

# BULLYING & HARASSMENT

Dignity and respect for everyone at work



Wavepoint Group Limited — Our commitment to dignity and respect, and a workplace free from bullying and harassment

<b>Document owner</b>	Managing Director	<b>Policy reference</b>	WPG-HR-04
<b>Version</b>	1.0	<b>Status</b>	Approved
<b>Date issued</b>	24 June 2026	<b>Next review</b>	24 June 2027
<b>Approved by</b>	Jason Alexander, Managing Director	<b>Applies to</b>	All employees, workers & contractors

## OUR DIGNITY-AT-WORK COMMITMENTS AT A GLANCE



**Dignity &  
Respect**



**Zero  
Tolerance**



**Everyone  
Covered**



**Report  
It**



**Fair  
Process**

## 1. Policy Statement

Wavepoint Group Limited is committed to providing a working environment in which everyone is treated with dignity and respect. Bullying, harassment and victimisation of any kind will not be tolerated, whether by colleagues, managers, customers, suppliers or other third parties, and whether it takes place at work, off-site, at work-related events or online. Everyone has the right to work in an environment free from intimidation and humiliation.

## 2. Scope

This policy applies to all employees, workers, agency staff, contractors and volunteers, and covers conduct in the workplace and in any work-related setting. It does not form part of any employee's contract of employment and may be amended at any time.

## 3. Definitions

### Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or injures the person on the receiving end. It may be a single serious incident or a persistent pattern, and may be face to face, in writing, by phone or online.

## Harassment

Under the Equality Act 2010, harassment is unwanted conduct related to a protected characteristic (age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation) which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also includes unwanted conduct of a sexual nature (sexual harassment). Harassment may occur even if it was not directed at the complainant, and even if no offence was intended.

## Victimisation

Victimisation is treating someone less favourably because they have made or supported a complaint, or raised a concern, under this policy or the Equality Act.

Examples of bullying and harassment can include: spreading malicious rumours; unfair or humiliating treatment; offensive or insulting jokes, comments or "banter"; unwanted physical contact; sexual advances or innuendo; displaying or sharing offensive material; exclusion or victimisation; and overbearing or intimidating supervision. Legitimate, reasonable and constructive management of performance or conduct is not bullying.

## 4. Legal Framework

---

This policy supports our duties under the Equality Act 2010, the Protection from Harassment Act 1997, and the Worker Protection (Amendment of Equality Act 2010) Act 2023, which requires employers to take reasonable steps to prevent the sexual harassment of their workers. We keep our arrangements under review in light of developing law.

## 5. Responsibilities

---

- Everyone is responsible for treating colleagues and others with dignity and respect, and for not engaging in or condoning bullying or harassment.
- Managers must lead by example, be alert to behaviour that may amount to bullying or harassment, address concerns promptly and fairly, and support anyone who raises one.
- As part of our preventative duty, we provide guidance and training, maintain clear reporting routes, assess and act on risks (including third-party harassment), and handle concerns promptly.

## 6. Raising a Concern

---

### Informal approach

If you feel able to, it can help to tell the person that their behaviour is unwelcome and ask them to stop, or ask your manager or a colleague to help you do so. Many issues can be resolved this way.

### Formal approach

Where an informal approach is not appropriate or has not worked, you should raise a formal complaint through the Grievance Procedure, or directly with a Director or the Managing Director. You may also raise concerns under the Whistleblowing Policy where appropriate. Set out what happened, when, who was involved and any witnesses. You may be accompanied by a colleague or trade union representative at any meeting.

Support is available throughout — you can speak in confidence to your manager, a Director or the Managing Director, and access support through your GP and, for members, our Company Private Health Scheme.

## 7. Investigation and Confidentiality

---

Complaints will be taken seriously, investigated promptly, thoroughly and fairly, and handled as confidentially as possible. Both the complainant and the person complained about will be treated with respect and given the opportunity to be heard. We will take steps to support those involved during the process and to prevent any recurrence.

## 8. Protection from Victimisation

---

No one will be subjected to any detriment for making a genuine complaint, or for supporting someone else's complaint, in good faith — even if the complaint is not upheld. Victimising or retaliating against someone for raising a concern is itself a serious disciplinary matter. However, complaints found to be malicious or made in bad faith may lead to disciplinary action.

## 9. Consequences

---

Bullying, harassment or victimisation will be treated as misconduct under our disciplinary procedures, and serious cases — including sexual harassment — may constitute gross misconduct, potentially resulting in dismissal. Harassment may also be unlawful and, in some cases, a criminal offence.

## 10. Review

---

This policy is reviewed at least annually, and sooner if legislation, guidance or circumstances change.

### Approved and signed on behalf of Wavepoint Group Limited



<b>Signed</b>	Jason Alexander
<b>Position</b>	Managing Director (Employer)
<b>Date</b>	24 June 2026
<b>Review date</b>	24 June 2027

— End of Bullying & Harassment Policy —