

Sexual Harassment Policy

1. The Policy Statement

1.1 Alumasc Roofing (The Company) is committed to providing an inclusive, supportive and safe environment for everyone who works for us. This policy applies to all employees.

1.2 The aim of the policy is to prevent, respond to incidents that arise and take action to effect long-term change by:

- Educating all employees about sexual harassment and their role in developing a culture free from harassment;
- Fostering a working environment that supports the dignity and respect of all, and is free from any form of discrimination, bullying, harassment and violence including gender-based violence;
- Where harassment does occur, providing a process and procedure for dealing with it to ensure it is properly managed;
- Building continuous improvement into our culture; and
- Monitoring our progress in achieving a workplace free from harassment

1.3 Everybody has a part to play, in being aware of, preventing and dealing with sexual harassment. The policy sets out our expectations for the behaviour of our employees, as well as, what the Company can do to protect all employees from sexual harassment. This policy is fully supported by the senior management team.

1.4 The Company will not tolerate any form of sexual harassment in the workplace, we will treat all incidents seriously and promptly investigate all allegations of sexual harassment.

1.5 Sexual harassment may be treated as a disciplinary offence. As per the Company's disciplinary policy and procedure the appropriate sanctions including warnings and/or up to and including dismissal. Dependent on the case dismissal may occur with or without notice in accordance. There may also be instances where it is believe that further training is mandated for individuals, teams or the whole Company.

1.6 No one will be victimised for making a complaint of sexual harassment or for helping another person to make such a complaint. No one will be subject to disciplinary action, (unless it's found the concern raised was malicious or foul play) or to any other detriment simply because their complaint was not upheld.

1.7 From 6 April 2026, disclosures relating to sexual harassment may constitute a 'protected disclosure'. Employees and workers who raise such disclosures will be legally protected from detriment or dismissal. The Company will handle such disclosures in accordance with whistleblowing policy.

1.8 The Senior Management team and Managing Director have overall responsibility for this policy. Where the policy requires to be updated to make it more effective, such amendments will be communicated to all employees by the HR Manager.

1.9 This policy does not form part of any contract of employment and may be amended as set out above, all employees will be made aware of this policy and will be expected to comply with it. This policy will be communicated to all employees on a regular basis.

1.10 The following policies should be read in conjunction with this policy:

- Disciplinary & Grievance
- Equal Opportunities
- Bullying and Harassment
- Whistleblowing

2. What is Sexual Harassment?

2.1 Sexual Harassment is prohibited under the Equality Act 2010. It occurs when a person is subjected to unwanted conduct of a sexual nature which has the purpose or the effect of:

- Violating the persons dignity, or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

2.2 Unwanted conduct that has one of these effects can be harassment even if the effect was not intended. A single one-off event or a series of incidents can amount to sexual harassment. A person can be affected by sexual harassment even if the conduct is not targeted at them.

2.3 It is also unlawful to treat someone less favourably because they have either raised a complaint of sexual harassment or that they have rejected such behaviour.

2.4 Anyone can be a victim of sexual harassment, regardless of their sex, sexual orientation or gender identity or that of the harasser. Sexual harassment may also occur between people of the same sex.

2.5 Sexual harassment is often a manifestation of power relationships and frequently occurs within unequal relationships in the workplace.

2.6 The Company recognises that certain vulnerable or minority groups may be more at risk of sexual harassment. Where a person has more than one protected characteristic, this may increase the risk of the experiencing sexual harassment. This is because multiple categories of identity such as gender, race, sexuality, trans status, religion and disability can interact in ways that create complex systems of oppression and power which, can result in harassment based on a combination of different aspects of a person's identity. This is referred to as intersectional harassment.

2.7 What is unwanted conduct?

Unwanted conduct covers a wide range of behaviour which is unwanted or unwelcome, such types of behaviours which constitute as sexual harassment include, but are not limited to the following:

Physical conduct

Unwelcoming physical contact including patting, pinching, stroking, kissing, and hugging
Fondling or inappropriate touching
Physical violence, including sexual assault and rape
The use of job-related threats or solicit sexual favours

Verbal conduct

Banter
Mimicry
Comments about someone's appearance, age private life etc
Sexual comments, stories, jokes or pranks
Sexual advances
Repeated and unwanted social invitations for dates or physical intimacy
Insults based on the employees sex
Condescending or paternalistic remarks
Sending/sharing sexually explicit messages/images by any medium
Coercion

Non Verbal

Display of sexually explicit or suggestive material or images
Acts affecting a person's surrounding
Posts or conduct on social media
Sexually suggestive gestures
Facial expressions
Whistling and leering
Predatory behaviour

2.8 The effect of such behaviour and whether it is unwanted should be considered from the point of view of the person who feels harassed (the recipient).

