

Aims and objectives.

Our objective is to have a workplace which is free from harassment and bullying and to ensure that all employees are treated with dignity and respect.

It is the responsibility of all employees to comply with this procedure and the responsibility of supervisors and managers to ensure it is carried out, with a view to developing and maintaining a working environment in which harassment and bullying are understood by all to be unacceptable.

The company's position on bullying, harassment and victimisation

We believe that a culture of equality, diversity and inclusion is vital to supporting the wellbeing of our people and we are committed to providing a safe and respectful workplace for all members of our staff. Accordingly, we will not tolerate any bullying or harassment of any kind: whether at work (on or away from our premises), during any situation related to work (including on business trips, at social functions or on social media), or against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role. Any such conduct will be treated as a disciplinary offence, which may in appropriate circumstances lead to dismissal.

In addition, we will not tolerate any retaliation against, or victimisation of, any person who has been involved in bringing a complaint of harassment or bullying. Retaliation against or victimisation of a person who has made a complaint of bullying or harassment will constitute a disciplinary offence, which may in appropriate circumstances lead to dismissal.

We will take proactive steps to prevent all forms of harassment and bullying of our people, including by third parties (for example our customers, self-employed contractors, suppliers, or visitors to our premises). Non-exhaustive examples of measures we are committed to taking include:

- Ensuring that all of new starters attend training on equality, diversity and inclusion issues, including anti-harassment and anti-bullying training, as part of their induction process
- Requiring all employees to attend training on equality, diversity and inclusion issues, including anti-harassment anti-bullying training
- Providing focused training for line managers so that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace
- Monitoring our organisational culture via measures such as exit interviews and return-to-work interviews. We will take active steps to address any issues that are identified as part of our process of ongoing monitoring and review
- Ensuring that our zero-tolerance approach to all forms of bullying and harassment is effectively communicated, including to relevant third parties.

There is no justifiable reason to bully or harass someone else. We will take appropriate action in relation to any allegations of harassment or bullying, including by third parties.

We will treat all allegations seriously, irrespective of the seniority of the alleged perpetrator, whether the conduct is a one-off act or a repeated course of conduct, and whether it appears the conduct was undertaken deliberately or not.

Dignity at Work – Bullying & Harassment Policy

If you are a victim of or witness to bullying or harassment, we encourage you to report it without delay in accordance with this policy. This will enable us to take appropriate action and provide support.

We will investigate any allegations in a timely manner, sensitively and, as far as possible, confidentially. Where, following investigation, the evidence indicates that this policy has been breached, we will usually take action under our disciplinary procedure (which could result in a disciplinary sanction up to and including dismissal).

You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be personally liable to compensate the victim. In some circumstances the treatment may also amount to a crime punishable by a fine or imprisonment.

False accusations of harassment or bullying can have a serious effect on innocent individuals. Accordingly, false allegations or actions which are made in bad faith will be dealt with under our disciplinary procedure. Individuals who make allegations of bullying or harassment in good faith will not be treated less favourably as a result.

Senior management of Ductile Castings Ltd are fully committed to this policy and give it their full support.

Further details about our commitment to supporting an inclusive culture are also available in our Equal Opportunities Policy.

Who this policy applies to

This policy applies to all employees, workers, agency workers, contractors, apprentices, job applicants and volunteers.

It applies to bullying or harassment by members of our staff as well as third parties and covers all areas of the business.

Responsibility for this policy

The board of directors has overall responsibility for this policy but has delegated responsibility for managing its implementation to the HR Manager. Any suggestions for change should be reported to the HR Manager.

Day-to-day responsibility for the operation of the policy sits with the HR department, line managers and supervisors. If you have any questions about this policy, you should direct them to HR, your line manager or supervisor in the first instance.

It is the responsibility of employees to comply with this Policy and the responsibility of supervisors and managers to ensure it is carried out, leading by example and conducting themselves in accordance with this policy and ensuring that those they manage do the same. Supervisors and managers should ensure that staff understand the standards of behaviour expected of them under this policy and take action when any behaviour falls below the required standards. A copy of this Policy is provided to all employees, including new employees during the induction procedure, who are expected to familiarise themselves with it and abide by its provisions.

What type of treatment amounts to harassment?

“Harassment” is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Harassment may involve conduct of a sexual nature (please refer to the Company Sexual Harassment policy), or it may be related to another protected characteristic such as 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. Our stance is that harassment is unacceptable even if it does not fall within any of these categories.

Harassment also includes situations where someone is treated less favourably because they have submitted to or refused to submit to harassing behaviour in the past.

