Harassment and Bullying Policy

Revision Matrix

Entity: SAFO UK Limited (company number 06478031), York House, 41 Sheet Street, Windsor, Berkshire, SL4 1DD.

Policy owner: Claudia Barbotto, Managing Director. Next review: November 2027.

Definitions: in this document, "the Company" means SAFO UK Limited. "SAFO GROUP S.p.A." is the Italian head company of the Group, and "the Group" or "SAFO Group" means SAFO GROUP S.p.A. together with the companies it controls and the Company. This document applies to the Company in the United Kingdom, its directors, employees and all persons acting on its behalf. References to the Group apply to other Group companies only to the extent of their activities in or connected with the United Kingdom.

Version	Date	Subject	Prepared by	Approved By
1.0	27.10.2026	First issue	Legal Department / A.C.T. London Limited	CB

1. Purpose

The Company is committed to providing a working environment in which everyone is treated with dignity and respect. Harassment, sexual harassment, bullying and victimisation are not tolerated in any form.

This Policy explains what is meant by harassment and bullying, the steps the Company takes to prevent them, how concerns can be raised and how they will be dealt with. It supports the Code of Ethics and Conduct and the Diversity and Inclusion Policy and should be read together with the Employee Handbook and the Whistleblowing Procedure.

2. Scope

This Policy applies to all employees, workers, agency staff, contractors, consultants and interns of the Company, at the workplace, at client premises, when working remotely, at work-related events and social functions, and in communications by any means, including email, messaging and social media.

It also covers harassment of our staff by third parties, such as clients, suppliers and visitors, and harassment of third parties by our staff.

3. What is harassment, sexual harassment, bullying and victimisation

Harassment
Harassment is unwanted conduct related to a protected characteristic (age, disability, gender reassignment, race, religion or belief, sex or sexual orientation) which 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.

Sexual harassment
Sexual harassment is unwanted conduct of a sexual nature which has that purpose or effect. It includes treating someone less favourably because they have rejected or submitted to such conduct. Examples include unwelcome physical contact, sexual comments or jokes, suggestive looks or gestures, unwanted messages or images, and requests for sexual favours.

Bullying
Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or injures the person on the receiving end. Examples include shouting or swearing at someone, persistent unjustified criticism, deliberately excluding someone, spreading malicious rumours and setting unreasonable deadlines or workloads. Reasonable management instructions and fair feedback on performance are not bullying.

Victimisation
Victimisation is treating someone badly because they have made, or supported, a complaint of harassment or discrimination in good faith, or have given evidence in connection with one.

4. Prevention

The Company takes all reasonable steps to prevent harassment, including sexual harassment, of its employees in the course of their employment, including harassment by third parties. In particular, the Company:

- communicates this Policy to all staff on joining and whenever it is updated, and asks staff to confirm that they have read it;
- provides training on this Policy on joining and as an annual refresher through the Company's online training platform, and records completion in the HR Compliance Matrix;
- carries out and keeps under review a short risk assessment of the situations in which harassment could occur, including work at client premises and contact with clients and suppliers, and acts on its findings;
- makes clear to clients, suppliers and visitors, where appropriate, that harassment of our staff is not acceptable;

- deals promptly and fairly with every concern raised and reviews each case to identify lessons learned.

5. Responsibilities

- **Managing Director:** owns this Policy, makes sure it is implemented and reviews the risk assessment and the cases recorded.
- **Managers:** set a good example, are alert to inappropriate behaviour, deal with concerns promptly and confidentially, and escalate them to the Managing Director.
- **All staff:** treat colleagues and others with dignity and respect, do not harass or bully anyone, and report any harassment they experience or witness.

6. How to raise a concern

If you feel able to, you may first ask the person concerned to stop, explaining that their behaviour is unwelcome. You do not have to do this, and you should not if you feel uncomfortable or the conduct is serious.

You can raise a concern, including about conduct by a client, supplier or visitor:

- with your line manager or the Managing Director;
- formally, under the Grievance procedure in the Employee Handbook;
- with the Whistleblowing Officer (Claudia Barbotto) or, where the concern relates to the Whistleblowing Officer, the alternate contact (Jane Taylor); or
- through the whistleblowing platform, which allows concerns to be raised anonymously, in accordance with the Whistleblowing Procedure.

Concerns about sexual harassment may also be raised as a disclosure under the Whistleblowing Procedure.

7. How the Company will respond

All concerns are taken seriously and dealt with promptly, fairly and as confidentially as possible. Where appropriate, the Company will investigate, and the person raising the concern and the person accused will each have the opportunity to give their account and to be accompanied at any formal meeting, in line with the ACAS Code of Practice on Disciplinary and Grievance Procedures. The Company may take interim measures, such as changes to working arrangements, while a concern is investigated.

Where harassment or bullying is found, it will be treated as misconduct and may amount to gross misconduct, leading to dismissal. Where the conduct is by a third party, the Company will take appropriate action, which may include raising the matter with the client or supplier concerned or ending the relationship.

8. Protection and support

No one will be victimised or suffer any detriment for raising a concern in good faith or for taking part in an investigation. Anyone who victimises another person will be subject to disciplinary action. Making an allegation that is knowingly false is also a disciplinary matter.

Support is available from the Managing Director and from external organisations such as ACAS (www.acas.org.uk, 0300 123 1100).

9. Records and confidentiality

Concerns, investigations and outcomes are recorded in the Company's Central HR Registers, which record a nil position for any period in which no cases arise. Information is held securely and processed in line with the Employee Privacy Notice and data protection legislation, and is shared only with those who need it to deal with the matter.

10. Review

This Policy, and the risk assessment that supports it, are reviewed at least annually and whenever there is a relevant change in the law or a case shows that changes are needed.

11. References

- Code of Ethics and Conduct
- Diversity and Inclusion Policy
- Whistleblowing Procedure
- Employee Handbook (Harassment and Bullying, Grievance and Disciplinary sections)
- Employee Privacy Notice
- Equality Act 2010