



ANTI BULLYING & HARASSMENT POLICY

Version 4 – October 2026

INTRODUCTION

The Anti-Harassment and Bullying policy covers bullying including sexual harassment across all Kew Green properties.

APPLICABILITY / SCOPE

This policy applies to anyone working for us across the Kew Green estate, including owned and managed properties, unless otherwise informed by the People Team. This includes employees, workers, contractors, agency personnel, volunteers, interns and apprentices. It also applies to job applicants and is relevant at all stages of the employment relationship. The policy covers bullying and harassment by colleagues and by third parties encountered through work, including clients, customers, guests, service users, suppliers, contractors, visitors and members of the public, whether the conduct takes place in person, online or through any other work-related communication.

This policy is not contractual, and the Company reserves the right to change it at any time.

GENERAL POLICY STATEMENT

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

This policy covers bullying harassment and sexual harassment of and by managers, employees, contractors, agency personnel and anyone else engaged to work at any Kew Green operated location whether by direct contract with the company or otherwise. If the complainant or alleged harasser is not employed by the Company, for example, if the worker's contract is with an agency, this policy will apply with any necessary modifications such as that Kew Green could not dismiss the worker but would instead require the agency to remove the worker, if appropriate, after investigation and disciplinary proceedings.

The policy covers bullying harassment and sexual harassment in the workplace and in any work-related setting outside the workplace, for example, business trips and work-related social events.

This policy also takes into consideration our duties under the Human Rights Act 1998.

POLICY TERMS

Key to protecting our culture and our people is seeking to eradicate bullying or harassment at work. This policy supports this aim by setting out the steps we will take to investigate and deal with complaints of bullying or any kind of harassment, and how we support those affected.

In accordance with the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025, the Company is committed to taking all reasonable steps to prevent sexual harassment in the course of employment. From 30 October 2026, this is a proactive duty requiring the Company to take every preventative step that is reasonable in light of its size, resources, sector, workforce and identified risks, rather than relying only on action after an incident has occurred.

The Company must also take all reasonable steps to prevent employees from being harassed by third parties in the course of their employment. This protection applies to sexual harassment and harassment related to the protected characteristics covered by the harassment provisions of the Equality Act 2010. The Company may be liable where a third party harasses an

employee and the Company failed to take all reasonable steps to prevent it. Action may therefore be taken even where there has been no previous complaint or repeated incident.

Harassment and bullying, including sexual harassment, can have very serious consequences for individuals and for the Company. Severe cases of harassment and bullying can even lead to mental illness and suicide. Effects on the Company can include loss of morale, poor work performance, increased turnover of employees, legal claims, and damage to the Company's reputation. If an accusation of any kind of harassment or bullying is found to be true, an employee may face disciplinary penalties, up to and including dismissal, could be personally liable to pay compensation in legal claims, and may find their own family and social relationships are adversely affected. Serious harassment including sexual harassment may be a criminal offence.

The Company will not tolerate bullying or harassment of any kind. All allegations of bullying and harassment will be investigated and if appropriate, disciplinary action will be taken. The Company will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

DEFINITIONS

Bullying is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate, or injure the person on the receiving end.

Harassment is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct.

Victimisation is subjecting a person to a detriment because they have, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing them or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Sexual Harassment

Sexual harassment is unwanted behaviour of a sexual nature. It is attention that violates a person's dignity or creates an offensive, intimidating, humiliating or degrading environment. Sexual harassment makes the person, or persons, affected feel uncomfortable, threatened or offended. It is the effect that matters regardless of whether the effect was intended.

OUR COMMITMENT

We will deliver regular training sessions for all employees to ensure a comprehensive understanding of what sexual harassment is and everyone's role in preventing and addressing it.

We will also ensure that additional training, education and guidance is given to all line managers to give them the confidence to tackle sexual harassment.

We will carry out and regularly review documented risk assessments to identify where sexual harassment or third-party harassment may arise, including risks associated with guest and customer contact, lone working, night work, alcohol, work-related social events, online communications, conferences, suppliers and contractors. We will implement all preventative measures that are reasonable for the identified risks, monitor their effectiveness and retain records of the steps taken and the reasons for any measure assessed as not reasonable.