Harassment can take many forms. Non-exhaustive examples of harassment include:

- Verbal abuse, “banter”, offensive comments, jokes, taunts or pranks, whether or not related to a protected characteristic;
- Unwanted physical conduct, intimidation or “horseplay” (such as touching, pinching, grabbing, hitting, pushing, or jostling);
- Sending or displaying material by any means that some people may find offensive, pornographic, inflammatory, abusive, or that some people might find offensive (including “pin-ups”, graffiti, emails, text messages, video clips and/or images sent electronically or posted online);
- Offensive emails, text messages or social media content;
- Disclosing or threatening to disclose someone’s sexual orientation or transgender status;
- Gossip and speculation about someone’s sexual orientation or transgender status, including spreading malicious rumours;
- Disrespecting a person’s gender identity, name and pronouns. This may include ‘misgendering’ a person (i.e. deliberately or repeatedly referring to the person using a pronoun that does not correctly reflect the gender with which they identify), or using a trans person’s ‘dead name’ (i.e. the trans person’s name before they transitioned);
- Excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.
- Suggestions or threats by management or supervision that racial origins could affect someone’s job security or prospects.

*Please refer to the Company Sexual Harassment Policy for specific examples of behaviour that amounts to sexual harassment.

A single incident can amount to harassment. It is the impact of the conduct and not the intent of the action that determines whether harassment has taken place.

A person may be harassed even if they were not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

What type of treatment amounts to bullying?

There is no legal definition of bullying. However, we regard “bullying” to be behaviour (aimed at an individual or group of individuals) which creates a threatening, intimidating or humiliating environment that undermines the confidence and self-esteem of the recipient. In some cases, the bully misuses the power they hold from being in a position of authority; other times the power may be the bully’s personal strength or the power to coerce through fear or intimidation.

Bullying conduct may be physical, verbal and/or non-verbal. Non-exhaustive examples of bullying include:

- Physical or psychological threats
- Verbal abuse, such as shouting or swearing at colleagues
- Rifling through, hiding, or damaging personal property
- Practical jokes, initiation ceremonies, or inappropriate birthday rituals
- Supervision which is overbearing or intimidating
- Deliberate exclusion from work activities or conversations at work
- Making inappropriate derogatory remarks about someone’s performance in front of others
- Withholding information, a person needs in order to do their job
- Cyberbullying, i.e. using information and communications technology (particularly mobile phones, the internet and social media) to upset or humiliate someone.

The following do not, of themselves, amount to bullying:

- Appropriate criticism of an employee’s behaviour
- Proper performance management
- Reasonable instructions given to staff in the course of their employment

If the bullying relates to a person's protected characteristic, it may also constitute harassment and as such will be unlawful.

It is important to recognise that conduct which one person may find acceptable, another may find unacceptable. We expect all staff to be treated with due respect and appropriate sensitivity.

What type of treatment amounts to victimisation?

Non-exhaustive examples of victimisation include:

- Denying someone an opportunity because they have made (or because you suspect that they intend to make) a complaint about harassment
- Failing to promote someone because they accompanied another staff member to a grievance meeting
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing

Responsibility of employees, supervisors and managers

It is the responsibility of employees to comply with this Policy and the responsibility of supervisors and managers to ensure it is carried out, with a view to developing and maintaining a working environment at Ductile Castings Ltd in which harassment and bullying are understood by all to be unacceptable. To this end, a copy of this Policy is provided to all employees, including new employees during the induction procedure, who are expected to familiarise themselves with it and abide by its provisions.

It is expected that all employees will act responsibly regarding this issue. False accusations of harassment or bullying can have a serious effect on innocent individuals. Therefore, should investigation show that a false accusation has been made in bad faith, appropriate disciplinary action, which could include dismissal, will follow. However, an employee who brings a complaint in good faith will not be subject to any detriment by Ductile Castings Ltd.

What should you do if you are being bullied, harassed or victimised?**If you are being bullied or harassed by a colleague: informal resolution**

If you are being harassed or bullied by another member of staff, you may wish to start by trying to resolve the issue informally.

You may be able to resolve the situation yourself by explaining clearly to the perpetrator(s) that their behaviour is not welcome or makes you uncomfortable, that you consider it to be contrary to our policy and that it must stop.

Alternatively, you could speak with your manager or another colleague to seek guidance on how best to resolve the issue.

If the above approach does not work or if you do not want to try to resolve the situation in this way, or if you are being bullied by your own manager, you should raise the issue with the HR Manager. They may try to resolve the situation informally by telling the alleged perpetrator(s), without prejudging the matter, that: there has been a complaint that their behaviour is having an adverse effect on a fellow employee; such behaviour is contrary to our policy; and the continuation of such behaviour could amount to a serious disciplinary offence. It may be possible for the HR Manager to have this conversation with the alleged perpetrator without revealing your name, if this is what you want. They will also stress that the conversation is confidential.

