

Bullying Policy

Reviewed September 2025

Date of next review September 2026

DEFINITION

The Company: Refers to Network Group Holdings Plc and all of its subsidiary and associated companies.

POLICY

The Company is committed to creating a work environment free of harassment and bullying where all staff are treated with dignity and respect.

Bullying and harassment is morally, legally, and professionally unacceptable. It can have very serious consequences for individuals and the Company. Effects can include loss of morale, poor work performance, increased absence and increased turnover of staff.

The Company deplores all forms of harassment or bullying.

It should be noted that bullying and harassment are not determined by the intention of the person who has caused the offence, but by the effect it has on the recipient. It is up to that person to raise concerns if they find the behaviour unacceptable. It may come from one person, from a group of people, or from others trying to influence an individual to join forces.

The following procedure informs employees of the type of behaviour that is unacceptable and provides employees who are the victims of bullying or harassment with a means of redress.

This policy covers bullying and harassment in the workplace and in any work-related setting outside and applies to all employees of the Company.

PROCEDURE

Bullying and harassment at work is unlawful and both the Company and the harasser may be held liable for such unlawful actions and be required to pay compensation or damages to the claimant. Bullying and harassment reduces the reputation of the Company and the Company's efficiency by creating an intimidating environment and will not be tolerated.

The following procedures aim to resolve complaints of bullying and harassment carefully and sensitively by: -

- Clarifying how complaints should be made and resolved
- Ensuring that complaints are dealt with promptly, fairly and consistently
- Protecting the rights of both the complainant and the alleged bully/harasser

Options

Employees who believe they are being bullied or harassed may take personal action (as detailed below), informal action or formal action.

Personal Action

In many cases of harassment or bullying, talking directly to the harasser in the early stages about the problem may be enough. This may be more appropriate where the person complaining believes that the unwarranted behaviour is unintentional, and the perpetrator is unaware of its impact.

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Informal Procedure

Informal action is designed to assist both the parties settle their differences. However, if the person complaining wishes to take formal action, or the incident is of a serious nature, then an informal approach should not be taken. If the employee has already approached the perpetrator personally, and this has failed, or is inappropriate, then informal action by the relevant Manager may be more effective.

Where the harasser is the employee's Manager, then the employee should raise the issue with the Director or with the HR Advisor. Informal action provides an opportunity for help to be provided as a quick and effective solution. It keeps embarrassment and the risk of confidentiality breaches to a minimum, and minimises the disruption at work.

It is the relevant Manager's/Director's responsibility to discuss the issue with the complainant, and following that meeting, speak to the alleged harasser/bully in an attempt to resolve the issue. These meetings are informal and confidential and should explore;

- How the person is feeling as a result of the harasser's behaviour
- The harasser's account of the situation
- How the behaviour may be contrary to the harassment and bullying policy
- The likely consequences of continuing the behaviour

How the situation will continue to be monitored and over what timescale

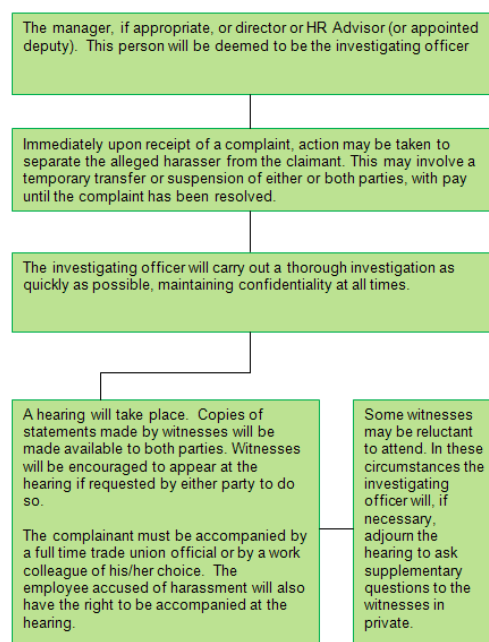
It is the responsibility of the person conducting the investigation (investigating officer) to make notes of the discussions. If the allegations prove to be founded, then notes, together with the identified outcome or action plan should be placed on the files of all parties. Copies of the notes should be made available to each party should they require them.

