

## 1.1 Policy Statement

Inizio is committed to ensuring that all its staff are treated with dignity and respect and treat others in the same way. We believe that all staff, regardless of role or status, have the right to work in an environment which is free from any form of harassment and/or bullying.

This policy should be read together with our Inizio Group Anti-Harassment and Discrimination Policy.

This policy applies to all staff working for us in the United Kingdom, whether at our premises, at home or elsewhere, including agency workers, apprentices, consultants, contractors, directors, employees, homeworkers, interns, temporary workers and volunteers.

We have carried out an assessment to assess the risk of different forms of harassment occurring in our workforce, including in different roles and departments, the steps we could take to reduce those risks and which of those possible steps are reasonable. This risk assessment will be reviewed annually. The current assessment is available by request from the HR department.

## 1.2 Communication

Inizio is committed to ensuring that all employees are informed about the Anti-Harassment and Discrimination policy. All UK employees are required to read this policy and to ensure that they understand what types of behaviour may amount to bullying standard harassment or sexual harassment. In the event of any issues, employees can expect to receive support and guidance from HR.

## 1.3 Principles

Inizio has a zero-tolerance approach to any form of discrimination. Unlawful discrimination and harassment towards/from, including but not limited to co-workers, including management and senior leadership is prohibited as is any form of unfair discrimination to/from third parties with whom you may come into contact. This includes applicants for employment, interns (whether paid or unpaid), independent contractors, subcontractors, vendors, consultants or any other individual conducting business with the Company (collectively referred to as "third parties").

Additionally, this policy applies not only while an individual is on Company premises, but also applies if working on or visiting a client site, attending a work related event either on or off Company premises (including, business trips, training sessions, social events), at a patient's home address or government building such as a surgery or hospital, at client meetings and conferences, or online (e.g. digital platforms such as Facebook, WhatsApp, LinkedIn, X, Instagram etc.)

To achieve our goal of providing a workplace free from discrimination, bullying and harassment, we have included in this policy definitions and examples of conduct that will not be tolerated and have provided a procedure where if anyone believes they have encountered harassment can formally complain via People Services and/or Speak Up.

## 1.4 Sexual Harassment

Inizio will not tolerate sexual harassment, whether by a member of staff or a third party.

This policy applies equally to all individuals, regardless of gender identity or expression. Inizio is committed to eliminating power imbalances and creating a culture where all individuals can work free from fear of unwanted sexual conduct.

It is also harassment to treat someone less favourably on the basis they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to, sex or gender reassignment.

Sexual harassment can result in legal liability for both the Company and the perpetrator, whether they work for us or are a third party outside of our control.

For the purposes of this policy, sexual harassment is defined as unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Such conduct is unlawful and a serious disciplinary matter. The Company will consider any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

Examples of sexual harassment include when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or a third party's engagement;
- submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment (such as favourable reviews, salary increases, promotions, increased benefits or continued employment); or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, degrading, humiliating or offensive environment, even if the complaining individual is not the intended target of the sexual harassment.

The following are examples of what constitutes sexual harassment (this list is not exhaustive):

- unwelcome sexual advances—whether they involve physical touching or not;
- requests for sexual favours in exchange for actual or promised job benefits, such as a favourable review, salary increase, promotion, etc.;
- touching in a way that may make an employee feel uncomfortable, such as kissing, hugging, patting, pinching, or intentional brushing against another's body;
- making sexually suggestive gestures;
- displaying or communicating sexually suggestive or pornographic objects, pictures, posters, cartoons, screensavers, calendars, etc.;
- sending messages by email, instant messenger, text, WhatsApp, social media or any other method containing sexual content or references;
- use of sexual epithets, jokes, innuendos, vulgar or offensive conversations, teasing, or gossip regarding one's sex life, deficiencies or prowess, or that of another;
- commenting about a person's physical appearance in a sexually suggestive manner;
- inquiries into one's sexual experiences or discussion of one's sexual activities;
- repeated requests to go on a date or to socialise outside of work then this is unwanted; and/or
- other verbal or physical conduct of a sexual nature.

Sexual harassment would also occur where a person is sexually harassed by someone who does not work for, and who is not an agent of, Inizio, but with whom they have come into contact during the course of their employment. This is known as third-party harassment and could include, for example, unwelcome sexual advances from a client, customer or supplier visiting Inizio premises, or where an employee is visiting a client, customer or supplier's premises or other location in the course of their employment. Clients, customers and suppliers will be required to confirm their adherence to the legislation.