2.9 There may be other sexual behaviour, which though not unwanted, is still *inappropriate* in the workplace (including in a place that may legally count as work such as at a work event). For example engaging in a consensual sexual act in the workplace. The Company does not permit sexual contact in the workplace and any such behaviour may be addressed as a breach of the sexual harassment policy. The Company recognises that if this behaviour were allowed to take place there is a risk of one party believing that the conduct is welcomed and the other considering the conduct to be unwanted either at the time or in hindsight. This can increase the risk of sexual harassment.

3. How does this policy apply?

This policy applies to all unwanted conduct that occurs in the course of a person's work and which takes place at their workplace, including while working from home, at a client/customer premises, during site visits, at any place of work, if the employee is there for any reasons relating to work, including work related social events, exhibitions, business trips, training sessions or conferences.

4. What if the alleged perpetrator is not a member of staff?

The sexual harassment of staff will not be tolerated, whether caused by those that work within the business or third parties including customers, suppliers, contractors, clients or visitors to our premises. Any instances of work-related sexual harassment should be reported in line with this policy regardless of who the alleged perpetrator is. The Company will act in accordance with the EHRC's Guidance on third party sexual harassment ([Sexual harassment and harassment at work \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/sexual-harassment-and-harassment-at-work)).

5. Preventing sexual harassment

5.1 This section should be read in conjunction with the policies listed above in section 1.9.

5.2 As set out in section 2.4 and 2.5, sexual harassment can be more prevalent in certain environments, including where there are disparities of power between different groups. This is often linked to women and men working at different levels of seniority within the Company, and includes power disparities as a result of disability, sexual orientation, gender identity, race, age and any other protected characteristic as defined by the Equality Act 2010.

5.3 High levels of workplace stress can be a contributory factor in creating a working environment in which sexual harassment is more likely to occur. Stress occurs where there is either excessive demand on employees and/or reduced resources. It can arise due to excessive working hours and limited recovery time, work precarity, high levels of employee absence/sickness and turnover that leave remaining employees to have to pick additional tasks. In these contexts ability to self-regulate can be overwhelmed to create hot spots of more pervasive workplace incivility including raised levels of bullying, harassment, of which sexual harassment is an extreme outcome.

5.4 Employers duty of care

5.4.1 The law imposes a duty of care on employers to provide a safe system of work for all employees. This includes a specific obligation to protect the health, safety and welfare of our employees and others who may be affected. In discharging this legal duty the Company recognises that there are certain measures that can help to prevent sexual harassment in the workplace including ensuring that adequate measures are in place to tackle sexism and address inequality as well as other forms of discrimination.

6. Responsibilities of managers and Senior Management Team

6.1 All those with line management responsibility must ensure that all employees are aware of this policy and understand their own, and the company's responsibilities.

6.2 Managers have a particular duty to ensure that within their area of responsibility everyone is treated with dignity and respect.

6.3 To discharge this duty; managers must:

- Challenge any unacceptable or questionable behaviour that they become aware of even if they are not directly affected.
- Be aware of behaviour and language that can cause offence including jokes, banter and if necessary remind employees of the standards the Company expects
- Respond to complaints of sexual harassment swiftly, sensitively and objectively using specific procedures as outlined in this policy
- Ensuring that they fully understand the complaint and what has happened and address the complaint proportionately
- Deal directly with perpetrators, outlining actions which may include withdrawing service, terminating a contract, banning of third party personnel etc if behaviour is not moderated.
- Ensure that this policy is followed fully.

6.4 The HR manager will assist the line manager in dealing with complaints of sexual harassment.

6.5 All complaints of a sexual harassment must be dealt with in accordance to the Company's data protection policies and legislation.

6.6 Managers are expected to be exemplars to others; any inappropriate behaviour or response to such behaviour or abuse of a managers positional power will serve to condone harassment and will be considered a serious breach of this policy and be managed under the disciplinary policy.

6.7 A Managers failure to actively implement this policy within their area of responsibility, or to fail to deal with sexual harassment concerns/complaints when they become aware of a situation could constitute a breach of this policy and disciplinary action may be taken.

7. HR Manager's Responsibility

7.1 The company recognises that it can be difficult for employees to report sexual harassment. The company is committed to ensuring that such difficulties are overcome so that allegations of sexual harassment can be raised and acted upon. To aid in this endeavour the HR Manager has been designated to deal with complaints of sexual harassment and to offer advice to employees who believe that they or their colleagues have experienced sexual harassment.

