# SEXUAL HARASSMENT 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 sexual harassment. We are committed to eliminating intimidation in any form.

## Sexual Harassment

Sexual harassment can be defined as an uninvited, unreciprocated and unwelcome behaviour of a sexual nature which is offensive to the person involved and causes that person to feel threatened, humiliated or embarrassed. Examples of sexual harassment are:

- Requests for sexual favours, including implied or overt promises of preferential treatment or threats concerning present or future employment status
- Offensive gestures or comments
- Sexually-orientated jibes, innuendo or jokes
- Unwanted physical contact
- The display or sharing of sexually offensive visual material such as calendars, photographs, books or videos
- Repeated requests for dates after being declined
- Sexually suggestive emails, messages, or social media communication
- Comments about a person's appearance that are sexual in nature
- Staring, leering or other suggestive gestures

Sexual harassment may occur regardless of gender, sexual orientation, or position within the organisation and may also occur when dealing with external clients and/or members of the public.

## Prevention of Sexual Harassment

The Company is committed to providing a working environment that is free from sexual harassment and will not tolerate sexual harassment of workers by employees, contractors, agency workers, clients, customers, suppliers, visitors, or any other third party.

### Arrangements to Prevent Sexual Harassment

The Company has implemented the following arrangements to prevent sexual harassment:

- A clear Anti-Bullying and Anti-Harassment Policy that defines unacceptable behaviours and sets out standards of conduct expected from all workers and third parties.
- Regular communication of the policy to employees, agency workers, contractors, and relevant third parties.
- Mandatory training for managers and employees on recognising, preventing, and reporting harassment and inappropriate behaviour.

- Risk assessments to identify situations where workers may be at increased risk of sexual harassment, including lone working, customer-facing roles, travel, social events, and interactions with contractors or suppliers.
- Clear reporting procedures that allow concerns to be raised confidentially and without fear of victimisation or retaliation.
- Prompt, fair, and impartial investigation of all complaints and concerns.
- Appropriate disciplinary action where allegations are substantiated.
- Measures to address harassment by third parties, including challenging unacceptable behaviour, restricting access to premises, terminating contracts where appropriate, and reporting incidents to relevant authorities if necessary.
- Regular review of sexual harassment risks, incident reports, and the effectiveness of preventative measures.

# Responsibilities

## Managers and Supervisors

- Promoting a respectful workplace culture
- Addressing inappropriate conduct promptly
- Taking all complaints seriously
- Reporting complaints in accordance with this policy
- Cooperating with investigations

## Employees

- Treating others with dignity and respect
- Refraining from engaging in harassment
- Reporting harassment concerns promptly
- Cooperating in investigations when required

# Reporting

- On site incidents are reported to the Engineering Services Manager and the Head of Operations
- Office related incidents are reported to the Group Services Director and the Compliance Administrator
- Reports may be made verbally or in writing.

# Investigation process

All complaints will be:

- Taken seriously
- Handled promptly and impartially

- Treated confidentially
- Investigated fairly and thoroughly

The company will seek to protect the rights of all parties involved during the investigation process.

## Protection against retaliation

Retaliation against anyone who reports sexual harassment, participates in an investigation and supports a complainant is strictly prohibited. Any retaliation will be treated as a disciplinary matter and may result in disciplinary action.

## 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.

## Communication

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

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

## Training

The Sexual harassment policy and training will be part of staff induction.

## Monitoring and review

In order to assess the effectiveness of the policy, statistics will be maintained in respect of the complaints of sexual 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 and updated as necessary to ensure compliance.



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

**Kevin Cox**
**Managing Director**
**On behalf of Energys Group**

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