SEXUAL HARASSMENT POLICY

AUGUST 2026

1. OUR COMMITMENT

Everyone deserves to be treated with dignity and respect at work. That means feeling safe, supported, and free from sexual harassment. Sexual harassment is never acceptable, and it's unlawful under the Equality Act 2010.

We have a **zero-tolerance** approach to sexual harassment and are committed to creating a safe and supportive environment for everyone who works with us, including colleagues, agency workers, contractors, volunteers, and visitors.

The law requires employers to take reasonable steps to prevent sexual harassment and, since October 2024, under the Worker Protection (Amendment of Equality Act 2010) Act, we also have a proactive duty to take reasonable steps to **prevent** sexual harassment **before** it occurs. We take that responsibility seriously, with clear procedures in place for reporting concerns.

If you ever experience or witness sexual harassment, we encourage you to speak up so we can act quickly.

Any behaviour that breaches this policy may lead to disciplinary action up to and including termination. We will always take allegations seriously and act decisively.

2. SCOPE

This policy applies both at work and outside the workplace where work-related activities take place, such as business trips, client meetings, social events or work functions. It covers behaviour by colleagues (including consultants, contractors and agency workers), as well as third parties like customers, suppliers or visitors.

For clarity, this policy doesn't form part of your contract of employment, and we may make changes to it if needed.

3. WHAT IS SEXUAL HARASSMENT?

Sexual harassment is unwanted conduct of a sexual nature that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

It also includes treating someone less favourably because they rejected or submitted to such behaviour. Sexual harassment can come from colleagues, managers, contractors, clients, or third parties and it doesn't have to happen in person. Online and social media harassment also counts.

4. EXAMPLES INCLUDE (BUT ARE NOT LIMITED TO):

- sexual comments, jokes, or "banter"
- displaying sexual images, posters, or photos
- suggestive looks, leering, or staring
- sexual advances or propositions
- promises in exchange for sexual favours
- unwelcome touching, hugging, or kissing
- intrusive questions about someone's private life
- spreading sexual rumours
- sending sexual messages, images, or emails; and
- inappropriate content posted online or shared on social media.

This applies regardless of intent. Behaviour may amount to harassment even if the person responsible did not intend to cause offence.

For more information on sexual harassment, please click here ACAS Sexual Harassment

5. WHAT IS VICTIMISATION?

Victimisation means treating someone unfairly because they've made (or are thought to have made) a complaint of discrimination or

harassment or supported someone else's complaint.

6. PROTECTED ACTS INCLUDE:

- making a claim or complaint under the Equality Act 2010
- helping someone else make a claim (e.g. giving evidence)
- alleging that someone has breached the Act
- doing anything else in connection with the Act

7. EXAMPLES OF VICTIMISATION:

- overlooking someone for promotion because they complained of harassment.
- dismissing someone because they supported a colleague in a complaint; and
- excluding someone from meetings after they acted as a witness.

Victimisation may also arise where someone is subjected to detriment after raising concerns informally or in good faith, even if the complaint is not upheld.

8. THIRD-PARTY SEXUAL HARASSMENT

Sexual harassment from customers, suppliers, or other third parties will be taken seriously and addressed in line with our duty to take reasonable steps to prevent such conduct (as clarified by the Worker Protection Act 2024).

- If a customer or supplier harasses any colleague, we will take appropriate action, which could include issuing warnings, banning the person, or sharing information with other depots. Criminal acts will be reported to the police.

Any colleague who sexually harasses third parties will also face disciplinary action, which may include dismissal.

9. WHERE THIS POLICY APPLIES

This policy applies to behaviour that occurs:

- in the workplace
- at work-related events (e.g. business trips, lunches, or social functions)
- outside of work but involving colleagues or others connected with our organisation (including social media)
- outside of work where conduct impacts your suitability for your role
- in hybrid and remote working environments, online meetings, and communications using work or personal devices where linked to work activities

10. WHAT TO DO IF YOU EXPERIENCE SEXUAL HARASSMENT OR VICTIMIZATION

We take all concerns seriously. Every situation is considered individually and in line with our disciplinary policy.

11. INFORMAL PROCESS

If you feel able, you can try addressing the issue directly by telling the colleague their behaviour is unwelcome and that it needs to stop. Sometimes people don't realise the impact of their actions. If that feels too difficult, or if the behaviour continues, please speak to your line manager as they can offer confidential advice and may be able to help resolve matters informally on your behalf.

12. FORMAL PROCESS

If informal steps don't work or aren't appropriate, you can raise the issue formally under our Grievance Policy. The People Services team will ensure any complaint is investigated fairly, promptly, and with confidentiality.

Wherever possible, the investigation will be handled by someone with relevant experience who has had no prior involvement. Only those who need to know will be given information. During the process, we'll consider whether

temporary steps are needed to help manage working relationships between you and the colleague involved.

Once the investigation is complete, the People Services team will communicate the outcome in writing to you, examples of potential outcomes are listed below.

- If the complaint is upheld and involves a colleague, it will be dealt with under our Disciplinary Procedure and may amount to misconduct or gross misconduct.
- If the person responsible is a third party (customer, visitor, supplier etc.), we will decide what action is appropriate.
- Regardless of the outcome, we'll consider how best to support you and manage any ongoing working relationship.

