Extract from the Zeus Employee Handbook: Sections 6.2 and 6.3, covering bullying, harassment, third-party harassment and sexual harassment

This document is an extract from the Zeus Employee Handbook. References to “this Handbook”, the Grievance Procedure, the Disciplinary Procedure, the Data Protection Policy and other Company policies are defined in the Zeus Employee Handbook. These policies are made available to clients, suppliers, visitors and other third parties as part of the reasonable steps the Company takes under the Employment Rights Act 2025 to prevent harassment of its staff, including by third parties, so that third parties know the Company's policies in this area.

Anti-Harassment and Bullying Policy

Zeus Capital Limited (the “Company”) aims to create an environment in which all employees respect and uphold the dignity and wellbeing of each other. In particular, the Company recognises the right of every employee to work in an atmosphere free of harassment and to complain about it if it occurs.

The Company will not tolerate any form of harassment of any member of staff, or anyone they may come into contact with during the course of their work. Harassment may take many forms. It can range from extreme forms such as violence and bullying, to less obvious actions like ignoring an individual. It can occur both in and outside of the workplace, such as on business trips or at work-related events or social functions. Whatever the form of harassment or bullying it will be unwanted behaviour that is unwelcome and unpleasant. Sexual harassment is dealt with under a separate policy below.

What are Harassment and Bullying?

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Harassment often (but not exclusively) targets a Protected Characteristic of the victim.

A single incident of unwanted or offensive behaviour to one individual can amount to harassment.

Individual employees may in some cases be legally liable for harassment of colleagues or third parties (including clients) and may be ordered to pay compensation by a court or employment tribunal.

Examples of harassment include:

- unwanted physical conduct or "horseplay". Physical conduct ranges from touching, pinching, pushing or brushing past someone or invading their personal space, to grabbing, shoving, punching and more serious forms of physical or sexual assault;
- unwelcome sexual behaviour, which the harasser may perceive as harmless flirting, and which may involve unwanted suggestions, advances, propositions or pressure for sexual activity;
- suggestions that sexual favours may further a career or that refusal of sexual favours may hinder it;
- continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome;

- inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks;
- mocking, mimicking or belittling a person's disability;
- outing or threatening to out someone as gay or lesbian;
- the sending or displaying of material that is pornographic or obscene or that some individuals or groups may find offensive (including emails, text messages, video clips and photographs taken or sent using mobile phones or via the internet);
- ignoring or shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.

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 they create an offensive environment for him or her.

Bullying is offensive, intimidating, malicious or insulting behaviour which, through the abuse or misuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened. Power includes both personal strength and the power to coerce others through fear or intimidation. Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. As with harassment, bullying can take the form of physical, verbal and non-verbal conduct.

Legitimate and constructive criticism of an employee's performance or behaviour or reasonable requests made of employees in the course of their employment will not constitute bullying.

Examples of bullying include:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate and/or derogatory remarks about someone's performance;
- abuse of authority or power by those in positions of seniority;
- unjustifiably excluding colleagues from meetings or communications.

Third-Party Harassment

Third-party harassment may occur where a member of staff is harassed by someone who does not work for the Company, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, derogatory comments about a person's age, disability, or religion, by a client or supplier visiting the Company’s premises, or where a member of staff is visiting a client or supplier's premises or other location in the course of employment.

If this does happen to you, or you witness a colleague being subjected to or engaging in such behaviour, you must inform your Line Manager or HR immediately.

Application of the Policy

This policy covers harassment or bullying which occurs both in the workplace and in settings outside the workplace, such as business trips, events or social functions organised for or on our behalf and whether on or off our premises. If the incident involves sexual harassment, you should refer to the Sexual Harassment Policy.

All employees and workers are expected to comply with this policy. Failure to comply with this policy may result in disciplinary action being taken against you up to and including summary dismissal.

Breaches of the Policy

Wherever possible, if you believe that you have been the subject of harassment or bullying you should, in the first instance, ask the person responsible to stop the harassing behaviour as it is not welcome or makes you uncomfortable. Person-to-person reproof at an early stage will often be sufficient to stop the behaviour that is causing offence without involving third parties.

If you need help or advice, you may wish to seek the involvement of trusted friends. You are of course entitled to raise a formal complaint at any time and in such circumstances, you are asked to use the Company's Grievance Procedure, as set out in this Handbook. You may speak to your Line Manager or HR who can provide confidential advice and assistance in resolving the issue formally or informally. If you feel unable to speak to your Line Manager because the complaint concerns them, you should speak informally to HR. If this does not resolve the issue, you should follow the formal process outlined in the Company’s Grievance Procedure.

If investigation reveals that the complaint is valid, then, if appropriate, disciplinary action designed to stop the harassment and prevent its recurrence will be taken.

If the harasser or bully is an employee, the matter will be dealt with under our Disciplinary Procedure. If the harasser or bully is a third party, you should notify your Line Manager. The Company will then decide what appropriate action will be taken.

Whether or not your complaint is upheld, we will consider how best to manage the on-going working relationship between you and the alleged harasser or bully.

Whilst the aims of this policy are clearly stated, and are to be upheld, any employee who raises a complaint which upon investigation is proven to be deliberately vexatious or in bad faith may be subject themselves to disciplinary action up to and including dismissal.

