonable measures identified through risk assessments, reported incidents, employee feedback, operational changes or developments in legislation and guidance.

8. Responsibilities

Everyone has a role in keeping HTG safe and respectful. Managers have extra responsibilities to act quickly and set the tone.

All Employees Must:

- Treat others with dignity and respect
- Avoid any behaviour that could constitute harassment
- Report concerns promptly
- Support a culture where harassment is not tolerated

Managers Must:

- Model appropriate behaviour
- Act immediately on concerns or complaints
- Escalate issues to HR without delay
- Ensure no employee suffers detriment for raising concerns
- Take proactive steps to prevent harassment within their teams.

9. Bystander Expectations

If you see something that doesn't feel right, you can help — even just by checking in with the person afterwards.

Employees who witness sexual harassment are encouraged to:

- Speak up if safe to do so
- Interrupt or defuse the situation
- Check in with the affected colleague
- Report the incident to a manager or HR

HTG will support employees who intervene in good faith.

10. Reporting Concerns

You don't need proof.

You don't need to decide whether it's "serious enough".

If something feels wrong, HTG wants to know.

Employees can report concerns:

- To their line manager
- Directly to HR
- To any senior manager
- Through an informal conversation or a formal complaint
- Reports may be made verbally or in writing.

HTG will treat all reports seriously, sensitively, and confidentially

11. Record-Keeping

Maintaining appropriate records helps HTG identify risks, monitor trends and demonstrate that concerns have been managed appropriately.

HTG will keep confidential records of:

- Reports and concerns raised
- Actions taken
- Training completed
- Risk assessments

- Investigation outcomes

Records will be stored securely and only accessed by authorised HR personnel.

12. How HTG Will Respond

HTG will listen, take you seriously, keep things private, and act quickly.

HTG will:

- Acknowledge the concern promptly
- Offer support to the employee
- Assess immediate risks and take protective steps
- Decide whether informal resolution or formal investigation is appropriate
- Conduct investigations promptly, fairly, and impartially
- Keep the employee updated throughout.

Safeguarding & Immediate Risk

Where there is an immediate risk to safety, HTG may take urgent protective action, such as separating parties, adjusting duties, or removing individuals from the workplace while an investigation is carried out.

13. Risk Assessments

HTG will undertake periodic assessments of the risk of sexual harassment occurring in the workplace. Such assessments may take account of:

- Customer-facing activities;
- Lone working;
- Work-related travel;
- Out-of-hours working;
- Work-related social events; and
- Any trends identified through complaints, reports of employee feedback

14. Victimisation

Protection from Victimisation - Employees must not be treated unfavourably because they:

- Raise a concern;
- Support someone else's complaint;
- Act as a witness; or
- Intervene as a bystander

Examples of victimisation include:

- Excluding someone from meetings;
- Reducing shifts or responsibilities;
- Negative comments or gossip;
- Unfair criticism;
- Withholding information needed for work or;

- Pressuring someone to withdraw a complaint.

HTG will take any form of victimisation seriously.

Zero-Tolerance for Retaliatory Counter-Complaints

- HTG will not accept retaliatory counter-complaints made with the intention of discouraging or undermining a genuine report.

15. Step-By-Step Investigation Process

An investigation is simply a fair, private process to understand what happened. You'll be kept informed and supported throughout.

1. Allocation of Investigator

- A trained, impartial investigator will be appointed
- External investigators may be used if needed

2. Timescales

- Investigations will normally be completed within 10-20 working days, although this may vary depending on the complexity of the matter.

3. Evidence Gathering

May include:

- Interviews
- Witness statements
- Digital evidence
- CCTV or access logs

4. Witness Interviews

- Conducted confidentially
- Witnesses must cooperate honestly

5. Confidentiality Boundaries

- Information shared only on a need-to-know basis

6. Outcome and Findings

- Communicated in writing
- May include disciplinary action or other measures

7. Right to Be Accompanied

- Employees may bring a colleague or union representative

8. Appeal Process

- Appeals must be raised within 5 working days

16. Support for Employees Accused of Misconduct

Support for Employees Accused of Misconduct

- HTG recognises that being accused of misconduct can be distressing.
- Employees who are the subject of an allegation will also be treated fairly, kept informed, and offered appropriate support during the process.

17. Confidentiality

Information will be shared only on a need-to-know basis. Confidentiality will be respected unless:

- There is a safeguarding risk
- There is a legal obligation to disclose
- It is necessary to conduct a fair investigation

18. Training, Preventative Measures and Reasonable Steps

To meet its legal duty to take reasonable steps, HTG will:

- Provide training for all staff
- Provide enhanced training for managers
- Keep training records
- Review incidents to identify patterns
- Ensure managers understand their responsibilities
- Maintain clear reporting routes
- Conduct risk assessments
- Ensure digital conduct standards are understood
- Embed prevention into onboarding
- Communicate expectations regularly
- Intervene early when inappropriate behaviour is observed

19. Support for Employees

You won't go through this alone. Support is available at every stage.

HTG will offer:

- HR support
- Consider adjustments to working arrangements where feasible
- Support via the Mental Health First Aiders
- Explore support through external services
- A safe space to discuss concerns

20. False or Malicious Allegations

- Genuine mistakes or misunderstandings are not misconduct
- Deliberately false or malicious allegations may result in disciplinary action

21. Disciplinary Action

Sexual harassment is a serious disciplinary offence.

Depending on the circumstances, outcomes may include:

- Formal warnings
- Mandatory training
- Removal from duties
- Redeployment

- Dismissal for gross misconduct

22. Breach of this Policy

Any employee or associated person who breaches this policy may face disciplinary action, including dismissal for gross misconduct.

23. Policy Interaction (Links to Other Policies)

This policy should be read alongside HTG's:

- Disciplinary Policy and Procedure
- Grievance Policy and Procedure
- Code of Conduct
- Equality, Diversity & Inclusion Policy
- Social Media & Digital Conduct Policy
- Whistleblowing Policy

24. Monitoring and Review

HR will monitor compliance with this policy and review it annually or sooner if legislation or guidance changes.

25. Communication & Accessibility

HTG will ensure this policy is:

- Shared with all new starters during onboarding
- Accessible on internal systems
- Discussed during team briefings where appropriate
- Reinforced through regular training and reminders

Employees may request the policy in alternative formats if needed.

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

Reviewed By: Andrea Senior
Document Approval: Mark Stebbings
Last Review Date: July 20 | July 21 | July 22 | July 24 | Nov 25 | Oct 26
Next Review Date: January 2027

Appendix 1 – Manager Responsibilities Checklist

Managers must:

- ☐ Act immediately when concerns are raised
- ☐ Escalate issues to HR the same day
- ☐ Avoid making assumptions or informal judgments
- ☐ Protect confidentiality
- ☐ Support the employee raising the concern
- ☐ Take steps to prevent further contact if needed
- ☐ Document actions taken
- ☐ Model respectful behaviour at all times