

UK - Bullying, Harassment and Sexual Harassment Procedure

Purpose and Scope

This procedure defines Wood’s commitment to providing a working environment which is free from bullying, harassment and sexual harassment in which workers treat each other with mutual care, respect and dignity. Wood will take appropriate steps to address allegations of bullying, harassment or sexual harassment and will ensure that reporters are not retaliated against or victimised as a result of raising any allegation or complaint.

This procedure applies to all “workers” of Wood in the United Kingdom. This procedure shall apply to the extended workplace which includes remote and/or hybrid workers as well as events that occur outside of the physical workplace such as business trips, work social events or other work-related functions.

Failure to comply with this procedure may lead to serious financial and reputational implications for Wood and disciplinary action for individuals.

The Company reserves the right to amend this procedure at any time.

Applicability - United Kingdom

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1.0 Key Roles and Responsibilities

1.1 Workers

- Ensure they treat other workers with mutual care, respect and dignity at all times.
- Speak up by raising any concerns as early as possible and in line with the requirements outlined in this procedure.
- Treat, in a confidential manner, information communicated to them in connection with investigation or grievance matters.

1.2 Managers

- Must be aware of their responsibilities under this procedure, ensuring that they extend fair and equal treatment to all workers and that all relevant parties are heard.
- Explain the Company's procedure to workers and to take steps to positively promote the procedure.
- Intervene quickly and appropriately, working in conjunction with local HR representatives, when they become aware of any concerns.
- Protect anyone from retaliation who raises a good faith concern or participates in an investigation.
- Must proactively consider situations where workers may be more at risk of bullying, harassment and sexual harassment and take all reasonable steps to reduce any risks, inclusive of actions of any third parties.
- Maintain confidentiality throughout the process.

1.3 Human Resources (HR)

- Must provide advice and guidance to workers and managers on the application and interpretation of this procedure.
- Must ensure that they extend fair and equal treatment to all workers in relation to the application of this procedure.
- Support managers to fully investigate claims of bullying, harassment or sexual harassment.
- Maintain confidentiality throughout the process.

2.0 Bullying, Harassment and Sexual Harassment

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;
- religion or belief;
- sexual orientation; and
- age.

Although pregnancy and maternity and marriage and civil partnership are not specifically protected under the legal provisions on harassment, we consider harassment on any ground to be unacceptable.

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2.1 Definitions

2.1.1 Bullying

Bullying is conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient. Bullying is not necessarily face to face and can be done by email, phone calls, online (cyber-bullying) or on social media. It can be either physical, verbal or non-verbal conduct and can occur inside or outside of work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

While this is not an exhaustive list, bullying may include:

- Verbal abuse.
- Intimidating or aggressive behaviour.
- Excessive teasing or humiliation.
- Imposing unrealistic targets inducing ridicule or personal embarrassment.
- Unfair and excessive criticism, possibly in front of colleagues.
- Isolating or openly ignoring someone.
- Physical assault.
- Sending abusive or intimidating messages.

It is important to understand that legitimate, reasonable and constructive criticism of a person's performance or behaviour, or reasonable instructions given to people in the course of their employment, will not of themselves amount to bullying.

2.1.2 Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Harassment can occur where someone perceives another person to have a protected characteristic, for example a perception that someone is transgender even if they are not. Harassment can also arise by association, where someone is harassed because they are associated with someone with a protected characteristic, for example having a family member of a particular religion.

Harassment can occur in many forms, and can take place either at work, outside of work, in person, or online.

While this is not an exhaustive list, examples include:

- "banter", jokes, taunts or insults that are sexist, racist, ageist, transphobic, homophobic or derogatory against any other protected characteristic;
- unwanted physical behaviour, for example, pushing or grabbing;
- excluding someone from a conversation or a social event or marginalising them from the group;
- derogatory comments about pregnancy, maternity leave or IVF treatment;
- mimicking or making fun of someone's disability;
- derogatory or offensive comments about religion;
- unwelcome comments about someone's appearance or the way they dress that is related to a protected characteristic;
- "outing" (i.e. revealing their sexual orientation against their wishes), or threatening to "out", someone;
- consistently using the wrong names and pronouns following the transition of a person's gender identity;

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- displaying images that are racially offensive; and
- excluding or making derogatory comments about someone because of a perceived protected characteristic, or because they are associated with someone with a protected characteristic.

It is the impact of the conduct on the recipient and not the intention of the alleged worker which will determine what constitutes harassment.

2.2 Sexual Harassment

Sexual harassment is conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. It can also be less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

Employers are legally obliged to take all reasonable steps to prevent sexual harassment of their workers in the course of their employment and by third parties.

Sexual harassment can occur in many forms, and can take place either at work, outside of work, in person, or online.

