

**Purpose and Scope**

“Harassment” consists of any unwanted conduct that violates an individual’s dignity or constitutes victimisation, or which creates an intimidating, bullying, abusive, hostile, degrading, humiliating, offensive or otherwise uncomfortable environment. This includes harassment related to the protected characteristics of sex, race, national origin, ethnic origin, age, disability, sexual orientation, gender reassignment, religion or belief. It can involve a single incident or may be persistent and may be directed towards one or more individuals.

Alto Aerospace Ltd. does not tolerate acts of harassment committed by employees, or by third parties against its employees. Please note that harassment can be a criminal offence, punishable by fines and even imprisonment. Harassment is unacceptable both in the work place and in any work-related setting outside of the work place such as business trips or business-related social events.

If you have been subject to, or have witnessed, any acts of harassment on and/or off company’s premises you may use this procedure to make a complaint as an alternative to that described in the Grievance Policy.

This policy applies equally to full time and part time employees on a substantive or fixed-term contract, and to associated persons who work for Alto Aerospace Ltd. such as secondees, agency staff, contractors and others employed under a contract of service.

**Unacceptable behaviour**

Harassment, bullying and/or victimisation may constitute gross misconduct. The Discipline Policy procedures, whether formal or informal, may be invoked where there is evidence of misconduct and/or gross misconduct. Sanctions may include summary dismissal.

Please note that victimisation of or retaliation upon anyone who makes a complaint in good faith or assists in the investigation of alleged harassment is in itself a disciplinary offence and may lead to summary dismissal.

Single or continual acts may constitute harassment. In general, conduct becomes harassment if it persists once it has become clear that the recipient regards it as offensive.

All complaints will be dealt with confidentially and promptly and you may seek support or advice from your line manager and/or Human Resources at any stage.

Alto Aerospace Ltd. encourages prompt reporting of complaints or concerns regarding harassment because prompt reporting and intervention has proved to be the most effective method of resolving actual or perceived incidents of harassment. Under normal circumstances, a complaint must be made as soon as possible and, in any event, within two weeks of the alleged incident (or the last of such alleged incidents) taking place.

All individuals involved in any harassment complaint will be asked to maintain the confidentiality of the discussions which are held.

Alto Aerospace Ltd. will treat all complaints of harassment seriously, however if it is established during any investigation that you have made a capricious, false or malicious accusation or your complaint is without foundation, then you yourself may be subject to disciplinary action.

The following list is not exhaustive but is intended to provide a number of examples of unacceptable behaviour:

- unwanted physical contact such as unnecessary touching or brushing against another employee's body, patting, pinching, insulting or abusive behaviour or gestures, physical threats, assault, coerced sexual intercourse or rape;
- unwanted verbal conduct such as unwelcome advances, patronising nicknames, propositions or remarks, innuendo, lewd comments, jokes, banter or abusive language, which refer to an individual or a group's race, nationality, ethnic origin, age, language, religion or similar belief, political or other opinion, affiliation, gender, gender reassignment, sexual orientation, marital status or civil partnership, connections with a national minority, national or social origin, property, birth or other status, family connections, or disability, etc.
- repeated suggestions for unwanted social activities;
- unwanted non-verbal conduct such as graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, display of pornographic or sexually suggestive literature, pictures, films, objects, or inappropriate use of network systems for this purpose;
- bullying, including persistent inappropriate criticism and personal abuse and/or ridicule, either in public or private, which humiliates or demeans those involved;
- unlawful victimisation such as treating an individual less favourably than others are, or would be treated in the same or similar circumstances, because they have made a complaint or allegation of discrimination or have acted as a witness in connection with proceedings under any anti-discrimination legislation
- any other conduct that denigrates an individual or group.

### **Informal action**

If you are the subject of harassment you may deal with the matter informally and/or formally. If you have been subject to, or have witnessed, harassment, victimisation or bullying and if you feel able you should tell the person(s) responsible for the behaviour in question that it is offensive and that it must stop. You must explain what behaviour you find unacceptable, unwelcome or embarrassing.

Alternatively, you may prefer to put your complaint in writing to the person(s) responsible for the behaviour in question; or, to ask a work colleague or Human Resources to speak to the person(s) on your behalf. You must keep a note of all relevant details.

This approach may be sufficient to correct a situation where those involved were unaware of causing offence. However, if an informal approach is unsuccessful or you continue to be subjected to the behaviour, you may prefer to raise the matter formally.

### **Formal action**

Statement of harassment - Whether or not informal action has been taken, if you have been subject to, or have witnessed, harassment you can raise the matter directly with your line manager in writing. You must provide as much detail as possible of the alleged harassment. If required, you will be invited to a meeting to discuss the matter in more detail prior to any investigation taking place.

Depending on the circumstances, you may raise the matter directly with Human Resources or speak to your line manager who will inform Human Resources. Your complaint will be treated sensitively, seriously and confidentially.

Both the complainant and the alleged offender have the right to be accompanied by a work colleague or a trade union official to any subsequent meeting. Where any party chooses not to be accompanied this will be noted.

Colleagues attending any meeting may ask questions of clarification and confer with you but may not answer questions on your behalf.

### **Investigation**

An investigating manager not previously involved in the case, will be assigned to collect details of the alleged harassment and to allow the alleged offender to give his/her side of the case. This may include meetings and gathering witness statements, where relevant. The investigating manager will draft a factual written report of the investigation. Where appropriate, the alleged offender may be transferred to another work area during the investigation procedure or suspended on full pay.

The alleged offender will be given the opportunity to see the written complaint against him/her, but only in exceptional circumstances will he/she be allowed to speak to you directly.

### **Meeting**

You will be invited to attend a meeting conducted by an independent manager in order to discuss the matter. This shall take place as soon as is reasonably practicable. You should take all reasonable steps to attend the meeting.

Human Resources will be present to ensure the steps described in this policy are followed and to take minutes.

The independent manager will confirm in writing to all parties involved, usually within 10 working days of the date of the meeting, that either:

- a) harassment has occurred and the Discipline Policy procedures shall be invoked, or
- b) no harassment has occurred.

You will be notified of your right to appeal against the decision.

If the complaint is well-founded, it may be necessary to separate the parties; to the extent this is possible.

### **Appeal**

Where you consider, as complainant, that the matter has not been satisfactorily resolved, you may appeal by informing Human Resources of the grounds for your appeal in writing, within 5 working days of being notified of the independent manager's decision.

An independent senior manager, not previously involved in the case, will consider the appeal. This shall take place as soon as is reasonably practicable at an appeal meeting to which all parties involved shall be invited.

Human Resources will be present to ensure the steps described in this policy are followed and to take minutes.

The independent senior manager will confirm in writing to all parties involved, usually within 10 working days of the date of the appeal meeting, that either:

- a) harassment has occurred and the Discipline Policy procedures shall be invoked, or
- b) no harassment has occurred.

This decision is final and no further appeal within Alto Aerospace Ltd. may be made.

Where harassment has been proved a report of the stages and outcome of the procedure shall remain for up to 18 months at Alto Aerospace Ltd.'s discretion on the Human Resources file of the person found responsible for causing the harassment.

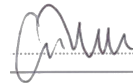
This policy is for guidance only and does not form part of your contract of employment.

Signed on: 17<sup>th</sup> January 2019



Chris Yendell

Managing Director



Giles Trotter

Managing Director