

## Preventing sexual harassment

The Company has a legal duty to take reasonable steps to prevent sexual harassment of the Company's employees in the course of their employment.

Sexual harassment in the course of employment includes sexual harassment by third parties Company employees encounter while doing their jobs, including clients, customers, contractors, visitors and members of the public.

The Company will take a proactive approach to preventing sexual harassment of its staff and prioritise its actions based on its assessment of risks.

All staff who are subject to sexual harassment, or who witness incidents they perceive to be sexual harassment, are encouraged to report these incidents to management.

### Assessment of the risks of sexual harassment

The Company will consider all aspects of its operations and include assessment of the risks of sexual harassment alongside its regular health and safety risk assessments.

The Company has identified the following as priority areas in which its staff face the greatest risk of being subject to sexual harassment:

- a) When working alone;
- b) When visiting customers' or suppliers' premises;
- c) At work-related social events; and/or
- d) When serving customers or suppliers.

### Actions to mitigate risks

There is no "one-size-fits-all" approach to preventing sexual harassment; the actions the Company takes following its risk assessments will be proportionate and appropriate.

Actions may include:

- a) Avoiding lone working where possible;
- b) Use of CCTV to deter and detect incidents;
- c) Customer notices and messages;
- d) Call recording;
- e) Warning and offboarding customers where there are repeated incidents;

The Company will maintain a register of sexual harassment incidents. The Company will regularly review these reports to help it identify and act upon problem or high-risk areas

The Company will ensure all staff receive appropriate training both at the induction stage and regularly during their employment.

Senior management are responsible for the implementation and ongoing review of this policy on preventing sexual harassment.