### 1.5 Standard (Protected Characteristic) Harassment

"Standard" harassment may relate to any of the Equality Act 2010 protected characteristics, i.e. age, race, colour, nationality, ethnic or national origins, religion or belief, gender, sexual orientation, disability (past or present), gender reassignment, and is strictly prohibited. The phrase 'relate to' is very wide and covers harassment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that their perception is, in fact, wrong; and harassment that occurs because someone is associated with another person, for example, someone who is harassed because they care for a disabled person, or who is harassed because they are friends with a trans person, or a white worker who sees a black colleague being subjected to racially abusive language which also causes an offensive environment for them.

The following are some examples of conduct which are likely to be regarded as Protected Characteristic Harassment (this list is not exhaustive):

- use of derogatory words, phrases, epithets, jokes, slurs or negative stereotyping about a Protected Characteristic;
- committing threatening, intimidating, or hostile acts towards an individual or group based on a protected class trait;
- sending messages by email, instant messenger, text, WhatsApp, social media or any other method containing derogatory statements regarding a particular ethnic group, race, religion or other legally protected status;
- demonstrations of a racial or ethnic nature such as use of gestures, pictures or drawings which would offend a particular protected individual or group;
- comments about an individual's skin colour or other racial/ethnic characteristics;
- misogynistic banter or displays of misogyny, for example, allocating demeaning tasks to female colleagues to humiliate them;
- making disparaging remarks about an individual's gender that are not sexual in nature;
- intentionally referring to someone who has transitioned by the incorrect name or gender or inappropriate questioning about their medical treatment;

- maliciously disclosing or gossiping about someone's gender history;
- teasing or name calling about an individual's sexual orientation (real or perceived);
- homophobic "jokes";
- "outing" a person (i.e., revealing their sexual orientation) against their wishes;
- negative comments about an individual's religious beliefs (or lack of religious beliefs);
- expressing negative stereotypes regarding an individual's birthplace or ancestry;
- negative comments regarding an individual's age;
- telling jokes related to age or the perceived effects of age;
- mimicry and imitation of the disabled person and/or
- making derogatory or intimidating references (including jokes or name-calling) to an individual's disability.

Harassment related to Protected Characteristics is unlawful:

- even though harassment was not intended and the person doing it was unaware that offence might be caused (for example, you may feel that you know your colleagues and that they will not be offended by a joke about race, religion or sexual orientation, but if they (or someone who overhears) turn out to be offended, you are likely to be guilty of harassment);
- even though the person complaining does not have the protected characteristic;
- even if it is not based on the characteristics of a colleague but on those of someone associated with them (for example a partner or child).

## 1.6 Harassment and Bullying Procedure

Because we take harassment and bullying seriously, informal and formal reporting procedures have been introduced which are separate from our Grievance procedure, as a way of dealing with complaints of harassment and/or bullying. However, employees may choose to use the Grievance procedure as an alternative.

Any allegation of harassment or bullying will be dealt with seriously, promptly and in confidence. Complaints will not be ignored. Employees who feel they have been subject to harassment or bullying must not hesitate in using this procedure, and they should not fear victimisation. Retaliation against an employee who brings a complaint of harassment or bullying is in itself a serious disciplinary offence which may constitute gross misconduct and could result in dismissal.

We will provide, in confidence, support and assistance to employees subjected to harassment or bullying and assist in the resolution of any problems, whether through informal or formal means.

You may prefer to try to resolve the matter on an individual basis, if you feel able to do so. In some cases, it may be possible for the affected person to explain clearly to the perpetrator that the behaviour in question is not welcome, that it offends them, makes them uncomfortable or interferes with their work, and that they want it to stop—and this may be enough to make it stop. However, the affected person may not always feel able to take this step, and in more serious cases it will not be appropriate.

If you wish to make an informal complaint, you should put this in writing to your manager; that person, in most cases, will be best placed to respond to the complaint. There may be occasions where it is inappropriate to raise the matter informally, in which case you should proceed straight to the formal procedure. If the complaint is about that manager, you should raise the grievance with another manager or proceed straight to the formal procedure.

When we are considering a complaint of harassment or bullying, we will seek to do so in a way that is fair and sensitive to the person who made the complaint, anyone who witnessed it and anyone accused of harassment or bullying. We will talk to the person who made the complaint to find out more about the issue and how they would like it handled. We will try to take what they would prefer into account and agree our approach together. For example, if they want the matter to be handled informally, but it is an extremely serious matter, we might suggest handling it formally instead. Equally, if they have made a formal complaint and we think it is appropriate to try to resolve it informally first, we may suggest that.