7.2 The HR Manager will provide empathic assistance and support to employees with complaints and explain the procedures, for next steps and potential outcomes as required.

8. Responsibility of Employees

8.1 All employees have a responsibility to contribute to a respectful and productive working environment. All employees have a duty to assist in the creation of a safe working environment where sexual harassment is not tolerated.

8.2. To discharge this duty, employees must:

- Ensure they understand what sexual harassment is,
- Be aware of how their behaviour may affect others,
- Challenge unacceptable behaviour where possible as long as it is safe to do so,
- Report incidents of sexual harassment when witnessed and/or support recipients of sexual harassment in reporting it, and
- Cooperate in investigations into alleged sexual harassment.

8.3 If you have or you are concerned that you have engaged in unwanted conduct of a sexual nature (intentionally or otherwise) you should take responsibility for your actions as soon as possible and speak to the HR Manager, your line manager or a member of the senior management team.

8.4 If, at any time you are asked (verbally or in writing) by someone who considers your behaviour to amount to sexual harassment to stop, you must not persist in that behaviour. You should also report the incident to your manager or the HR Manager. In such circumstances it is important that you reflect on your behaviour and the way in which it is perceived and experienced by others. Everyone has the right to decide what behaviour is acceptable to them and to have their feelings respected by others. You should be sensitive to the reaction/potential reactions of the recipient.

8.5 If you are the recipient of unwanted conduct of a sexual nature. You can report any concerns to your manager or the HR Manager. In some cases you may feel able to ask the perpetrator to stop the behaviour. If that is ineffective or you do not feel able to do this, requesting an informal discussion with your line manager or HR Manager can be a useful way of talking through what has happened and deciding what further action you may wish to take. If the harassment is of a serious nature because of the high immediate risk to others, the company may need to take immediate action.

8.6 Recipients of sexual harassment are encouraged to report any instances. Reporting is an important step in preventing the behaviour and is important to the wellbeing of the recipient. However the Company recognises that there may be many reasons for someone who has experienced sexual harassment not report it, and the Company is committed to making it easier and less stressful to do so.

8.7 If you have witnessed any unwanted conduct of a sexual nature you can still raise a concern or make a complaint. If you see it happening or become aware of it taking place, you should report it immediately to your line manager or the HR Manager.

9. Reporting mechanisms

9.1 It is important that any concerns are reported as you may be the first to formally raise something that has been occurring for some time.

9.2 The Company retains the right to investigate concerns that we become aware of even if these are based on anonymous reporting or complaints are withdrawn. The Company's ability to investigate and take action may be restricted in these circumstances, but the Company will act with respect and empathy towards any person who has raised a concern but no longer wishes to be involved in the process. The Company may still pursue matters if it is appropriate and proportionate to do so. This is important to ensure that we take concerns about potential sexual harassment within the Company.

9.3 From April 2026, any disclosure relating to sexual harassment may qualify as a protected disclosure. Where a concern meets the legal criteria of a protected disclosure, the individual raising it will receive statutory whistleblowing protections, including protection against detriment and unfair dismissal. The Company will ensure that no confidentiality clauses, agreement or NDA will prevent or appear to prevent a worker from making such a disclosure.

9.4 Informal reporting

9.4.1 If a person reports sexual harassment to their manager or the HR Manager, but does not want to take the matter any further, the individual receiving the complaint will keep in contact with the employee periodically to check whether the situation has improved.

The Company acknowledges that from April 2026, a formal report of sexual harassment may also constitute a protected disclosure under whistleblowing legislation. In such cases the complainant will be afforded statutory protection regardless of whether the concern is raised formally, informally or through the whistleblowing route.

9.4.2 Where ever possible the company will adhere to the wishes of the complainant to keep the report on an informal footing. However there may be some circumstances where the harassment is of such a serious nature that the Company will need to take action because of the immediate risk to the safety of the complainant or others, with whom the perpetrator may come into contact with. In such situations the Company will put into place appropriate safeguards, such as instigating a formal investigation with suspension, or limit any interaction with the alleged perpetrator to prevent any further harassment, or victimisation of the complainant.

9.5 Formal reporting

9.5.1 If informal action does not stop the sexual harassment or a formal report is made, a formal procedure will be initiated in line with the grievance process as outline in the Company's Grievance Policy.

9.5.2 The process allows both the complainant and the alleged perpetrator to be accompanied by a trade union representative or a work colleague.

