

Prevention of Sexual Harassment Policy

Version 1.1

Updated by	Alicia Parsons - People Partner
Changes in this Version	Removal of wording in Conclusion
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Prevention of Sexual Harassment Policy

Policy Statement

Wilmington Plc is firm in its commitment to maintaining a workplace that is free from sexual harassment and discrimination. This policy is designed to prevent, address, and eliminate any form of sexual harassment, ensuring that every individual can work in a safe, inclusive, and respectful environment.

This policy applies to all employees, contractors, interns, third parties, vendors, clients, and any other individuals associated with Wilmington Plc in any capacity. It encompasses conduct occurring in the workplace, during work-related activities, and in any interactions that may affect the work environment. This policy also extends to remote work environments and virtual interactions. Sexual harassment occurring in online work settings (video calls, online messaging platforms, etc.) will be treated with the same seriousness as in-person incidents.

Definition of Sexual Harassment

Sexual harassment involves a range of unwelcome behaviours, including but not limited to:

- Unsolicited sexual advances, requests for sexual favours, or any verbal, non-verbal, or physical conduct of a sexual nature.
- Inappropriate or suggestive comments, jokes, or gestures.
- Displaying, sharing, or circulating sexually explicit materials or images within the workplace.
- Unwanted physical contact, such as touching, patting, hugging or any other form of unwelcome physical interaction.
- Making employment decisions based on submission to or rejection of sexual advances.
- Contributing to or creating a hostile, intimidating, or offensive work environment through sexually harassing behaviour.

Reporting and Complaints Procedure

Any employee who experiences or witnesses sexual harassment is encouraged to report it immediately. The reporting process includes:

- **Informal Resolution:** If the employee feels safe doing so, they may choose to address the issue directly with the individual involved. This approach is intended to facilitate open communication and resolution without escalation, where appropriate.
- **Formal Complaint:** Employees can file a complaint with their manager, People Advisor, or designated compliance officer. Complaints can be made verbally or in writing.
- **Confidentiality:** All complaints will be handled with discretion, and confidentiality will be maintained to the extent possible.
- **No Retaliation:** Wilmington Plc prohibits retaliation against any individual who reports harassment or participates in an investigation.

Third-Party Sexual Harassment

Sexual harassment by third parties such as clients, customers, vendors, or members of the public is strictly prohibited and will be treated with the same seriousness as internal cases.

Employees are encouraged to report third-party harassment promptly to their line manager or People Advisor.

We aim to take all reasonable steps to address and prevent recurrence of such incidents, which may include reporting the conduct to the third party's employer or, where necessary, law enforcement authorities.

Protection from Victimisation

In addition to the above, victimisation of any individual who raises a concern, submits a complaint, supports a colleague, or participates in an investigation related to sexual harassment is strictly prohibited. Victimisation refers to any retaliatory act or unfair treatment directed at someone for asserting their rights under this policy.

Examples of victimisation may include:

- Exclusion from meetings or key communications.
- Denial of promotion or professional development opportunities.
- Unjustified changes to job duties or termination as a result of reporting concerns.

All allegations of victimisation will be taken seriously and investigated in accordance with this policy. Individuals found to have engaged in victimisation will face disciplinary action, up to and including dismissal.

Investigation and Resolution

Upon receiving a complaint, the company will promptly initiate a comprehensive and impartial investigation to understand all the details of the claim. To ensure transparency throughout the process, a draft timeline for the investigation will be provided and discussed at the time the complaint is raised.

The process includes:

1. Interviewing relevant parties and reviewing all available evidence to ensure fairness.
2. Taking appropriate corrective action, which may include disciplinary measures up to and including termination, depending on the severity of the offence.

Responsibilities

Preventing sexual harassment is a shared responsibility that requires active participation from everyone within the organisation.

Management: Managers are responsible for fostering an environment of respect, addressing potential concerns proactively, and ensuring that all employees feel comfortable coming forward with complaints.

People Team: Responsible for enforcing this policy, promoting a respectful workplace culture, and taking immediate action when complaints are raised

Employees: Expected to conduct themselves professionally at all times, contribute to a safe and inclusive work environment, and report any instances of harassment they witness or experience.

Training & Awareness: Wilmington Plc will provide regular, mandatory training sessions to ensure that all employees understand their rights, responsibilities, and the appropriate steps to take in reporting concerns. In addition, a comprehensive risk assessment will be completed regularly to identify potential areas of vulnerability and ensure that appropriate mitigation measures are in place.

Consequence of Violation

Employees found to have engaged in sexual harassment may face disciplinary action based on the severity of the offence. Possible consequences include written warning, final written warning, dismissal with notice or summary dismissal. In cases where the misconduct violates the law, legal action may also be pursued. Wilmington Plc is committed to ensuring that all actions are consistent, fair, and in alignment with our goal of maintaining a safe and respectful workplace for all.

Conclusion

Employees Wilmington Plc pledge to maintaining a professional and respectful workplace, free from sexual harassment. All employees are expected to uphold the highest standards of integrity and mutual respect in their interactions.

Wilmington Plc will provide appropriate support to any individual who reports sexual harassment, including access to Employee Assistance Programme or other resources that may assist them through the process.

This policy will be reviewed regularly, to ensure that it remains effective, up-to-date, and in alignment with best practice. If you have any questions, please contact the People Team.