

Harassment-Free Workplace Policy

Policy Statement

Buxton Building Contractors Ltd is committed to providing a working environment based on dignity, trust, and respect, and free from discrimination, harassment, bullying, and victimisation, including sexual harassment.

The Company operates a zero-tolerance approach to such behaviour. All concerns will be taken seriously and addressed promptly, fairly, and appropriately.

The Company recognises its legal duty to take reasonable steps to prevent sexual harassment and is committed to taking proactive measures to reduce the risk of such behaviour occurring.

Scope

This policy applies to:

- All employees, directors, and temporary staff
- Subcontractors, consultants, agency workers, and suppliers
- Clients, customers, and any third parties interacting with the Company

It applies to all stages of the employment relationship and to conduct:

- In the workplace and on site
 - During work-related activities
 - When representing the Company
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Definitions

- **Harassment:** Unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.
 - **Sexual Harassment:** Unwanted conduct of a sexual nature that has the same effect.
 - **Bullying:** Offensive, intimidating, malicious, or insulting behaviour, or misuse of power, which undermines, humiliates, or injures the recipient.
 - **Victimisation:** Treating someone unfairly because they have raised or supported a complaint.
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Prevention of Sexual Harassment

The Company will take reasonable and proactive steps to prevent sexual harassment in the workplace.

This includes:

- Identifying and assessing risks of sexual harassment, including in site environments and interactions with third parties
- Implementing appropriate control measures to reduce identified risks

- Providing training and guidance to employees and managers
 - Promoting a culture of respect, dignity, and inclusion
 - Maintaining clear and accessible reporting routes
 - Taking prompt action where risks or concerns are identified
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Expected Standards of Behaviour

All individuals must:

- Treat others with dignity, courtesy, and respect
 - Not engage in any form of harassment, bullying, or victimisation
 - Avoid behaviour that could be perceived as inappropriate or offensive
 - Challenge or report inappropriate behaviour where appropriate
 - Support a safe and inclusive working environment
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Third-Party Conduct

The Company expects all third parties to meet the standards set out in this policy.

Where employees experience harassment or bullying from a third party:

- The matter will be taken seriously and investigated
- The Company will take appropriate action, including raising the issue with the third party
- In serious cases, this may result in termination of the business relationship

The Company will take reasonable steps to prevent sexual harassment by third parties in connection with its business activities.

Prevention and Controls

The Company is committed to preventing harassment and bullying through:

- Clear policies and communication of expected standards
 - Training for employees and managers
 - Risk assessments, including specific consideration of sexual harassment risks
 - Access to advice and support, including independent HR support where appropriate
 - Regular review of workplace culture and behaviours
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Reporting Concerns

Any individual who experiences or witnesses harassment or bullying must report it as soon as possible.

Reports may be made to:

- A line manager; or

- A Director; or
- The Finance Director; or
- Through the Company's Whistleblowing Policy

Concerns may be raised verbally or in writing.

All reports will be treated seriously and handled confidentially, unless disclosure is required for investigation or legal purposes.

The Company will not tolerate retaliation against anyone who raises a concern in good faith.

Investigation

All complaints will be investigated promptly, impartially, and thoroughly.

Investigations will:

- Be conducted by appropriately trained and, where possible, independent personnel
- Be proportionate to the nature and seriousness of the complaint
- Comply with confidentiality and data protection requirements

Serious matters will be escalated to senior management and, where appropriate, the Board.

Disciplinary Action

Where harassment or bullying is established, the Company will take appropriate action, which may include:

- Disciplinary action up to and including dismissal
 - Removal from site or termination of contract (for third parties)
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Responsibilities

Directors

- Promote a culture of dignity, respect, and inclusion
- Ensure effective implementation of this policy

Managers

- Lead by example
- Take reasonable steps to prevent harassment within their teams
- Address inappropriate behaviour promptly
- Support employees raising concerns

Employees and Associated Persons

- Comply with this policy
- Treat others with respect

- Report concerns where appropriate

Monitoring and Review

The Company will monitor the effectiveness of this policy, including reviewing risks and incidents, and will update it as required.

This policy will be reviewed annually or sooner if required by changes in legislation or business operations.

Suzanne Clark

Suzanne Clark

Director of Finance and Human Resources
Buxton Building Contractors Ltd

Date: April 2026

Next Review Date: April 2027