Wilmington plc

Anti-Bullying & Harassment Policy

Version 2.1

Updated By	Alicia Parsons - **Head of People Partnering**
Changes in this Version	Annual Review – no changes
Approved By	Ruth Abdey - **Chief People Officer**
Date of Approval	September 2025
Next Review	September 2026

Internal

Anti-Bullying & Harassment Policy

1. Introduction

Wilmington is committed to providing a safe, respectful and inclusive environment for all employees, clients, contractors, learners and visitors. This policy aims to prevent and address bullying and harassment in the workplace, ensuring that everyone feels treated with dignity and respect. We take a zero-tolerance approach to bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, where appropriate, disciplinary action will be taken. We will also not tolerate a person being victimised or being subjected to unfavourable treatment for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint, and victimisation is a disciplinary offence.

We regard all forms of harassment and bullying as serious misconduct, and any employee who is found to have harassed or bullied a colleague will be liable to disciplinary action up to and including summary dismissal, in line with our Disciplinary Guidelines.

We will consider any aggravating factors that may play a part in any harassment when deciding on the appropriate disciplinary sanction (for example, where there is an abuse of power over a more junior colleague).

2. Responsibility & Scope

All employees, clients, contractors, learners and visitors are responsible for their own compliance with this policy and adhering to the Policy at all times. It covers behaviours that occurs during the normal course of employment for example in the workplace, teams messaging or emails, or at work-arranged activities or events including conferences, training or employee engagement activities (e.g. coffee mornings, festive celebrations etc.).

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3. Definitions & Examples

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

Harassment is unwanted conduct 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 (essentially being treated badly) because they have, in good faith, complained (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 (the original complaint could be against Wilmington or another colleague). This would include isolating someone because they have made a complaint or giving them a heavier or more difficult workload.

Examples of unacceptable behaviour include (but are not limited to):

- Verbal abuse or insults
- Physical threats or assault
- Spreading malicious rumours
- Public humiliation
- Unwanted physical contact
- Inappropriate comments, jokes or gestures
- Exclusion from work-related social events or activities
- Cyberbullying and online harassment

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4. Responsibilities

All employees of Wilmington are expected to treat colleagues with respect and report any instances of bullying or harassment. Management should ensure the implementation and enforcement of this policy, take all complaints seriously and act promptly to address any issues. The People team will provide training, support anyone affected and manage the investigation and resolution process.

5. Resolution Process

Depending on the nature of the incident, the resolution could either be informal or by formal complaint. For informal resolution, if comfortable the affected person could address the issue directly with the perpetrator, explaining how their behaviour is inappropriate. This could be with the support of their line manager or People Advisor. For more serious incidents, where informal resolution has not been successful or if the affected person is not comfortable with an informal approach they should raise a formal complaint. This should be in writing and addressed to either their line manager or the People team. All complaints will be handled with the utmost confidentiality. Each situation is different, but the investigation process is likely to be:

- Initial Assessment – the People team will conduct a review to determine if the complaint requires formal investigation
- Formal Investigation – if necessary, an impartial investigator will be appointed to gather evidence, interview relevant parties and compile a report
- Outcome – based on the investigation findings, appropriate action will be taken, which may include disciplinary action, mediation or other support to reach a reasonable conclusion.

6. Monitoring and Review

We will regularly monitor and review our anti bullying and harassment policy to ensure it remains effective.

This policy will be reviewed annually to ensure it remains current and compliant with relevant legislation.

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