In certain circumstances we may be able to involve a neutral third party (a mediator) to facilitate a resolution of the problem. The HR Manager will discuss this with you if it is appropriate.

If your complaint is resolved informally, the alleged perpetrator(s) will not generally be subject to any disciplinary sanction. However, in exceptional circumstances (such as where your concern involves a serious allegation of sexual harassment, or in cases where the behaviour has occurred before) we may decide to investigate further and take more formal action notwithstanding that you raised the matter informally. We will consult with you before taking this step.

If you are being bullied or harassed by a colleague: Formal complaint procedure

If informal resolution is inappropriate or unsuccessful, you should make a formal written complaint about the harassment or bullying to the HR Manager. If the matter concerns that person, you should refer it to the Managing Director. A formal complaint may ultimately lead to disciplinary action against the perpetrator(s).

Your formal written complaint should include the following details: the name of the alleged perpetrator(s); the nature of the harassment or bullying; the dates and times the harassment or bullying occurred; the names of any witnesses; and any action taken by you to resolve the matter informally.

If you wish to make a formal complaint about victimisation, you should submit it in writing to the HR Manager. If the matter concerns that person, you should refer it to the Managing Director. Your written complaint should include the following details: the name of the person or persons you believe have victimised you; the reason you believe you have been victimised; the nature of the victimisation; the dates and times at which it occurred; the names of any witnesses; and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

You will be invited to a meeting to consider your complaint and to discuss any suggestions you have for how it may be resolved. The meeting will normally be held within five working days of your formal complaint being raised. At the meeting, you may be accompanied by a work colleague or a trade union official, who must also respect the confidential nature of the meeting.

We will then conduct an investigation into your complaint. The investigation will be carried out by someone with appropriate experience and no prior involvement in the complaint. It may be necessary to interview witnesses as part of the investigation. If so, we will stress to them the importance of confidentiality.

The alleged perpetrator(s) will normally need to be told your name and the details of your complaint in order for the issue to be investigated properly. However, we will carry out the investigation as promptly, confidentially and sensitively as possible.

Where you and the alleged perpetrator(s) work in proximity to each other, we may consider it inappropriate for you to continue to do so while the complaint is being investigated and during any consequent disciplinary proceedings. This may necessitate that one or both parties be suspended on full pay or transferred to an alternative role on a temporary basis.

After the investigation, we will meet with you to consider the complaint and the findings of the investigation. At the meeting, you may be accompanied by a fellow worker or a trade union official, who must also respect the confidential nature of the meeting.

After the meeting, we will write to you to inform you of our decision and to notify you of your right to appeal to a more senior manager if you are dissatisfied with the outcome.

If you wish to appeal, you should put your appeal in writing explaining the reasons why you are dissatisfied with our decision. If you submit an appeal, you will normally be invited to attend a meeting to consider it. Where practicable, the appeal meeting will be conducted by a manager who has not been previously involved in the case and is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. You have the right to bring a colleague or trade union representative to the meeting. We will write to you after any appeal meeting to confirm our final decision. Following this stage, there will be no further right of appeal.

Where the alleged perpetrator is an employee and the evidence gathered in the investigation indicates that a disciplinary offence has been committed, our disciplinary procedure will usually be instigated and a disciplinary hearing under that procedure will be arranged to deal with the alleged disciplinary offence. In accordance with that procedure, the alleged perpetrator will be provided with relevant evidence about the allegations against them and will be given a full opportunity to respond.

Where the investigation indicates that a disciplinary offence has been committed, aggravating factors, such as abuse of power over a more junior colleague, will be taken into account in deciding what disciplinary action to take.

Alternatives to disciplinary action may be considered in some instances. Where the investigation indicates that no disciplinary offence has been committed, both you and the alleged perpetrator will be informed in writing.

Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the individual concerned (for example, we will consider whether mediation and/or counselling, or a change of duties, working location or reporting lines would be appropriate in the circumstances).

We retain the discretion to choose whether to hold meetings in person or remotely, as appropriate, depending on the circumstances. If a meeting is to be held remotely:

- we will ensure that all participants (including, if applicable, any permitted person that you choose as a companion) can access the necessary technology and materials
- we ask you to inform us if you have a disability or other accessibility issue that could affect your ability to use video conferencing technology so that we can consider any reasonable adjustments
- you must not have anyone else in the room with you during the meeting (other than your permitted chosen companion, if applicable, if they are attending from the same physical location as you)

If you are being bullied or harassed by a third party (such as a customer, supplier or visitor to our premises)

If you are being bullied or harassed by a third party, such as a customer, supplier, or visitor to our premises (or when visiting a customer or supplier's premises or other location in the course of your employment), please raise this with your immediate manager without delay. We will then decide how best to deal with the situation, in consultation with you. We will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in

mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party. We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser or bully.

