



KONTRAKT

**EQUAL OPPORTUNITIES
AND ANTI-HARASSMENT
AND BULLYING POLICY**

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This policy document applies to your employment at all sites that you may be asked to work at from time to time

1. Policy Statement

- 1.1 The Group is an equal opportunity employer and is committed to ensuring that the terms and conditions of employment of the employee and potential employee are equitable and non-discriminatory. This means that job applicants and employees will be treated fairly regardless of their sex, marital status, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs.
- 1.2 The Group will seek to promote equal opportunities and prevent harassment and bullying by publicising and communicating this policy by providing appropriate training and guidelines for those with designated responsibilities and by raising awareness through staff development.
- 1.3 Further, the Group will continually monitor its policies and practices to ensure that these principles are upheld. It is the employee's right to be treated with dignity and respect, which in turn will be conducive to performance, self-development and career advancement. Every executive, manager and employee has a responsibility to implement this policy.

2. Definitions

2.1 Discrimination

- 2.1.1 For the purposes of this policy, discrimination means treating people less favourably than others on the grounds of their sex, marital status, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs, whether this be direct or indirect by applying a provision, criterion or practice, which disadvantages such persons.

2.2 Sexual Orientation

- 2.2.1 For the purposes of this policy, sexual orientation means sexual orientation for a person of the same sex, different sex or for persons of both sexes. Discrimination can occur based on a perception of a person's sexual orientation, even if that perception is wrong. It can also include discrimination against a person by reason of the sexual orientation of someone they associate with.

2.3 Religion/Religious Beliefs

- 2.3.1 For the purposes of this policy, gender reassignment means a desire to be known or to become a person of a gender different to that to which they were born.

2.4 Religia lub przekonania religijne

- 2.4.1 For the purposes of this policy, religion or religious beliefs is defined as any religion, religious belief or similar philosophical belief. It does not include philosophical or political beliefs unless that belief is similar to a religious belief. Discrimination can occur based on a perception of a person's religion or beliefs even if that perception is wrong. It can also

include discrimination against a person by reason of the religion or religious beliefs of someone they associate with.

2.5 Harassment

2.5.1 For the purposes of this policy harassment is defined as any hostile unwanted, unreasonable and/or offensive behaviour, which adversely affects a person's dignity, self-confidence and well-being and creates a hostile environment and which leads to that person feeling intimidated, degraded or humiliated.

2.6 Racial harassment

2.6.1 For the purposes of this policy racial harassment is defined as any action, conduct, comment, gesture or behaviour that is offensive, embarrassing, insulting or intimidating. It may include derogatory remarks, quips, jokes, innuendoes, taunts or physical abuse which is racially derogatory and potentially offensive and relates to a person's race, religion or ethnic origins.

2.7 Sexual harassment

2.7.1 For the purposes of this policy sexual harassment is defined as:

- Any action, conduct, comment, gesture or physical contact of a sexual nature that is unwelcome and might reasonably be seen by an employee or prospective employee as placing an implicit or explicit condition on employment.
- Any persistent, unwelcome action, conduct, comment, gesture or physical contact of a sexual nature that is likely to cause offence, embarrassment or humiliation to an employee or creates an offensive working environment.

2.8 Bullying

2.8.1 For the purposes of this policy bullying is defined as repeated treatment with the purpose of controlling individuals or making them insecure in their roles or treatment that has that effect

2.9 Victimisation

2.9.1 For the purposes of this policy, victimisation is defined as treating persons less favourably because of something they have done under or in connection with asserting their rights under any employment legislation or regulations.

3. Procedure For Discriminatory Conduct

3.1 Any member of staff may use the Group's grievance procedure to complain about discriminatory conduct. The complaint will be thoroughly investigated and considered based on the facts of the investigation. No individual will be penalised for raising such a grievance unless it is made in bad faith. If the matter relates to harassment or bullying of any kind the anti-harassment and bullying procedure set out below should be followed.

3.2 Any employee who discriminates against any other employee on the grounds of sex, marital status, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs, will be subject to the Group's disciplinary procedure. In serious cases where such behaviour has been deemed to constitute gross misconduct it will result in summary dismissal in the absence of mitigating circumstances. This statement should be read in conjunction with the anti-harassment and bullying procedure set out below at clause 4.

4. Anti-Harassment & Bullying Procedure

4.1 As well as its commitment to equal opportunities, the Group is committed to providing a work environment for employees, which is free from harassment or bullying on the grounds of sex, marital status, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs. This may include embarrassment, intimidation, threats or discrimination.

4.2 Reasonable measures will be taken to ensure that no employee is subject to harassment or bullying. In recognition of these principles the Group will also not condone any conduct, which may be construed as sexual harassment.

4.3 Any complaints of harassment or bullying should be made to a director of the Group. The matter will be dealt with in a discreet and confidential manner and appropriate action will be taken. It is the duty of all employees and in particular management and supervisors, to ensure that the anti-harassment & bullying policy is implemented. Harassment or bullying will be taken to have occurred if a reasonable individual would or ought to have known that the behaviour was unwelcome or offensive.

4.4 Harassment and bullying are disciplinary offences that may in the most serious cases lead to dismissal. Individuals should be aware that in some circumstances they may be held personally liable for acts that are unlawful.

4.5 Incidents of sexual or racial harassment can be taken to amount to gross misconduct, which will be dealt with under the Group's disciplinary policy and may lead to summary dismissal. Less serious infringements may lead to an apology from the harasser, letter of reprimand, suspension or relocation of the harasser.

4.6 In dealing with reports of harassment or bullying the following principles will apply:

- All reports will be taken seriously, treated in confidence and investigated by trained staff who are independent of the situation.
- All complaints will be progressed and dealt with according to the grievance procedure. Where the Group has reason to believe that there is a risk to the personal safety of the complainant or of another person, or that a criminal offence has been committed, the Group may take legal advice and/or inform the police before proceeding with any internal action.
- The victimisation or harassment of a complainant or the respondent, or any witnesses will be regarded as a disciplinary offence.
- Malicious complaints will be regarded as a disciplinary offence.

5. Date of Implementation

5.1 This policy is effective from the first day of operation of the Group and shall not apply to any actions that occurred prior to this date.

6. Questions

6.1 If you have any questions regarding this policy document and how it applies to you please consult your manager.

7. Alterations

7.1 This policy will be subject to change and updating.