



Severn Group

Anti-Harassment Policy

NOVEMBER 2022

The Approach

Severn is committed to building a culture where everyone feels an equal sense of belonging. To achieve this, we must ensure that our environment is free of harassment, and that everyone is treated, and treats others, with dignity and respect. The Company will not permit or condone any form of harassment.

Who does this Policy apply to?

This Policy covers harassment of or by anyone employed by the Company, and also by third parties such as customers or suppliers. This Policy encompasses harassment that occurs both in the workplace and out of the workplace in the course of employment, such as on business trips or at work-related social events.

What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. A single incident of this nature can amount to harassment if sufficiently serious.

Unlawful harassment may involve sexual harassment, or it may be related to any other of the Protected Characteristics detailed in our Equality, Diversity and Inclusion Policy (age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation). The Company's stance is that harassment in any form is unacceptable, whether or not it is targeted at any of these categories.

It is important to note that harassment occurs even if the harasser perceives their behaviour as being harmless and without malice. What matters is how the behaviour makes the recipient feel, and not what the perpetrator's intentions were. Also, a person may be harassed even if they were not the intended 'target' of the behaviour. For example, a man may be harassed by sexist jokes about women that he overhears if the jokes create an environment that is offensive to him.

Managers are duty-bound to give their team members feedback and to generally manage their performance. Legitimate, reasonable and constructive criticism of a team member's performance or behaviour, or reasonable instructions given to an employee in the course of their employment, will not amount to harassment.



Accountability

The Approach

Raising concerns

If you feel you are being or have been harassed you may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it. If you feel able to, tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately.

If the informal approach is not appropriate or has not been successful, employees should refer to our Grievance and Disciplinary Policies which outline the relevant procedures. This includes with whom an employee should raise a grievance – this will be the Line Manager in the first instance or the People Department.

Particularly serious complaints could amount to gross misconduct and lead to dismissal. This applies to the most senior levels of management as well as to other employees. Further, some forms of harassment may amount to both an employment protection matter and a criminal matter.

Where a concern is raised this will be treated confidentially and the name of the person raising the concern and those who are subsequently involved in any investigation will be disclosed on a “need to know” basis only.

Where a concern has been raised with the People Department that an employee does not want to take further, the People Team may need to investigate the matter as part of its duty of care to other employees.

Consequences of a breach of this Policy

If after due investigation it is considered that a team member has been harassed by an employee the matter will be dealt with under our Disciplinary Policy.

Some harassment will constitute unlawful discrimination if it relates to any of the Protected Characteristics as detailed above and in the Equality, Diversity and Inclusion Policy. Such behaviour could constitute a criminal offence.

Where it is found that an employee has been harassed by a third party, such as a customer or supplier, the Company will take such steps as are reasonably practicable to investigate and prevent any recurrence.

The Approach

Support

Team members who make a complaint, or who participate in any investigation must not suffer any form of retaliation, detriment or victimisation as a result. Any employee engaged in retaliation will be subject to disciplinary action.

How we can all help to stop harassment

We all have a shared responsibility to help create and maintain a working environment free of harassment. You can do this by:

- Considering how your own behaviour may affect others, and changing it;
- Being receptive, rather than defensive, if asked to change your behaviour;
- Treating your colleagues with dignity and respect;
- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable;
- Reporting harassment to your Manager or the People Department;
- Being open, honest and objective in any investigation of complaints.

Managers have a particular responsibility to:

- Set a good example by their own behaviour;
- Ensure that there is a supportive working environment in their team;
- Communicate to team members what standards of behaviour are expected from them;
- Intervene to stop harassment;
- Report promptly to The People Department or Senior Management any complaint of harassment.

Agreement to follow this Policy

This Policy is fully supported by The Board and Executive Team.

This Policy is non-contractual, and the Company reserves the right to update it at any time.

This Policy should be read in conjunction with the Code of Conduct, Disciplinary Policy, Grievance Policy and Equality, Diversity and Inclusion Policy. All Severn Group Policies can be accessed on the Policy Hub of the Groups' SharePoint site.



At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



Customer



Integrity



Excellence



Accountability



SEVERN
Superior Valve Engineering