You are advised to make a formal complaint where serious harassment or bullying occurs, or informal methods fail or are not appropriate. The formal complaints procedure is as follows:

- Unless there are exceptional circumstances that make it impracticable to do so, employees, (including any third parties subject to this policy) who believe that they have experienced or witnessed conduct that they believe is contrary to this policy should report such issues to the Employee Relations team by either raising their complaint via a ticket through ServiceNow, their Senior People Partner or/and Global Head of People & Culture. You may also want to inform your line manager of the complaint for support.
- For UK employees that work for a part of the business which is out of scope for the Employee Relations team, please report your concern to your local HR team using your local reporting procedure.

- Complaints may be made verbally or in writing (including via email). Complaints relating to other forms of discrimination not covered by this policy should be reported by following the Grievance procedure in the usual way.

To enable us to deal with your complaint properly, your written complaint should set out full details of the behaviour in question, including the name of the perpetrator, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken to attempt to stop it occurring.

Employees (both in scope and out of scope of Employee Relations) can also raise concerns using our confidential reporting tool Speak Up: [inizio.ethicspoint.com](https://inizio.ethicspoint.com). Unless specific details are provided, we may be unable to investigate or take disciplinary action in relation to an anonymous report. However, we will keep record of sexual harassment complaints to watch for any patterns of unwanted behaviour.

Country	Freephone Number	Country	Freephone Number
Austria	0800 068721	Ireland	1800 903 361
Belgium	0800 29 444	Poland	0-0-800-111-1111
Canada	(844) 273-2789	Portugal	800 181 736
China	400 120 4140	Singapore	800-001-0001
France	0 805 08 05 74	Spain	900 997 942
Germany	0800 1862378	Turkey	0811-288-0001
Hong Kong	800 962 035	United Kingdom	0800 069 8746
India	000 800 0502 108	United States	(844) 273-2789

- Do not wait to report the conduct. Inizio encourages you to speak up promptly so that rapid and constructive action can be taken.

In addition to taking steps to prevent occurrences of harassment from colleagues and third parties, Inizio will also make every effort to stop alleged harassment before it becomes severe or pervasive, and to prevent it happening again, but can only do so with your cooperation.

All line managers and managers who receive a report, complaint or information about suspected alleged discrimination or unlawful harassment, or observe, become aware of or receive information about conduct that might violate this policy, must contact their respective Senior People Partner in the first instance.

Additionally, if you are subjected to or witness any forms of harassment or victimisation and feel comfortable doing so, you should promptly advise the perpetrator that their behaviour is unwelcome and requesting that it stop. You may wish to do this with the support from a colleague, your manager or HR. Depending on the circumstances, this could include intervening where you feel able to do so and/or supporting the victim to report it or reporting it on their behalf.

We will keep an open mind when dealing with a complaint, in particular we will avoid making assumptions and look into any complaint thoroughly and fairly, keeping in mind any sensitivities that may make it hard for an employee to speak up about harassment or bullying.

We will seek to offer support to those who experience or witness harassment or bullying, and those accused of harassment or bullying. In particular, both the complainant and the alleged perpetrator may seek support [through our employee assistance programme], details of which are available through [the HR department].

When the investigation has been completed, the complainant and the alleged perpetrator will be informed whether or not the allegation is considered to be well-founded. The complainant will have the right to appeal against this decision, by following the procedure in Inizio's grievance procedure.

If the allegation is well-founded, disciplinary action may be taken in accordance with the disciplinary and dismissal procedure against the person alleged to have committed the behaviour complained about and, depending on the circumstances and the seriousness of the complaint, may result in the dismissal of that person with or without notice.

If the allegation is found to be not well-founded, consideration may be given to whether it is necessary to transfer or reschedule the work of both or either party, in cases where it would not be appropriate for either of them to continue to work in close proximity to each other.

Malicious complaints of harassment or bullying can have a serious and detrimental effect upon a colleague and the workplace generally. An employee will not be subjected to disciplinary action or to any other detriment simply because their complaint is not upheld. However, an employee may face disciplinary action in accordance with our disciplinary policy if the allegation is found to be both false and made in bad faith (i.e. without an honest truth in its belief). We are sure that all employees appreciate that this is necessary to protect the integrity of this policy.

2. Preventative action

All UK employees will be required to complete mandatory training to ensure that they are aware of the requirements set out in this policy regarding anti-harassment and discrimination.

Any conduct that breaches this policy, including engaging in harassment, and (with respect to managers and line managers), failing to report and/or allowing any such conduct to continue, may result in disciplinary action up to and including termination of employment.

Where a complaint of unlawful harassment is about someone other than an employee, such as a customer, supplier or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, and to deal with the problem, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

3. Revision History

Version	Effective Date	Key Changes
Initial	%approveDate%	



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