

# RWS Group

## Harassment, Bullying and Victimization Policy and Procedure

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## 1 Document history

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## 2 Scope

This document details the approach RWS Holdings plc and its subsidiaries will take to provide guidance to all employees on the Policy and Procedure relating to harassment, bullying and victimization to comply with the Equality Act 2010. As RWS has its head office in the UK, and is publicly listed on the Alternative Investment Market (AIM), the London Stock Exchange regulated market, the Group policies are UK law compliant.

## 3 Associated documents

- HR Disciplinary Policies and Procedures

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## 4 Policy and introduction

- 4.1 RWS is committed to providing a working environment which is free from harassment, bullying and victimization. Harassment in any form can subject individuals to fear, stress and anxiety. This can lead to illness, accidents, absenteeism, poor performance and demotivation, and ultimately has a negative effect on business success.
- 4.2 RWS will not tolerate any form of harassment, bullying or victimization, be it inside or outside the working environment by any employee or independent contractor of the Company, or by any outside persons in contact with our employees and independent contractors (including our clients, potential clients, vendors, delivery persons, etc.).
- 4.3 Nothing in this policy forms part of anyone's contract of employment, partnership or service agreement nor does this policy confer any contractual or other rights on our staff.

## 5 What is harassment, bullying and victimization?

- 5.1 Harassment, bullying and victimization include, but are not limited to, the definitions below.
- 5.1.1 Harassment may take the form of sexual or racial harassment, or harassment for other reasons including age, religious beliefs, gender or sexuality, disability, personal dislike, etc. Harassment is conduct which results in someone feeling threatened or compromised. It can be non-verbal (e.g. offensive gestures / emails, photos, graffiti), verbal (e.g. racist or sexually explicit jokes, personal comments, threats or unwanted propositions) or physical (e.g. unwelcome contact of a sexual nature, jostling, assault).
- 5.1.2 Bullying is the persistent demeaning and degrading of someone through vicious words and/or cruel acts which undermine their confidence and self-esteem. It can occur between an employee and a supervisor/manager or vice versa, or by one colleague to another. Bullying can be non-verbal (e.g. undermining status/credibility, isolation, non-cooperation), verbal (e.g. threats, derisory remarks, criticizing the person to others) or physical (eg. physical intimidation, ostracism, excessive supervision).
- 5.1.3 Victimization takes place when an employee is treated unfavourably as a direct result of raising a genuine complaint of discrimination or harassment.

## 6 Procedure

- 6.1 The purpose of this procedure is to deal with allegations of such behaviour in a swift, thorough, confidential and sensitive manner.

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- 6.2 If an employee experiences any of these types of behaviour they should speak to their divisional or local HR team. The HR team will provide confidential support and guidance and advise on the possible courses of action.
- 6.3 In the first instance employees are encouraged to deal with the matter informally, if possible, by making it clear to the perpetrator that the behaviour is unacceptable and unwelcome. In these circumstances it is recommended that the employee approach the perpetrator in the presence of another person. If the employee feels unable to approach the perpetrator, they should request support from their manager or HR team.
- 6.4 Where an initial approach has failed or the employee prefers not to raise the matter informally, they should inform their manager or HR team that they wish to make a formal complaint of harassment in writing. If the complaint is against their manager, they should not lodge the complaint through him/her.
- 6.5 If the complaint is upheld, the perpetrator will be liable to disciplinary action under HR Disciplinary Policies and Procedures, up to and including dismissal. If any victimization or retaliation occurs this may be treated as serious misconduct and employees should report it to their manager or HR team. Retaliation against any person for reporting or threatening to report harassment, or for participating in an investigation of harassment, is prohibited.
- 6.6 If a director, senior manager, manager or team leader becomes aware of any potential harassment, bullying or victimization, they must notify a Divisional Director or Head of HR within 24 hours. If in any doubt, it is vital to speak up in any event.
- 6.7 Line managers must collect information to allow any allegations to be passed on to the Divisional Director or Head of HR where necessary.
- 6.8 Once notified, the Divisional Director or Head of HR where necessary will meet and review the information collected and determine the appropriate course of action to be taken. They will then report back to all relevant parties.
- 6.9 If the employee is not satisfied with the response, they have the right of appeal to the Divisional President where necessary.

## 7 Policy review

- 7.1 This Policy is available on the Group's intranet. If there are amendments to the applicable legislation or regulatory requirements, the Policy will be amended to reflect these. There will be an annual review by the person responsible for the Policy to ensure the document is fit for purpose and remains effective. Any changes will be communicated by email by way of the "Regulatory and compliance update", team briefings or training, depending on the complexity of the amendment.

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