While this is not an exhaustive list, examples include:

- physical conduct of a sexual nature, unwelcome physical contact or intimidation;
- persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions;
- showing or sending offensive or pornographic material by any means (e.g. by text, video clip, email or by posting on the internet or social media);
- unwelcome sexual advances, propositions, suggestive remarks, or gender-related insults;
- offensive comments about appearance or dress, innuendo or lewd comments;
- leering, whistling or making sexually suggestive gestures; and
- gossip and speculation about someone's sexual orientation or transgender status, including spreading malicious rumours.

2.3 Reporting a Complaint

2.3.1 Wood Speak Up Resources

Wood's "Speak Up" culture promotes an "open door" atmosphere by encouraging initial discussions of issues with managers.

If you feel you need to speak up about bullying, harassment or sexual harassment that you have been subjected to or have witnessed, the guidance is to raise this through one of the following avenues:

- your manager; or
- another manager in the business; or
- your local HR representative; or
- Wood Legal, Ethics & Compliance; or
- the Ethics Helpline (<https://woodplc.ethicspoint.com>).

Please remember, this is only guidance and above all, you should take the course of action that you feel comfortable taking.

Managers who are notified by a worker of any allegation of bullying, harassment or sexual harassment should notify their local HR representative prior to taking any action.

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2.3.2 Informal Resolution

If you consider yourself to be the victim of bullying, harassment or sexual harassment you can seek confidential informal advice and support from your manager or local HR representative.

In certain instances, it may be appropriate for you to approach the alleged worker personally indicating that a particular action is regarded as offensive. You should discuss with the alleged worker that the behaviour should stop. If the behaviour by the worker continues, you can raise a formal complaint through Wood's Speak Up resources.

Alternatively, you can request that your local HR representative or manager speak to the alleged worker informally. They would indicate to the alleged worker that there has been a complaint raised and that their behaviour is having an adverse effect on a fellow worker. They will also be advised that any such behaviour contrary to this procedure and if substantiated, will amount to disciplinary action in line with the UK & Republic of Ireland Disciplinary Procedure.

Bullying, harassment and sexual harassment by third parties, such as customers, clients, suppliers and/or subcontractors, will not be tolerated.

2.3.3 Formal Resolution

At all times, whether or not informal steps have been taken, if you feel that you have been subjected to bullying, harassment or sexual harassment you can raise a formal complaint. Due to the sensitivities of such complaints, the complaint can be raised through any of the Wood Speak Up resources. The following information should be provided:

- The name of the alleged worker and the nature of the complaint.
- The dates and times the bullying/harassment/sexual harassment occurred and the names of any witnesses (if applicable).
- Any action taken by the reporter to resolve the matter informally (if applicable).

Every effort will be made to address your concern within a reasonable time period from receipt of the complaint in line with the UK & Republic of Ireland Grievance Procedure.

If you decide to not take the formal complaint any further after consideration, the HR representative may seek to resolve the matter informally by indicating to the alleged worker that there has been a complaint and that their behaviour is having an adverse effect on another worker. They will also be advised that any such behaviour is contrary to this procedure and if substantiated, will amount to disciplinary action in line with the UK & Republic of Ireland Disciplinary Procedure.

2.4 Employee Assistance Programme (EAP)

We understand that anyone affected by, or involved with, a complaint of bullying, harassment or sexual harassment may feel anxious or upset. Support is provided through the Wood Employee Assistance Programme and can be accessed at any time. Contact details are available on the Wood Intranet or can be obtained via your local HR representative.

2.5 Anti-Retaliation

Anyone who complains or takes part in good faith in a bullying, harassment or sexual harassment investigation must not suffer any form of detrimental treatment or retaliation. If you feel you have suffered detrimental treatment or retaliation, please inform your manager or local HR representative as soon as possible.

2.6 Confidentiality

The Company's aim is to deal with matters sensitively and with due respect for the privacy of individuals involved. All workers must treat, in a confidential manner, any information communicated to them in connection with an investigation or disciplinary matters.

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3.0 References and Supporting Documents

Document Number	Description
COP-PLD-100008	Code of Conduct
HRM-POL-100015	Bullying and Harassment
HRM-POL-100016	Human Rights Policy
HRM-PRO-110097	UK & Republic of Ireland - Grievance Procedure
HRM-PRO-110104	UK & Republic of Ireland - Disciplinary Procedure

4.0 Abbreviations and Definitions

Term	Description
Worker	An individual who does work for an employer and is required to do the work personally - that is, they cannot send someone (a substitute) to do the work in their place and are therefore not self-employed. The word 'worker' in this procedure includes both contingent workers and employees.

5.0 Revision History

Rev	Date	Summary of Changes
0	14 November 2024	New document for issue.

6.0 Author/Checker/Owner

Author	Checker	Owner
Rachel McGachie - Senior HR Advisor, Global HR Policy and Governance	Laura Low - HR Manager, Global HR Policy and Governance	Zena Phillips - HR Director, Global HR Policy & Governance