9.5.3 A person who believes that they have been sexually harassed and who decides to formally report it, should in the first instance report the alleged act or acts to their line manager. If they do not feel that their line manager is the appropriate person, then the report should be

made to either the HR Manager or a member of the senior management team. Where possible the complaint should be set out in writing, including dates and times of the alleged incident(s) and an account of the unwanted behaviour. You should also include (where possible) what your desired outcome is from the formal process.

9.5.4 All complains will be handled and investigated in a timely and confidential manner. The complainant will be invited to a meeting with the person to whom the complaint is made to, within 5 working days of reporting the alleged act or acts. The employee has the right to be accompanied at this meeting as outlined above (section 9.4.2). Following this initial meeting the person whom the complaint is made will investigate the complaint.

9.6 The Investigation

9.6.1 The first stage in investigating the complaint, the investigator will arrange to interview the complainant and the alleged perpetrator. The company recognises that the complainant may prefer to talk to an investigator of the same sex and this will be facilitated wherever possible.

9.6.2 Managing a complaint under this policy will mirror the structure of the Company's Grievance process while also recognising the unique issues and skillsets that may be needed to properly manage a sexual harassment complaint.

9.6.3 The investigator will hold the same role as the grievance chairperson. Their remit will be to:

- (i) investigate the complaint
- (ii) provide an outcome to the complainant; and
- (iii) where appropriate make a recommendation as to whether the matter should be referred to a disciplinary process centred around the alleged perpetrator.

The Company's default approach is for the person investigating the concern, to decide on the outcome of the complaint because they will have first-hand understanding of all the information and have spoken to all witnesses. However, the person raising the complaint under this policy will have the option of requesting that a separate person be appointed for stages (ii) and (iii) above. This request should be made at the beginning of the process when the concern is raised. The company will then discuss the impact of that request and the change in process, where possible this request will be accommodated unless it is unreasonable to do so.

If disciplinary action is the outcome of the investigation this will be handled under the Company's Disciplinary process. The investigation carried out under this policy will form part of the disciplinary investigation. An independent manager will always be appointed as the Disciplinary Chairperson. The disciplinary chairperson will be responsible for satisfying themselves that a reasonable investigation has been carried out for the purposes of the disciplinary matter that they are tasked with considering. As part of the disciplinary action the chairperson may wish to speak to certain witnesses including the person who raised the complaint first hand to gain a fuller understanding of their evidence. The Disciplinary will be a fair process whilst remaining mindful of minimising the circumstances in which a complainant is required to re-tell their account.

9.6.4 Where possible a timeline for completion of the investigation will be set out and communicated, along with regular updates on progress. The Company will also explain when information may be shared with an alleged perpetrator to ensure that they are not surprised at any stage in the process.

9.6.5 If the sexual harassment constitutes a potential criminal offence, such as sexual assault, indecent exposure, the complainant will be provided with appropriate support. Should the complainant wish to report the matter to the police. In such cases, the Company will liaise with the police regarding the investigation and any linked grievance and/or disciplinary process and take advice on how to conduct a fair process. Where there is an ongoing risk of serious harm to an individual the investigator may contact the police directly and inform the complainant that they have done so. The company may choose to begin liaising with the police on an anonymous/no names basis for high level guidance where appropriate.

9.6.6 The company recognises that when a workplace matter is also subject of potential criminal investigation, the alleged perpetrator may be seeking independent legal advice, and as part of that may be advised not to participate in the internal work process as this could impact upon criminal proceedings. The company will not draw any adverse inference from the lack of participation in the process for this reason. However the Company may still need to progress matters and take a decision on next steps based on the information available to them.

9.6.7 The Company will ensure that the complainant and the alleged perpetrator are not required to work together while the complaint is under investigation. In a serious case, as a precautionary measure for the protection of the complainant or to prevent interference in the investigation, the alleged perpetrator may be suspended while investigation and subsequent disciplinary procedures are undertaken. Such suspension will be for as short a time as possible and will be on full pay and benefits. Suspension will not automatically mean that the alleged perpetrator has acted in an unwanted manner.

9.6.8 If the outcome of the complaint is that the matter will proceed to a disciplinary process, the complainant will be advised of this outcome. However they will not have the right to know what the outcome of the disciplinary procedure is or if any sanctions have been imposed. The company recognises that this may be incredibly frustrating, however we have a duty towards all employees and must respect the confidentiality of our employees who are subject to disciplinary proceedings.

