



Severn Group

Anti-Harassment Policy

AUGUST 2025

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 victimisation, and that everyone is treated, and treats others, with dignity and respect. The Company will not permit or condone any form of harassment or victimisation.

Who does this Policy apply to?

This Policy covers harassment or victimisation of or by anyone employed by the Company, and also by third parties such as customers or suppliers. This Policy encompasses harassment and victimisation 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 conduct of a sexual nature (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. The law requires employers to take reasonable steps to prevent sexual harassment of their staff during the course of their employment.

Examples of sexual harassment include but are not limited to:

- Unwanted physical contact such as touching, hugging, pushing.
- Unwelcome sexual advances and suggestive behaviour.
- Offensive emails, texts, WhatsApps, or social media content.
- Continued suggestions for sexual activity, when it has been made clear the advances are unwelcome.



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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.

What is victimisation?

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- Bringing proceedings under the Equality Act 2010.
- Giving evidence or information in connection with proceedings under the Equality Act 2010.
- Doing any other thing for the purposes of or in connection with the Equality Act 2010.
- Alleging that a person has contravened the Equality Act 2010.

Victimisation may include, for example:

- Denying someone an opportunity because it is suspected that they intend to make a complaint about harassment.
- Excluding someone because they have raised a grievance about harassment.
- Failing to promote someone because they accompanied another staff member to a grievance meeting.
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

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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 their local 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 local HR Team.

Harassment and victimisation are unlawful and will not be tolerated. Particularly serious complaints could lead to disciplinary action being taken up to and including 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 that an employee does not want to take further, the local HR 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 their local 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.

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Third-party harassment

Third-party harassment occurs where a person is harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment. Third-party harassment could include, for example, derogatory comments about a person's age, disability, pregnancy, colour, religion or belief, sex or sexual orientation, by a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment. Third-party harassment can result in legal liability and will not be tolerated. 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 law requires employers to take reasonable steps to prevent sexual harassment by third parties. Although a member of staff cannot bring a claim for third-party harassment alone, it can still result in legal liability for an employer, when raised in other types of claims. All staff are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this Policy.

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 line manager or your local HR Team; and
- being open, honest and objective in any investigation of complaints.

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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; and
- report promptly to the local HR Team 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, Employee Data Protection Policy, Employee Privacy Notice, Equality, Diversity and Inclusion Policy and Grievance Policy. All Severn Group policies can be accessed on the Group Policy Hub.

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