Preventative measures may include clear standards communicated to employees and third parties; appropriate staffing, supervision and security arrangements; safe systems for lone and late working; incident recording and trend analysis; suitable reporting routes; staff and manager training; de-escalation guidance; appropriate warnings, restrictions or removal of third parties; and relevant provisions in guest booking terms, customer communications and supplier or contractor arrangements. Measures will be tailored to the circumstances of each property and reviewed following incidents, complaints or material changes in risk.

We will follow a clear, fair and supportive procedure to encourage the reporting of potential or alleged sexual harassment in the course of employment.

LEADING BY EXAMPLE:

Senior leaders and line managers must foster a culture built on mutual respect, where all employees feel safe to share their views and raise concerns. Kew Green expects leaders and line managers to act as role models by consistently demonstrating respectful and inclusive behaviour. This includes being aware of how their own status and actions may impact on others.

In addition to self-awareness, we expect and encourage leaders and line managers to regularly seek and act on feedback from their teams and peers regarding an inclusive culture actively engaged in preventing sexual harassment.

Preventing sexual harassment requires leaders and line managers to communicate that any form of unfair treatment such as sexual harassment will not be tolerated and is unlawful. Offensive behaviour can sometimes be excused as banter or jokes, so leaders and line managers must maintain high standards.

Training, education and guidance is given to all line managers to ensure they have the confidence and capability to be proactive and deal with unacceptable behaviour at the earliest possible stage.

As a leader or line manager, you are also well placed to pick up on any underlying tensions that could indicate potentially inappropriate behaviours or attitudes. This may include employees being unwilling or reluctant to work together, heated exchanges or perceived favouritism.

BULLYING

Whilst there is no legal definition of bullying, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. Bullying may occur at work or outside work.

HARASSMENT

Conduct may be harassment whether the person behaving in that way intends to offend. Something intended as a "joke" may offend another person. Different people find different things acceptable. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others.

Behaviour which any reasonable person would realise would be likely to offend will be harassment without the recipient having to make it clear in advance that behaviour of that type is not acceptable to them, for example, sexual touching. It may not be so clear in advance that some other forms of behaviour would be unwelcome to, or could offend, a particular person, for example, certain "banter", flirting or asking someone for a private drink after work. In these cases, first-time conduct which unintentionally causes offence will not be harassment, but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them.

Harassment may also occur where a person engages in unwanted conduct towards another because they perceive that the recipient has a protected characteristic (for example, a perception that someone is gay or disabled), when the recipient does not, in fact, have that protected characteristic, for example, it would be harassment for an individual to tease repeatedly an individual because of an incorrect belief that that the recipient is deaf. Similarly, harassment could take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated, for example, if their child is disabled, wife is pregnant, or friend is a devout Christian.

Harassment may occur where an employee is subjected to unwanted conduct by a third party, including a client, customer, guest, service user, supplier, contractor, visitor or member of the public. Third-party harassment may take place in person, online or through any work-related communication and may relate to any protected characteristic covered by the harassment provisions of the Equality Act 2010, as well as sexual harassment. Employees should report any incident or concern to their line manager, another manager or the People Team as soon as possible. The Company will take the report seriously, consider immediate protective measures, record and investigate the circumstances, and take appropriate steps to prevent recurrence. Depending on the circumstances, action may include warning the third party, ending or restricting contact, removing them from the premises, changing service arrangements, escalating the matter to their organisation, ending a commercial relationship or reporting conduct to the police. Employees will not be expected to tolerate harassment as part of their role. A single incident can amount to harassment if it is sufficiently serious.

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age. Serious bullying or harassment may amount to other civil or criminal offences, for

example, a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.