The investigating officer should provide feedback from the meeting to the person making the complaint. If necessary, they may offer the opportunity to facilitate a joint meeting with both parties, to assist in re-establishing the working relationship.

Formal Procedure

If, due to the nature or seriousness of the allegations, the personal or informal stage is not appropriate, the complainant may want the issue dealt with formally.

Any formal complaint must be made in writing, confirming the dates and details of the incidents and any approaches made to the harasser/bully to stop. The complaint must be raised in confidence to:



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NOTE

All employees involved in the investigation are expected to respect the need for confidentiality. Failure to do so will be considered a disciplinary offence and dealt with in accordance with the Disciplinary Procedure.

The result of the hearing will be confirmed in writing to both parties within 5 days of the hearing. If a claimant is not satisfied about the way a complaint has been handled he/she may ask for it to be reconsidered by the Managing Director. A request for reconsideration of the complaint should be made within 5 working days of receipt of the written report/conclusion.

Where the investigating officer concludes that harassment has taken place he/she will ensure that the harasser has every opportunity to explain his/her actions in accordance with the Company's Disciplinary Procedure.

The severity of the penalty imposed will be consistent with those given in the Company's Disciplinary Procedure. Where action short of dismissal is taken, measures will be taken to ensure that the claimant is able to continue working without embarrassment or anxiety.

This may involve the harasser being transferred to a different work area or changes being made to work practices to minimise contact between the two employees.

If the claimant wishes he/she may also transfer, subject to practical limitations.

The complaint will be considered by a person unconnected with the original investigation who will send his/her decision in writing to both parties. The decision will be final. An employee who receives a warning or is dismissed for bullying or harassment may appeal against the disciplinary penalty imposed in accordance with the Company's Disciplinary Procedure.

An employee who brings a complaint of harassment will not be victimised for having done so. However, if the complaint is untrue and has been brought in bad faith, disciplinary action may be taken against the complainant.

Bullying

Bullying is the misuse of power or position that is considered intimidating, offensive, insulting or malicious and which undermines a person's ability, confidence or self esteem leaving them feeling hurt, angry or powerless.

This list below is not exhaustive. The actions listed below must be viewed in terms of the effect they have on the individual. It is the perception of the recipient that determines whether any action or statement can be viewed as bullying and can be physical, verbal, written or via the email system.

- Derogatory remarks;
- Insensitive jokes or pranks;
- Insulting or aggressive behaviour;
- Verbal, written or physical threats;
- Ignoring or excluding an individual;
- Setting unrealistic deadlines;
- Public criticism;
- Persistent, unjustified criticism;
- Persistent negative criticism;
- Substituting responsible tasks with menial or trivial ones;
- Setting unattainable targets;
- Belittling someone's opinion;
- Withholding necessary information;
- Constantly undervaluing efforts.

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Harassment

Harassment takes many forms, from banter to physical violence. It is recognised that employees might not always realise that their behaviour might constitute harassment but they must understand that what is acceptable to one person is not acceptable to another. Harassment is any conduct based amongst others, on age, disability, sex, sexual orientation, gender reassignment, ethnic origin, nationality, race, colour, religion or belief, which is felt by the recipient, to be unwanted, offensive or which affects their dignity at work. Examples include those listed below (this list is not exhaustive) and can be in written or physical form, delivered verbally or via the e-mail system:-

- Single serious incident;
- Persistent incidents;
- Insensitive jokes and pranks;
- Lewd comments about appearance;
- Unnecessary body contact;
- Physical conduct ranging from unwelcome touching to serious assault;
- Written abuse (whether on paper or other communication systems);
- Displays of offensive material e.g. pin-ups;
- Requests for sexual favours or unwelcome sexual advances;
- Speculation about a person's private life and personal activities;
- Threatened or actual violence;
- Pressure to participate in political/religious groups;
- Threats of dismissal, loss of promotion etc. for refusal of sexual favours.

All bullying or harassment is misconduct and is a disciplinary offence which will be dealt with under the Company's disciplinary process. Bullying or harassment will often be gross misconduct which can lead to dismissal without notice.

The Company expects that all Managers and supervisors should ensure that this policy and procedure is adhered to at all times.

The Company recognises the sensitive nature of complaints of bullying and/or harassment. Employees who wish to discuss such complaints in confidence should contact the HR Advisor or nominated deputies.