9.6.9 Where the complaint is not upheld or proceeds to a disciplinary process under which the outcome involves the alleged perpetrator remaining with the Company, the disciplinary outcome will include the option of a facilitated reconciliation meeting at which the perpetrator will be required to attend and the complainant will have the option to attend at their discretion. Support will be made available to all parties involved. The aim will be to understand and re-build professional relationships where possible, failing which to provide closure as far as possible and enable the company to learn and move forward.

9.7 Outcome and sanctions for committing sexual harassment

9.7.1 In some cases the outcome of a complaint under this procedure may be an informal resolution. If this is the case the information will be provided to the complainant and the alleged perpetrator(s). There will be support provided in dealing with the outcome.

9.7.2 If a complaint of sexual harassment is upheld then it may progress to a disciplinary process. The disciplinary process will follow the sanctions per the Company's Disciplinary Policy.

9.7.3 Any decisions taken under this procedure do not preclude anyone from pursuing a grievance in the usual way under the Company's grievance policy; although, in some cases the Company believes that it is more appropriate for the matter to be addressed under this policy. An individual may also report the matter to the police if they believe that a criminal offence may have been committed.

9.8 Right to Appeal

9.8.1 The complainant has a right to appeal against the decision following the investigation decision.

9.8.2 Any appeal must be made in writing, stating the reasons for appeal within 5 working days of receiving a formal decision.

9.8.3 On receipt of an appeal, a meeting will be arranged with a more senior manager who has not been previously involved in the procedure to consider the appeal. The complainant will be given the opportunity to put forward their case and explain why they are not satisfied with the original outcome. The meeting may be adjourned, if it is felt by the appeals manager that further investigation is required.

9.8.4 The decision of the appeal will be final.

9.8.5 If disciplinary action is taken against an individual as a result of sexual harassment then they have the right to appeal as set out in the company's disciplinary policy.

10 Protection from Victimisation

All employees shall be protected from intimidation, victimisation or discrimination for making a complaint of sexual harassment or for assisting in an investigation. Retaliating against an employee for complaining about or assisting in an investigation of sexual harassment is a disciplinary offence.

11 Management of legal disputes connected to sexual harassment

11.1 In the event of a legal dispute connected to sexual harassment, the Company commits to managing such matters appropriately, fairly and with empathy. We recognise that for some individuals the formal court and tribunal process can be stressful. As such we commit to always being open to alternative dispute resolutions where this is requested by a person who alleges that they have been sexually harassed.

12 Review and evaluation of policy

12.1 The company is committed to ensuring that this policy and all related procedures are effective in preventing sexual harassment and in dealing with incidents where they do occur.

12.2 This policy will be reviewed annually and may be updated from time to time. Any changes to the policy will be outlined before being enforced.

13 Support for those affected by sexual harassment

13.1 We recognised that sexual harassment can cause stress, anxiety or other mental health as well as physical health problems. Deterioration in job performance which results from sexual harassment will be dealt with as a health related issue and the person will be encouraged to seek help and support.

13.2 There will be no discrimination against employees suffering from stress caused by sexual harassment.

13.3 The Company recognises that those who may be accused of sexual harassment, witnesses to incidents or otherwise affected, can experience stress, anxiety or mental and physical health problems. As a Company we have a duty of care to support all employees affected by these issues.

The Company also acknowledges that where an individual is accused of sexual harassment, any disclosure they make relating to sexual harassment (including systemic issues) may qualify as a protected disclosure from April 2026 and will be treated in accordance with whistleblowing legislation.

14 Use of language

Language used when discussing sexual harassment is important. The Company recognises that this is a sensitive subject and individuals may have different reactions to certain words and terminology. While the company has used the terms 'alleged perpetrator' and 'complainant/complainant' in this policy; when managing any complaint of sexual harassment we will be mindful of the language used. The company will therefore seek to use neutral terms such as individual names, initials or 'employee A' rather than referring to people as the complainant/complainant or the alleged perpetrator/accused. We will not use the term victim to describe the employee who raises a complaint about sexual harassment.

If at any time there are concerns over terminology used, please raise this promptly so that agreed language can be identified and used in the process going forward.

15. Non-Disclosure Agreements (NDAs) and Confidentiality Clauses

15.1 In line with forthcoming legislative changes the Company recognises that any contractual clauses, NDA settlement agreement or confidentiality statements that seeks to restrict or prevent employees from raising concerns or making disclosures about sexual harassment will be void.



15.2 Employees will always retain the right to make a protected disclosure about sexual harassment, regardless of any confidentiality obligations they may have signed.

15.3 The Company will ensure that all agreements, templates and HR documentation reflect his legal requirement and will not include wording that may mislead employees about their right to disclose harassment concerns.