Third-party harassment can result in legal liability and will not be tolerated. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy.

If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with the Castings group if appropriate.

Any harassment by a member of staff against a third party may lead to disciplinary action up to and including dismissal.

If you witness bullying or harassment

Staff who witness bullying or harassment are encouraged to take appropriate steps to address it. Depending on the circumstances, appropriate steps could include intervening where you feel able to do so; supporting the victim to report the incident; reporting the incident on the individual's behalf; and/or co-operating with any investigation. All witnesses will be provided with appropriate support and will be protected from victimisation.

Your rights and responsibilities

- You have the right not to experience bullying, harassment and victimisation at work and to be treated with dignity and respect.
- You have a responsibility to comply with this policy and to help us to implement it.
- You have a duty not to bully, harass or victimise anyone at work (including third parties with whom you come into contact at work) and not to help anyone else do so.
- You also have a duty to treat others with dignity and respect.

How can we all help prevent bullying and harassment?

We all have a shared responsibility to help create and maintain an environment free from bullying and harassment. You can do this by:

- Considering how your own behaviour may affect others, and amending it accordingly
- Being receptive, rather than defensive, if asked to modify your behaviour
- Treating your colleagues with dignity and respect
- Taking a stand if you think inappropriate comments, jokes or behaviour is occurring
- Making it clear to others if you find their behaviour unacceptable
- Intervening, if possible, to stop bullying and harassment and giving support to others
- Reporting bullying and harassment or potential bullying and harassment in the appropriate manner to either your line manager, or HR.

Risk assessments and ongoing monitoring

We will monitor the treatment and outcomes of any complaints of harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved, and workforce training is targeted where needed.

Confidentiality, data protection and record keeping

We aim to deal with complaints of bullying and harassment sensitively and with due respect for the privacy of the individuals involved. All employees must treat as confidential any information communicated to them in connection with a complaint under this procedure. Details of any investigation and the names of the person making the complaint, and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action.

Conducting investigations and formal meetings under this procedure involves us processing the personal data of the employees concerned. We use this personal data in order to investigate and deal with complaints of bullying and harassment. Our legal grounds for doing so are that it is necessary:

- to comply with our legal obligations (e.g. to investigate and deal with bullying and harassment complaints in accordance with our duty of trust and confidence to our employees; to ensure a safe working environment under health and safety laws)
- for the performance of the employment contract (i.e. to investigate and deal with bullying and harassment complaints in accordance with our duty of trust and confidence to our employees)
- in our legitimate interest to deal effectively with bullying and harassment complaints, whether you are the subject of them or are otherwise connected to the issues raised.

Special category data¹ and data relating to criminal convictions or offences may occasionally need to be processed under this procedure – for example, where an employee asserts that they are being bullied or harassed because of their race or sexual orientation, or where an employee requires a reasonable adjustment to the procedure to accommodate a disability. Our additional legal grounds for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; and to establish, exercise or defend legal claims.

Where we take witness statements from employees with information about the complaint being investigated under this procedure, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the process. This will ordinarily be: HR; the person/people conducting investigations; and the managers conducting any formal meeting or appeal. In addition, if in the course of the procedure it becomes apparent that misconduct has taken place which requires investigation under our disciplinary policy, witness statements taken under this procedure may be used in any subsequent disciplinary procedure and may therefore be shared with the person/people conducting investigations and hearings, as well as the employee whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

¹ i.e. personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sex life or sexual orientation, biometric data that is used to identify an individual, or genetic data

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We will keep records of complaints dealt with under this procedure in accordance with the criteria set out in our main employee privacy notice.

More general information, including details of who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, is contained in our main employee privacy notice, which can be accessed via <https://castings.plc.uk/corporate-governance/corporate-responsibility/gdpr/> or a copy can be obtained from the HR department.

Further support

We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset and we will do what we can to provide appropriate support.

Support and guidance can also be obtained from the following external services:

- The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
- Protect (www.protect-advice.org.uk).
- Victim Support (www.victimsupport.org.uk).
- Rape crisis (www.rapecrisis.org.uk).
- Rights of women (England and Wales) (www.rightsofwomen.org.uk).

Review

We will review this policy at regular intervals or as the need arises. We will monitor its effectiveness and implement any changes that may be required.

Status of this policy

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes

Signed on behalf of Ductile Castings Ltd:

DATE:



27/8/2025