

Anti-Harassment, Discrimination and Bullying Policy

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1.0 General Introduction

Robert Walters plc and its subsidiaries (“Robert Walters”) is committed to creating a safe and inclusive workplace, where all employees are treated with respect, free from discrimination, bullying and harassment and where people can contribute fully and enjoy equal opportunities. We aim to provide a working environment that enables our people to bring their true selves to work, every day and that actively promotes a place they feel they belong.

Our commitment to inclusion reaches across many dimensions, including gender, age, cultural background, race, colour, ethnicity, disability, neurodiversity, religion, sexuality, gender identity, civil status, and other forms of human diversity.

This Policy consists of a set of general principles of anti-discrimination, anti-bullying and anti-harassment to provide an overview of expectations and requirements for all employees to ensure this Policy is upheld across Robert Walters.

As part of a holistic approach this policy complements our Equity, Diversity & Inclusion Policy.

1.1 Purpose

The purpose of this policy is to provide clarity to the arrangements implemented by Robert Walters to prevent unwanted or unlawful harassment, discrimination, or bullying in any form.

1.2 Objectives

1. Maintain compliance with all relevant legal, regulatory and contractual requirements within the countries that we operate.
2. Provide a reference document for training purposes.
3. Provide guidance for best practice.

1.3 Scope

This policy should be applied to:

- All areas of operations of Robert Walters
- All staff employed both permanent and contracted and candidates visiting Robert Walters premises
- The policy applies at all times, including when you are working outside your usual workplace, travelling for work, at work related functions, during social events (including the end of year celebrations), during and on work trips/travel, when you are with clients, customers, partners, and suppliers, when you are communicating with your colleagues and/or third parties, and when you are engaging in social media activities.

1.4 Principles

This policy will be subject to review under the following circumstances:

- As part of an annual policy review process
- Following change in regulation (in local countries as required)
- Following an issue (such as a complaint relating to harassment)
- On request by a Board member

1.5 Integration with Other Documents

This policy should be read in conjunction with the following documents:

- Code of Conduct (RWGHRP034)
- Equity, Diversity & Inclusion Policy (RWHRP003)
- Disciplinary and Performance Review Policy (RWHR007)
- Local Bullying, Harassment and Discrimination Policies
- Raising Serious Concerns at Work Policy (RWGLEP004)
- Systems Use Policy (RWGISP000)

2.0 Responsibility for This Policy

2.1 Robert Walters & The Board of Directors

- Robert Walters has a responsibility to investigate complaints of unlawful harassment, discrimination or bullying made against or by any employee or candidate. Where harassment, discrimination or bullying is shown to have taken place it will be dealt with under the Disciplinary and Performance Review Policy as a form of misconduct. In some cases, it may be treated as gross misconduct leading to summary dismissal of those responsible.
- The Board of Directors has overall responsibility for this policy but has delegated day-to-day responsibility for overseeing its implementation to the Human Resources Team.

2.2 Manager Responsibilities

Managers have a specific responsibility to operate within the boundaries of this policy and to facilitate its operation by ensuring that:

- Employees understand the standards of behaviour expected of them and by identifying and acting upon behaviour that falls below these standards.
- They have an understanding that bullying, discrimination, or harassment of any sort will not be condoned or tolerated by Robert Walters.
- Managers are additionally required to provide leadership and role-modelling in appropriate professional behaviour, including by ensuring all their direct reports are aware of this Policy and related policies.

2.3 Employees Responsibilities

All employees have a responsibility to behave in ways which support an inclusive and positive working environment. You should play your part in making the policy a reality and have responsibility under this policy to eliminate harassment, discrimination, and bullying. We expect all employees to strive for the highest standards of integrity and accountability and to conduct themselves in line with our Code of Conduct and this Anti-Harassment, Discrimination and Bullying Policy.

What one person considers harassment or sexual harassment, may not be considered harassment or sexual harassment by another. It is therefore up to each employee where possible to make it clear when conduct is unwanted.

In this context, you must:

- Not engage in any unwelcome behaviour or conduct of a sexual nature with another work colleague, client, candidate, temporary worker, contractor, or visitor.
- Consider your words and actions and how they might impact others.
- Adhere to the behavioural expectations set out in the Robert Walters Code of Conduct, including treating others with dignity, courtesy, and respect.
- Speak up and report to the appropriate channels any concerns they witness or become aware of regarding sexual harassment in the workplace.

3.0 Definitions

Discrimination

Discrimination is any negative action or attitude toward someone because of personal characteristics, such as but not limited to nationality, race, colour, gender, age, religion, political beliefs, sexual orientation, disability, physical or mental disability, protected military or veteran status, social background or education, marital status, or family responsibilities. Discrimination occurs when an employee is treated less favourably than others without reasonable cause due to anything that is protected by discrimination legislation.

See [Annex 1](#) for some examples of discrimination.

Harassment

Harassment is a type of discrimination. Harassment can occur when an individual at the workplace demonstrates behaviour that causes or is likely to cause alarm or distress to another person. Such behaviour violates a person's dignity or creates an unfavourable work environment for that person. Harassment can occur based on any of the grounds of discrimination.

