

Anti-Bullying & Harassment Policy

Policy Statement

CENTURY Tech Limited is 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 on work trips or at work-related events or social functions. This policy applies to directors and employees of CENTURY Tech at all levels.

We are an equal opportunities employer. This means that we will make good faith efforts to comply with the spirit and letter of the equality laws and other laws.

We will promote a harmonious working environment in which our employees will be treated with dignity and respect. We will not bully them, nor will we discriminate unlawfully against them or harass them on the "equality grounds"; which are; sex, pregnancy, gender reassignment, marital or civil partnership status, racial group, age, religious or similar philosophical belief, sexual orientation, political opinion or disability.

What is Harassment?

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 national origin, religion or belief, sex or sexual orientation. It also includes conduct of a sexual nature (sexual harassment).

Harassment is unacceptable even if it does not fall within any of these categories. Examples 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, slack messages, text messages or social media content or the display of offensive materials
- Unwanted jokes, banter, mocking, mimicking or belittling a person

Anti-Bullying & Harassment Policy – Page 1



What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour, an 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 or intimidation, not necessarily from someone in a position of authority.

Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, slack message, email and social media. Examples of bullying include:

- Physical or psychological threats
- Overbearing and intimidating levels of supervision
- Inappropriate derogatory remarks about a person or their performance
- Shouting at staff
- Persistently picking on people in front of others or in private
- Blocking promotion and 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.

Consequences

Breaches of this Anti-Bullying and Harassment Policy are not tolerated in our workplace and all staff are required to treat each other, along with our customers, suppliers, and visitors, with dignity and respect.

Breaches of this policy will be dealt with in accordance with our Code of Conduct. 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.

Anti-Bullying & Harassment Policy – Page 2









Reporting Bullying or Harassment

If you believe you are being harassed or bullied, you may wish to raise the problem informally with the person responsible. Explain the situation and how it has made you feel. It can be helpful to describe the event so the other person is clear about your concerns. Use the opportunity to ask the person to change or stop their behaviour.

Alternatively, you may speak to your manager who can provide confidential advice and assistance in resolving the issue formally or informally. If you do not feel that informal steps are appropriate, or they have been unsuccessful, you should raise the matter formally in writing to your line manager or their line manager. All complaints will be investigated accordingly and if we consider that there is sufficient evidence to suggest you have been harassed or bullied we will consider the appropriate action to take. If the person accused is an employee, this may include invoking our disciplinary procedure. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

Employees' Responsibilities

All our employees must comply with this policy. They must treat each other with dignity and respect. They must not themselves commit any acts of harassment or bullying against any person, such as their co-workers, our job applicants or our customers. Such behaviour will not be permitted or condoned. We will treat it as misconduct which may warrant dismissal from employment.

All our employees should discourage harassment and bullying by making it clear that they find such behaviour unacceptable and by supporting co-workers who suffer such treatment. Any employee who is aware of any incidence of harassment or bullying should alert a manager or supervisor to enable us to deal with it.

Employer's responsibilities

We will continually make good faith efforts to implement this policy. The main responsibility for this will be carried out by Priya Lakhani, Founder and CEO. Line managers and supervisors also have a special responsibility for enforcing this policy on a day-to-day basis, especially in setting a good example for other employees to follow and for intervening where necessary to protect and reassure employees.

To implement this policy, we will:

- provide all employees, line managers and supervisors with a copy of this policy and explain it to them
- provide appropriate training to line managers and supervisors where necessary

Anti-Bullying & Harassment Policy – Page 3





- ensure that all complaints of harassment and bullying are dealt with promptly, seriously and confidentially and in accordance with our internal grievance procedure
- set a good example by treating employees with fairness, dignity and respect
- be alert to unacceptable behaviour and take appropriate action to stop it
- monitor all incidents of harassment and bullying and review the effectiveness of this policy periodically

Last updated: 12th May 2023 Next review: May 2024

Signed: RURLinia Name: Rahul Bakrania