EXAMPLES OF BULLYING, HARASSMENT AND SEXUAL HARASSMENT

Bullying, harassment and sexual harassment may be misconduct that is physical, verbal, or non-verbal, for example, by letter or email. Examples of unacceptable behaviour that are covered by this policy include (but are not limited to):

- physical conduct ranging from unwelcome touching to serious assault.
- unwelcome sexual advances.
- the offer of rewards for going along with sexual advances, for example, promotion, access to training.
- threats for rejecting sexual advances, for example, suggestions that refusing advances will adversely affect the employee's employment, evaluation, pay, advancement, assigned work, or any other condition of employment or career development.
- demeaning comments about a person's appearance.
- unwelcome jokes or comments of a sexual or racial nature or about an individual's age, disability, sexual orientation, or religion.
- questions about a person's sex life.
- unwanted nicknames related to a person's age, race, or disability.
- the use of obscene gestures.
- excluding an individual because they are associated or connected with someone with a protected characteristic, for example, their child is gay, spouse is black, or parent is disabled.
- ignoring an individual because they are perceived to have a protected characteristic when they do not, in fact, have the protected characteristic, for example, an employee is thought to be Jewish, or is perceived to be a transsexual.
- the open display of pictures or objects with sexual or racial overtones, even if not directed at any person, for example, magazines, calendars, or pin-ups.
- spreading malicious rumours or insulting someone.
- picking on someone or setting them up to fail.
- making threats or comments about someone's job security without good reason.
- ridiculing someone.
- isolation or non-cooperation at work; and
- excluding someone from social activities.
- sexual images displayed or shared.
- offensive words or comments.
- demeaning or humiliating behaviour or language.
- references to someone's body.
- intrusive questions about someone's private life.
- stalking, including online stalking.
- sexual gestures, such as simulating sexual acts.
- unwanted touching, such as putting hand on someone's knee or hugging them.
- unwanted sexual attention whether verbal or physical.
- coercing someone into sexual relations through pressure, manipulation or threats, or offering rewards in exchange for sex.
- sexual violence, including rape, or threatening to carry out sexual violence or unwanted sexual acts.

REPORTING

Employees are encouraged to report bullying, harassment, sexual harassment or third-party harassment as soon as possible, whether they experience it directly, witness it or become aware of a risk. A concern may be raised with the employee's line manager, any other manager or the People Team. Employees do not have to confront the person involved before making a report, and a verbal report will be accepted and recorded where the employee does not initially feel able to submit a written complaint.

The written complaint should set out full details of the conduct in question, including the name of the harasser, the nature of the bullying, harassment or sexual harassment, the date(s) and time(s) 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.

Employees can also report concerns anonymously through Kew Green's anonymous reporting line, Kewmunicate. Reports submitted through Kewmunicate will be sent directly to the People Team for appropriate review and action.

PROCEDURE

Informal

The employee may be able to sort out matters informally as the person may not know that their behaviour is unwelcome or upsetting. An informal discussion may help to understand the effects of their behaviour and agree to change it. The employee may feel able to approach the person their self, or with the help of the line manager, or another employee. Alternatively, an initial approach could be made on the employee's behalf by one of these people. They should be informed what behaviour is found to be offensive and unwelcome and inform them that the employee would like it to stop with immediate effect. The accused employee will need to be informed that if the behaviour continues the employee may intend to make a formal complaint to their line manager.

A record of the date and what was said and done should be kept. This will be useful evidence if the unacceptable behaviour continues, and they wish to make a formal complaint. However, if this is not appropriate employees should report the matter by writing directly or to the People Team.

Formal

If an informal approach does not resolve matters, or the employee thinks the situation is too serious to be dealt with informally, they can make a formal complaint by using the Company's grievance procedure. In the case of grievances about bullying, harassment, or sexual harassment, the normal grievance procedure is modified so that they can choose whether to raise the grievance with the line manager or directly with the People Team. The company will ensure that they can bring the complaint in the first instance to someone of their own sex if they so choose.

All complaints will be investigated promptly, in a confidential and sensitive manner and, if appropriate, disciplinary proceedings will be brought against the alleged harasser. The employee will have the right to be accompanied by a work employee or trade union representative of choice at any meeting dealing with the grievance. The Employee will be kept informed of the general progress of the process of investigation. The company will decide on

a balance of probabilities, after considering all available evidence, whether harassment of any kind or bullying has occurred.