In certain cases, a single incident of unwanted or offensive behaviour towards one individual can amount to harassment.

Sexual Harassment

Sexual harassment is a specific and serious form of harassment. It is the conduct of a sexual nature that is unwanted by the person to whom it is directed including unwanted sexual advances and requests for sexual favours. Sexual harassment may occur between persons of the opposite or same sex. Both men and women can be either the victims or the offenders. Depending on the country, sexual harassment can be punished by law, therefore reporting to local authorities may be required.

See [Annex 2](#) for examples of harassment and sexual harassment.

Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour or an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient.

Cyber Bullying

Cyber bullying has become more important to understand with many employees working from home and interaction taking place more online. Cyber bullying is any form of harassment or bullying that takes place online or through the use of electronic devices.

It can take a number of different forms: threats and intimidation, harassment or 'cyber-stalking' (e.g., repeatedly sending unwanted texts or instant messages), vilification/defamation, exclusion/peer rejection, impersonation, unauthorised publication of private information/images and 'trolling' (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

See [Annex 3](#) for examples of Bullying and Cyber Bullying.

4.0 Performance Management

If your manager's giving you work to do, making reasonable requests, providing you with constructive feedback or managing your performance using an informal or formal process - and they're doing that in a professional and supportive way - this won't on its own be considered bullying. But if you do feel that your manager's behaviour towards you is unacceptable, talk to them about it. If you feel like you can't do this, there are other ways you can raise your concerns – see 'Making a formal complaint'.

5.0 Behaviour Outside of Work

If you experience unwanted or offensive behaviour that happens outside of the workplace but still to do with your work, like at a work-related social event or training course, we encourage you to try and resolve it within the informal stage of this policy. However, if you feel that is not appropriate you can tell your manager or contact your local Human Resources Team. They'll investigate and deal with it in line with this policy.

6.0 Informal Complaints

If you experience, observe or suspect that conduct prohibited by this policy has occurred, you should take one or more of the following steps:

Dealing with the matter yourself

We hope that in many cases, staff will feel comfortable to resolve the matter informally. If you feel that you have been bullied or subjected to unlawful harassment, you may initially wish to attempt to resolve the matter informally with the person responsible by explaining to them that their behaviour is not welcome or makes you uncomfortable. It may be that the person whose conduct is causing offence is genuinely unaware that their behaviour is unwelcome or objectionable. If you feel unable to approach the person whose actions or conduct is causing offence, the complaint can be raised informally with your manager or Human Resources Team who will try to assist you in finding an informal solution to the problem.

If you are not certain whether an incident or series of incidents amounts to bullying or harassment you should initially contact your line manager or Human Resources Team informally for confidential advice.

If informal steps have not been successful or are not possible or appropriate, you should follow the formal procedure.

Reporting to management

If you feel you have been or are being subjected to conduct that violates this policy, you should bring it to the attention of your manager, or your senior manager if it is about your manager.

Reporting to your local Human Resources Team

If you do not feel comfortable raising with a manager or senior manager, you can contact your local Human Resources Team on an informal basis. They will be able to advise you how your concerns should be dealt with.

Mediation

Mediation may be offered as a solution to address perceived bullying, harassment, and discrimination issues, although each situation needs to be judged on a case-by-case basis, as serious cases of bullying and harassment, and clear cases of discrimination, may need to be dealt with by more formal procedures. Information on mediation is available in the Global Policy Library including an up-to-date list of mediators.

7.0 Formal Complaints

You have the option to raise the matter formally through your local Human Resources Team, whose role will be to achieve a solution wherever possible. If the matter concerns a member of the Human Resources Team, you should refer it to Robert Walters Legal Counsel.

If you need to file a formal complaint, you should follow your local grievance policy or applicable policy that is relevant to your complaint. Your local Human Resource Team can advise you on what policy is applicable if you are unsure.

If, following an investigation, it is deemed there is a case to answer, appropriate disciplinary actions will be undertaken in accordance with the severity of the discrimination, bullying or harassment issue.

Robert Walters may commence proceedings under local applicable policies against any person whom we consider may have breached this Policy. Such proceedings may lead to disciplinary sanctions up to and including termination of employment.

8.0 Victimisation

Victimisation is defined as the less favourable treatment of a person because they have, in good faith, made allegations of harassment; intend to make such an allegation, or have assisted or supported a person in bringing an allegation.

Examples of victimisation include labelling an individual, as a 'troublemaker' or treating them in any way less favourably because of their actions. Retaliation against an employee for complaining about harassment or bullying is not acceptable.

Protection and emotional support for employees under this procedure

Any employee making a complaint or assisting in an investigation shall be offered appropriate support.

Any employee who makes a complaint or who participates in any investigation conducted under this policy in good faith will be protected from any victimisation as a result of their involvement.

If you consider that you have been subjected to intimidation or victimisation as a result of your involvement with a complaint under this procedure, then you should notify your local Human Resources Team immediately.

