ANTI-HARASSMENT AND ANTI-BULLYING POLICY

This policy statement relates to all employees at Energys Group Limited (comprising of Energy Conservation Solutions Ltd, Cube Lighting & Design and Cube Solar Installations Limited).

Energy Group recognises that all employees have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. We are committed to eliminating intimidation in any form.

The Policy applies to harassment on the grounds of disability, gender, marital status, sexual orientation, age, creed, colour, race or ethnic origin.

Harassment breaches company policy as outlined and it is classified as a serious offence which may result in disciplinary action, including summary dismissal under the Disciplinary Procedure.

Harassment is generally described as "unwanted conduct which affects the dignity of employees at work; it encompasses unwelcome physical, verbal or non-verbal behaviour which denigrates or ridicules or is intimidatory". The essential characteristic of harassment is that the action is unwanted by the recipient.

The following interpretations and examples of harassment may be helpful in determining whether harassment has taken place.

General Harassment

Harassment may involve action, behaviour, comment or physical contact which is found objectionable or which causes offence; it can result in the recipient feeling threatened, humiliated or patronised and it can create an intimidating work environment.

Racial or Sectarian Harassment

In the workplace, racial or sectarian harassment may take the form of actual or threatened physical abuse or it may involve offensive jokes, verbal abuse, language, graffiti or literature of a racist or sectarian nature or offensive remarks about a person's skin colour, physical characteristics or religion. It may also include repeated exclusion of a person from an ethnic or religious minority from conversations, patronising remarks, unfair allocation of work or pressure about the speed and/or quality of their work in a way which differs from the treatment of other employees.

Bullying

Bullying is the intimidation or belittling of someone through the misuse of power or position which leaves the recipient feeling hurt, upset, vulnerable or helpless. The following are examples of bullying:

- Unjustified criticism of an individual’s personal or professional performance, shouting at an individual, criticising an individual in front of others
- Spreading malicious rumours or making malicious allegations
- Intimidation or ridicule of individuals with disabilities and /or learning difficulties
- Ignoring or excluding an individual from the team / group

Responsibilities of Managers

Every manager has an obligation to prevent harassment / bullying and to take immediate action once it has been identified, whether or not a complaint has been made.

Allegations of harassment or bullying, received either informally or formally, must be dealt with promptly and sensitively.

It is important that managers recognise that sexual harassment is any sexual advance unwanted by the recipient or behaviour which causes offence to the recipient. Similarly, racial harassment is behaviour which is racially offensive to the recipient. Managers must therefore take care to ensure that they do not pre-judge situations based on their own sexual or racial attitudes and perceptions.

Responsibilities of all Employees

Every employee has a personal responsibility **NOT** to harass or bully other members of staff.

An employee who becomes aware of harassment or bullying occurring should bring the matter to the attention of his/her manager.

Redress

An employee who feels they have been harassed or bullied has a right to seek redress via the procedures set out below.

Procedure for Dealing with Harassment

An employee who feels they are being subjected to harassment or bullying may attempt to resolve the matter informally in the first instance. In some cases it may be possible and sufficient for them to explain clearly to the person(s) engaged in the unwanted activities that the behaviour is unwelcome, that it offends or makes them uncomfortable.

If at the initial informal discussion stage the circumstances are too difficult or embarrassing to approach the harasser alone, the complainant may wish to:

- Be accompanied by a friend or colleague
- Write a letter to the harasser (research has shown this to be very effective)
- Keep a record of any incidents, detailing when, where, what occurred, and witnesses (if any)

In some cases victims of harassment or bullying may not be sufficiently confident to tell the harasser that his or her behaviour is unacceptable. The Company emphasises therefore that staff **are not required** to approach the harasser in an attempt to resolve the problem informally, and are entitled to report the matter immediately if they so wish.

Where the steps outlined above are unsuccessful or inappropriate, the complainant should raise the matter informally and in confidence with their manager. Alternatively, the matter may be raised with a more senior manager or HR. For example, if the complaint relates to the conduct of their manager, the complainant may choose to discuss the matter with another manager.

The Manager will discuss the matter with the complainant and agree a course of action. The complainant may be accompanied by a representative or work colleague at these meetings. The alleged harasser will also have the right to state their version of events to the manager and to also be accompanied by a representative or colleague.

The complainant must be assured that they will not be discriminated against or victimised for raising the complaint. Confidentiality will be observed throughout and the need for any disclosure of the details of the case will be discussed and agreed.

At any stage of the process the complainant, the manager dealing with the complaint or the accused may feel that they need the help of an independent person before deciding on the best course of action. The Company will seek the advice of suitable trained persons who can give confidential advice and assistance, including:

- Advising on the nature of harassment
- Offering guidance on resolving harassment problems, including acting as an independent broker

If the situation cannot be resolved informally then the complainant has the right to pursue their complaint formally via the Company's Grievance Procedure.

Where management consider that there may be evidence of harassment, they may consider it appropriate to undertake a full investigation of the circumstances. In this case a manager not connected with the department involved, or an individual external to the Company will be commissioned to undertake this investigation. Best practice in relation to confidentiality will be maintained during this investigation; and both the complainant and alleged harasser will have the opportunity to have their say. The investigator will also interview and take statements from any appropriate witnesses to the alleged harassment.

Where there is evidence that harassment has occurred, prompt and corrective action will be taken, including disciplinary action where appropriate. Harassment is a serious offence which may result in summary dismissal.

Reporting

- On site incidents are reported to the Engineering Services Manager and the Operations Director
- Office related incidents are reported to the Group Services Director and the Compliance Administrator

COMMUNICATION

All staff will be informed of the harassment and bullying policy and procedure. They must be re-assured regarding:

- Fear that others will consider the behaviour trivial and not take complaints of harassment seriously
- Fear that no action will be taken against a person guilty of harassment
- Fear of retaliation or victimisation in registering a complaint either informally or formally through the grievance procedure.

TRAINING

The anti-harassment and anti-bullying policy will be part of staff induction.

Training will be provided for those employees who have a specific responsibility for implementing this procedure or who may be involved in dealing with complaints which arise.

Evidence of Implementation

Evidence maintained by the Company may include:

- Training records and attendance logs.
- Signed policy acknowledgements.
- Risk assessments and action plans.
- Records of reported concerns, investigations, and outcomes.
- Internal audit and management review records.
- Communications issued to employees and third parties regarding expected standards of behaviour.
- Records of actions taken in response to incidents involving third parties.

MONITORING AND REVIEW

In order to assess the effectiveness of the policy, statistics will be maintained in respect of the complaints of harassment. Strict confidentiality will be maintained and the monitoring process will comply with the Data Protection Act.

The effectiveness of this policy will be reviewed regularly.



Signed: _____ **Date: 1st November 2026**

Kevin Cox
Managing Director
On behalf of Energys Group