Sexual Harassment Policy

The Company is committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media. Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. We will take active steps to help prevent the sexual harassment and victimisation of all staff. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support. Sexual harassment can result in legal liability for both the Company and the perpetrator, whether they work for the Company directly or are a third party outside of our control. Sexual harassment may result in disciplinary action up to and including dismissal.

The purpose of this policy is to set out a framework for dealing with any sexual harassment that occurs by staff (including all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns) and also by third parties such as customers, suppliers or visitors to our premises.

What is Sexual Harassment?

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that 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 sexual harassment. It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past. Sexual harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless); or
- offensive emails, text messages or social media content.

A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

What is Victimisation?

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts: (i) Bringing proceedings under the Equality Act 2010, (ii) Giving evidence or information in connection with proceedings under the Equality Act 2010. (iii) Doing any other thing for the purposes of or in connection with the Equality Act 2010. (iv) Alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about sexual harassment.
- Excluding someone because they have raised a grievance about sexual 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.

Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

- In a work situation.
- During any situation related to work, such as at a social event with colleagues.
- Against a colleague or other person connected to us outside of a work situation, including on social media.
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

If any sexual harassment or victimisation of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator. We will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

Third Party Sexual Harassment

Third-party sexual harassment occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment.

Third-party sexual harassment can result in legal liability and will not be tolerated. If this does happen to you, or you witness a colleague being subjected to or engaging in such behaviour, you must inform your Line Manager or HR immediately. Any sexual harassment by a member of staff against a third party may lead to disciplinary action up to and including summary dismissal.

If any third-party sexual harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. These may include (but are not limited to) warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other branches of the business.

Raising a Complaint – Informal

If you are being sexually harassed, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, or you are unsure whether an incident is sexual harassment, you should speak to your Line Manager or HR, who can provide confidential advice and assistance to you. If you feel unable to speak to your Line Manager because the complaint concerns them, you should speak informally to HR. If this does not resolve the issue, you should follow the formal procedure below.

Raising a Complaint – Formal

If you wish to make a formal complaint about sexual harassment or victimisation, you should submit it in writing to your Line Manager (or, if it concerns your Line Manager, to HR).

Your written complaint should set out full details of the conduct in question, including the name of the harasser/victimiser, the nature of the sexual harassment or victimisation (and in the case of victimisation, why you consider you may have been victimised), 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.

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.

If you Witness Sexual Harassment or Victimisation

If you witness sexual harassment or victimisation, you are encouraged to take appropriate steps to address it.

Depending on the circumstances, this could include, for example:

- Intervening where you feel able to do so.
- Supporting the victim to report it or reporting it on their behalf.
- Reporting the incident where you feel there may be a continuing risk if you do not report it.
- Co-operating in any investigation into the incident.

All witnesses will be provided with appropriate support and will be protected from victimisation.

Formal Investigations

We will investigate complaints raised under this policy in a timely, respectful and confidential manner. Individuals not involved in the complaint, or the investigation should not be told about it.

We will arrange a meeting with you, usually within ten working days of receiving your complaint, so that you can give your account of events. You have the right to be accompanied at this meeting by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation.

Where your complaint is about a fellow employee, you can request or we may of our own volition consider or make temporary changes to working arrangements pending the outcome of the investigation. Such changes may include suspension of the alleged harasser on full pay, if circumstances require. The investigator will also meet with the alleged harasser, to hear their account of events. The alleged harasser has a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about someone other than an employee, such as a client, supplier or visitor, 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 Company and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

At the end of the investigation, the investigator will submit a report to the CFO or the Chief Executive Officer (CEO). That individual will arrange a meeting with you, usually within ten working days of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague or a trade union representative to the meeting. A copy of the report and the findings will be given to you and to the alleged harasser.

Action Following the Investigation

If it is considered that there is a case to answer and the harasser is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that sexual harassment occurred, prompt action will be taken to address it. If the harasser is a third party, such as a client or other visitor, we will consider what action would be appropriate to deal with the problem.

Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. We will also consider any requests that you may make for changes to your own duties or working hours to avoid or minimise contact with the alleged harasser.

Any staff member who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of an investigation, may be subject to action under our Disciplinary Procedure. However, you will not be disciplined or treated detrimentally because your complaint has not been upheld.

Appeals

If you are not satisfied with the outcome you may appeal in writing to HR stating your full grounds of appeal, within one week from the date on which the decision regarding your complaint was sent or given to you.

We will hold an appeal meeting, normally within ten working days of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a Board Director of the Company who has not been previously involved in the case. 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 confirm our final decision in writing, usually within ten working days of the appeal hearing. This is the end of the procedure and there is no further appeal.

Protection and Support for those Involved

Staff who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

If you believe you have suffered any such treatment you should inform your Line Manager or HR. If the matter is not remedied, you should raise it formally using our Grievance Procedure or this procedure if appropriate.

We will monitor the treatment and outcomes of any complaints of sexual 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.

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).

Reporting Outcomes, Confidentiality and Record-Keeping

Confidentiality is an important part of the procedures provided under this policy. Details of the 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 under our Disciplinary Procedure.

When appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again. Information about a complaint by or about a staff member may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

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