If making a report in line with either the informal or formal process doesn't feel right, or you would like to make a report anonymously, our whistleblowing process is available. Details of how to make a report via the whistleblowing process can be found below.

13. PROTECTION AND SUPPORT

We want you to feel safe speaking up. Any colleague who makes a complaint, or helps with an investigation in good faith, must not be treated badly, victimised, or retaliated against.

If someone does retaliate or victimise a colleague in this way, they will face disciplinary action under our Disciplinary Policy.

We also offer 24/7 access to confidential counselling via our Employee Assistance Programme on **0800 7560861** – quote **'Perkbox'** and **'Watson Fuels'**.

14. RECORD KEEPING

Where a complaint is made, we may keep relevant information on the personnel files of those involved, along with the outcome and any notes or documents created during the process.

15. MANAGER RESPONSIBILITIES

All managers have a critical role in preventing and addressing sexual harassment.

In line with our duty under the Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023, managers are expected to:

- lead by example, always modelling respectful behaviour
- promote an open culture where colleagues feel safe to raise concerns without fear of victimisation
- undertake risk assessments and take other reasonable measures to understand areas and roles which are most at risk of sexual harassment and take all reasonable preventative steps to mitigate those risks.
- take proactive steps to prevent harassment, including monitoring workplace culture, addressing inappropriate behaviour early, and not waiting for a formal complaint
- ensure that all team members complete mandatory training on preventing sexual harassment.
- respond promptly and sensitively to concerns raised, and escalate matters to the People Services team or senior management where appropriate
- keep accurate records of concerns raised, actions taken, and outcomes, while maintaining confidentiality
- support colleagues who raise concerns, including signposting to internal or external support services
- participate in investigations when required and co-operate fully with any internal or external inquiries.

Failure by a manager to take reasonable steps to prevent or address sexual harassment may be treated as a disciplinary matter.

16. COLLEAGUE RESPONSIBILITIES

- Observe, support, promote and abide by the provisions set out in this policy.
- Irrespective of your role, we all have a collective responsibility to ensure a work environment free from sexual harassment.
- Speak to your line manager or a member of the People Services team if you think there are additional steps, we could be taking to protect our people from sexual harassment.
- Ensure any interactions you have with third parties, including customers, suppliers, contractors, agency staff and consultants, meet the provisions set out in this policy.
- Even if it's not your intention to sexually harass someone, that doesn't legitimise your behaviour as it's the impact on the recipient that counts.
- You should be mindful at all times of how your comments and behaviour may be received. For example, whilst a joke may have been intended to be inoffensive, it may be offensive to someone who hears it. If it's of a sexual nature, this may amount to sexual harassment.

17. WHAT TO DO IF YOU WITNESS SEXUAL HARASSMENT OR VICTIMIZATION

If you see something, please don't ignore it. You should never put yourself at risk, but you can:

- intervene if safe to do so
- offer support to the person affected
- encourage them to report it or report it yourself.

You can raise concerns in writing with your line manager. They will handle the matter sensitively and speak with the person affected to decide on next steps. If you do not feel comfortable raising the concerns to your line manager, you may raise them with the People Services team by contacting them at peopleservices@watsonfuels.co.uk, alternatively, you can report it anonymously and in confidence through our whistleblowing process – Whistleblowing Form – Fill in form.

If you have witnessed sexual harassment, and want some more information, please click here ACAS Witnessing Sexual Harassment

Witnesses are protected under the law from victimisation for speaking up in good faith.

18. TRAINING & AWARENESS

To ensure this policy is effective, we provide regular training and awareness for all colleagues:

- All new starters will receive training on sexual harassment, and how to raise concerns as part of their induction.
- All colleagues will complete refresher training at least every two years, or sooner if there are changes in the law or policy.
- Specialist training will be provided to managers to help them recognise, prevent, and respond to harassment appropriately.
- Awareness campaigns and resources will be shared periodically to reinforce the importance of respect, inclusion, and zero tolerance of harassment.
- Records of completed training will be maintained, and failure to attend mandatory training may be treated as a disciplinary matter.

19. SUPPORT FOR THOSE AFFECTED OR INVOLVED

Anyone who raises an allegation of sexual harassment with us in good faith will not be subjected to any detriment as a result.

We'll provide appropriate support to anyone who makes a complaint, or who witnesses an incident. You shouldn't fear retaliation for raising or supporting a complaint of harassment. If you've done so, you'll be protected from being treated less favourably.

We offer 24/7 access to confidential counselling

on request for anyone affected by, or accused of, sexual harassment via our Employee Assistance Programme on **0800 7560861** – quote **'Perkbox'** and **'Watson Fuels'**.

Regardless of the outcome of your complaint, we'll consider carefully how best to approach any ongoing working relationship between you and the individual concerned, including any third party.

20. POLICY REVIEW

This policy does not form part of any employee's contract of employment and may be amended, updated, or withdrawn by the Company at any time.

21. DATA PROTECTION

We process any personal data collected in relation to this policy in accordance with our data protection policy. We will record only the personal information required and keep the information only for as long as necessary.

22. WHERE CAN I GET FURTHER INFORMATION

For further information, please contact the People Services team on PeopleServices@watsonfuels.co.uk

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