Any employee who is found to have provided false information or to have acted in bad faith will be subject to disciplinary action under the locally applicable policy, up to and including termination of employment which may include notice or pay in lieu of notice (if locally applicable).

9.0 Emotional Support

We know that experiencing inappropriate behaviour can make working life miserable and take an emotional, physical, and mental toll. We also know that it can be helpful to be able to get confidential emotional support from someone impartial and from outside any formal process. Your local Employee Assistance Programme is available if you need someone to talk to you.

10.0 Confidentiality

The points below set out our approach to confidentiality, but may need to adapt based on local legislation, including employment or data protection and/or if legal proceedings require it.

1. If you make a complaint under this procedure, your name and the name of the person that is the subject of your complaint, will not be divulged other than on a strictly "need to know" basis to those individuals involved in the investigation.
2. All employees involved in the operation of the policy, whether making a complaint or involved in any investigation, are responsible for observing the high level of confidentiality that is required.
3. Robert Walters may subject anyone who is found to have breached this requirement of confidentiality to disciplinary action under the locally applicable policy.

4. Limitations of Confidentiality

Only in exceptional cases should an individual raising a complaint request to retain complete confidentiality through a complaint process. Maintaining confidentiality can present challenges, and it can limit the actions that HR can take to help employees with their complaints when reporting under this procedure. There may also be circumstances where there are legal or safeguarding reasons that require HR to share information with another party.

This policy is for guidance only and does not form part of employees' terms and conditions of employment.

Robert Walters reserves the right to amend this policy from time to time, omit stages of the process or apply such other procedure as, in its absolute discretion, it deems appropriate in the circumstances.

If you have any questions or queries on the above information, please contact the Human Resources Team.

Annex 1

Examples of detriments that may be related to Discrimination include:

- Job refusal
- Being dismissed or having hours cut down
- Denial of training opportunities, transfers and promotions
- Not being paid the same as someone doing the same job with the same experience and qualifications
- Exclusion or isolation by co-workers
- Having information you need to do your job deliberately withheld
- Being given impossible tasks/objectives set
- Being subjected to taunts or abuse that references the protected attribute

This list is non-exhaustive and there may be other examples under applicable laws.

Annex 2

Examples of harassment may include:

- Ongoing “banter” focused on gender, gender re-assignment, pregnancy, race, nationality, religion, belief, political opinion, sexual orientation, marital status, disability, age or any other characteristic protected by law that the recipient reasonably deems to be offensive
- Written or graphic material that denigrates or shows hostility toward an individual or group
- Offensive language, gossip, slander, sectarian songs and letters relating to a characteristic protected by law
- Derogatory or insensitive jokes, pranks, or comments
- Comments that ridicule or stereotype people
- Using sarcasm to belittle others
- Racial slurs, derogatory remarks about a person’s accent,
- Display of racially offensive symbols
- Unwanted and inappropriate physical contact including touching, pinching, pushing, grabbing, unnecessarily brushing up against someone, invading personal space, and physical assault
- Innuendos or veiled threats
- Sabotaging a person’s work, or deprivation of working tools
- Degradation of professional or personal stuff
- Deliberately excluding someone from meetings or communications without a business justification
- Creation of arbitrary standards for one person, imposing unrealistic demands, or using supervision to intimidate a person
- Displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory and inappropriate
- “Outing” (or threatening to “out”) someone’s sexual orientation or gender identity, and deliberate misgendering
- Offensive comments about appearance, or other personal or physical characteristics
- Intimidating acts, such as bullying or threatening physical assault
- Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual.

Examples of sexual harassment may include:

- Unwanted sexual attention;
- Subjecting employees or clients or third parties to insults, innuendos or degrading comments that make them feel uncomfortable because of their gender, including making these comments by e-mail;
- Displaying sexually suggestive pictures in the workplace;
- Over-familiar behaviour, including lewd and suggestive remarks; and
- Suggesting that sexual favours may further someone's career or that the refusal of sexual favours may in some way damage their career.
- Actual or attempted sexual assault.
- Unwelcome physical contact.
- Staring or leering.
- Suggestive comments or jokes.
- Sharing sexually explicit pictures, posters, conversations, emails, or SMS text messages.
- Persistent unwanted invitations for dates.
- Requests for sex or sexual favours.
- Intrusive questions about a person's private life or body; and/or
- Insults or taunts based on sex

Annex 3

Examples of bullying may include:

- Copying emails or other written correspondence or material that are critical about someone to others who do not need to know;
- Ridiculing or demeaning someone;
- Overbearing supervision or misuse of power or position;
- Making threats or comments about job security without foundation;
- Deliberately undermining a competent worker by overloading and constantly criticising;
- Preventing an individual's progress by intentionally blocking promotion or training opportunities for malicious reasons; and
- "Dressing down" a subordinate in front of their colleagues
- Isolation or exclusion from social activities

Examples of cyber bullying may include:

- Sending offensive or threatening emails
- Posting or sharing false, negative, or harmful content about someone online
- Spreading lies and malicious gossip online
- Digital impersonation or creating a false identity or fake online profile using the target's image and photos