Anti-Bullying & Harassment Policy ALL-XX-POL-X-X-024-R.05 May 2025

SDC Builders Ltd.

We the Directors of SDC Builders Ltd are committed to providing a working environment free from bullying and harassment. We aim to ensure that all staff are treated, and treat others, with dignity and respect.

This policy covers bullying or harassment which occurs at work and out of the workplace, including at work related events or social functions.

This policy applies to all employees at all levels. Where we rely on the services of sub-contractors and consultants we would expect them to accept the terms of this policy or to have their own policy which sets out standards to match our own.

Organisation

All employees of the company need to understand and recognise bullying and harassment so they can take the appropriate action to guard against it. Staff must treat everybody with dignity and respect. They should always consider whether their words or conduct could be offensive. Even unintentional bullying or harassment is unacceptable.

Harassment - Definition

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

A single incident can amount to harassment. A person may be harassed even if they were not the intended "target". Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

It is unlawful under the Equality Act 2010 to harass a person because of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or nation origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment - Unacceptable Behaviour

Example of harassment include, but are not limited to:

- unwanted physical conduct including touching, pinching, pushing and grabbing.
- unwelcome sexual advances or suggestive behaviour.
- offensive emails, text messages or social media content or the display of offensive materials.
- unwanted jokes, banter, mocking, mimicking or belittling a person.

Bullying - Definition

Bullying is being offensive, intimidating, malicious, displaying insulting behaviour, abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear of intimidation, not necessarily from someone in a position of

Page 1 of 3 ALL-XX-POL-X-X-024-R.05

authority.

Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including text messages, email or social media.

Bullying - Unacceptable Behaviour

Examples of bullying include, but are not limited to:

- physical or psychological threats.
- overbearing or intimidating levels of supervision.
- inappropriate derogatory remarks about a person or their performance.
- shouting at staff.
- persistently picking on people whether in front of others or in private.
- blocking promotion or training opportunities.
- regularly and deliberately ignoring or excluding staff from work activities or work-related social events.
- setting a person up to fail by overloading them with work or setting impossible deadlines.
- regularly making the same person the butt of jokes.

Legitimate and reasonable criticism of a staff member's performance or behaviour, or reasonable management instructions, do not amount to bullying on their own.

Staff should disclose any instances of harassment or bullying of which they become aware to their manager or to the Human Resources department.

Breaches of this Policy

Bullying and harassment are not tolerated in our workplaces. All staff are required to treat each other, along with subcontractors, suppliers, consultants, clients and visitors with dignity and respect.

Breaches of this policy will be dealt with in accordance with our disciplinary procedure. Serious cases of bullying or harassment may amount to gross misconduct resulting in dismissal.

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our disciplinary procedure. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our disciplinary procedure.

Arrangements

If an employee believes they are being harassed or bullied, they may wish to raise the problem informally with the person responsible, if they feel able to do so. They should explain clearly to the person responsible that their behaviour is not welcome or makes them feel uncomfortable. If the employee feels this is too difficult or embarrassing to do then they should speak to the Human Resources department who can provide confidential advice and assistance in resolving the issue formally or informally.

If the employee feels that informal steps are not appropriate, or they have been unsuccessful, they should raise the matter formally under our grievance procedure. All complaints will be investigated in accordance with our grievance procedure.

If there is sufficient evidence to suggest the employee has been harassed or bullied we will consider the appropriate action to take. If the person accused is another employee this may include invoking our disciplinary procedure. Whether or not the complaint is upheld, we will consider how best to manage any ongoing working relationship between the employee and the person concerned.

This policy will be communicated to all employees. It will be reviewed following any changes to the organisation, company processes or legislation to ensure that its aims remain current.

Signed

Adam Knaggs

Managing Director

Francis Shiner

Chairman

Gary Wykes

Director

Andrew Mitchell

Finance Director

Andrew Shiner

Director

Carl Bennett

Director

Dan Changer

Director

Jonathan Richardson

Finance Director

7.R.N