The company will treat complaints of bullying, harassment and sexual harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure on a "need to know" basis. For example, the identity and the nature of the allegations must be revealed to the person they are complaining about, so they are able to respond to the allegations. Some details may also have to be given to potential witnesses, but the importance of confidentiality will be emphasised to them. If the complaint is upheld, and a person who has been found to have harassed the employee is kept in the company's employment, managers may need to be given some information where this is necessary for them to manage the risk of further harassment by that person against them, or others.

SUPPORT

Wherever possible, the company will try to ensure that the employee and the alleged harasser are not required to work together while the complaint is under investigation. This could involve giving the employee the option of remaining at home on special leave if they wish. In a serious case, the alleged harasser may be suspended while investigations and any disciplinary proceedings are underway.

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

For emotional support, employees can access free, confidential counselling from our EAP who can be contacted on 0333 400 0545 quoting 73085.

If the employee's complaint is upheld, and the person found to have bullied or harassed them remains in the company's employment, every effort will be made to ensure that, if possible, the employee does not have to continue to work alongside the harasser if they do not wish to do so. The Company will discuss the options with the employee. These may include the transfer of the harasser or, if the employee wishes, they may be able to transfer to another post.

If the employee's complaint is not upheld, the People Team will support them, the alleged harasser, and their manager(s) in planning for both parties to continue or resume working and to help repair their working relationships. The company will consider making arrangements to avoid the employee and the alleged harasser having to continue to work alongside each other, if either of them do not wish to do this.

The employee has the right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, making a complaint that is known to be untrue may lead to disciplinary action being taken against them.

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

PREVENTION OF BULLYING AND HARASSMENT

Every employee has a responsibility to help create and maintain a work environment free of bullying, harassment and sexual harassment. You can help to do this by:

- being aware of how your own behaviour may affect others and changing it, if necessary - you can still cause offence even if you are "only joking".
- treating your employees with dignity and respect.
- taking a stand if you think inappropriate jokes or comments are being made.
- making it clear to others when you find their behaviour unacceptable, unless it should be obvious in advance that this would be the case.
- intervening, if possible, to stop harassment or bullying and giving support to recipients.
- making it clear that you find harassment and bullying unacceptable.
- reporting harassment or bullying to your manager or human resources and supporting the company in the investigation of complaints; and
- if a complaint of harassment or bullying is made, not prejudging, or victimising the complainant or alleged harasser.

Managers have a particular responsibility to:

- set a good example through their own behaviour and communicate that harassment by employees or third parties will not be tolerated.
- ensure there is a supportive working environment and that employees know the behavioural standards expected of them.
- identify and escalate risks, participate in property-level risk assessments and ensure agreed preventative controls are implemented.
- intervene promptly and safely where bullying or harassment is observed or reported, including conduct by guests, customers, clients, contractors, suppliers or other third parties.
- consider and implement immediate protective measures for affected employees without treating the employee who raised the concern unfavourably.
- record and report promptly to the People Team any complaint, incident, pattern of behaviour or known risk, even where the affected employee does not wish to make a formal complaint.
- cooperate with investigations, follow-up action and reviews of whether preventative measures remain effective.

HUMAN RIGHTS

Kew Green are committed to ensuring all our employees are treated with dignity and respect, and this covers not just bullying and harassment.

The following list (which is not exhaustive) illustrates our commitment. (They are also referred to in other relevant policies):

- We provide a safe and healthy working environment.
- We support the elimination of discrimination and promote diversity in the workplace.
- We provide fair remuneration.
- We conduct our business with honesty and integrity in compliance with applicable laws.
- We respect our employee's privacy.
- We promote freedom of expression.
- We promote freedom of assembly and association.
- We prohibit torture and inhuman or degrading treatment.

DATA PROTECTION

The Company processes personal data collected in accordance with its data protection policy. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the Company's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Company's disciplinary procedure.