



Anti-Bullying and Harassment Policy

AUGUST 2022

Contents

INTRODUCTION

| | | |
|-----|--------------------------|---|
| 1. | Scope | 4 |
| 2. | Purpose | 4 |
| 3. | Policy | 4 |
| 4. | Discipline | 4 |
| 5. | Forms of Harassment | 4 |
| 6. | Forms of Bullying | 5 |
| 7. | Procedure | 5 |
| 8. | Appeal | 5 |
| 9. | Confidentiality | 5 |
| 10. | Understanding the Policy | 5 |

INTRODUCTION - OUR POLICY

In support of our Core Values, 3i aims to establish and uphold high standards of behaviour and conduct. All employees are expected to conduct themselves at all times in a professional manner. This means, amongst other things, that employees are to treat colleagues and others with courtesy and respect. Harassment and bullying of Workers is unacceptable and will not be tolerated by 3i.

For US employees, please refer to your US Employee Handbook for more specific information and guidance on Anti-bullying and harassment.

1. Scope

This policy applies to all 3i employees, whether permanent or temporary, to job applicants and to non-3i employees such as agency staff who work at 3i (collectively "**Workers**").

2. Purpose

3i aims to build a good and productive working environment by ensuring that all Workers are treated with dignity and respect. It is 3i's policy to ensure that all Workers are free from harassment, intimidation, or other forms of bullying at work.

3. Policy

Harassment and bullying of Workers is unacceptable and will not be tolerated by 3i.

Harassment or bullying can occur both in the workplace itself and in settings outside the workplace, such as business trips, work events or social functions (whether or not on 3i premises). Harassment or bullying in any of these contexts is covered by this policy.

Every Worker has a personal responsibility to treat fellow workers, customers and clients with dignity and respect. If you are involved in management or recruitment, you have a duty to set an appropriate standard of behaviour and to ensure that those you manage understand and follow the policy.

4. Discipline

Bullying and harassment will not be tolerated. Anyone found to be in breach of this policy will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and could result in summary dismissal.

You should be aware that you may be personally liable for harassment of a fellow Worker.

5. Forms of Harassment

Harassment is any unwanted conduct affecting a Worker's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may be related to age, sex, sexual orientation, race, disability, religion or belief, or any personal characteristics (including perceived characteristics) of a Worker or of someone with whom a Worker associates.

Harassment may be physical, verbal, or non-verbal. It includes isolation, non-cooperation, and exclusion. Examples of harassment include touching or brushing against another worker's body; offensive or insensitive comments; and the use of offensive or inappropriate film clips or photographs taken on mobile phones.

Harassment may not be intentional or perceived by the perpetrator to be harassment. It can be enough that the conduct is unwanted by the recipient. Conduct does not have to be directed at the recipient to create an unacceptable working environment.

Owner: HR. Last updated August 2022. Next review August 2023.

Harassment generally only arises where conduct continues once it has been made clear that it is regarded by the recipient as offensive or unwanted. However, a single incident can constitute harassment if it is sufficiently serious.

6. Forms of Bullying

Bullying means offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power intended to undermine, humiliate, denigrate, or injure a colleague. Examples of bullying include ridiculing or demeaning others (particularly junior colleagues), overbearing supervision or unjustifiably excluding colleagues from meetings/communications.

7. Procedure

Because of the highly sensitive nature of harassment and bullying, the following procedure has been implemented to help resolve the issue in a timely and confidential manner.

1.1 Informal stage

- a) If you believe that you have been harassed or bullied, you are encouraged to explain to the person responsible why the behaviour is offensive and ask him/her to stop the unwelcome behaviour. It is possible for people to offend others unintentionally and, in such cases, people will usually stop as soon as they are aware they are causing offence.
- b) This informal stage will not generally result in any formal internal investigation or disciplinary action. It is intended to enable you to resolve the matter as quickly and amicably as possible.

1.2 Formal stage

- a) The informal approach may not be appropriate because of the nature of the harassment or bullying or because you do not feel able to talk directly to the person creating the problem (because it involves a third party, for example). In these cases, or where an informal approach has been unsuccessful, you should raise the issue with HR. The role of HR is to achieve a solution wherever possible and to respect the confidentiality of all concerned. (If the matter concerns a member of the HR team, you should refer it to The Head of Compliance).
- b) As a general principle, the decision to progress a complaint rests with you. However, 3i may independently pursue a complaint if it considers such action to be appropriate in all the circumstances. Staff who witness harassment or bullying are encouraged to report it using this policy so that it can be investigated, and appropriate action taken.
- c) If you wish to make a formal complaint, you should write to HR setting out full details of the unwanted conduct. These details should include the name of the alleged harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) when the harassment or bullying occurred, the name of any witnesses and any action taken so far to attempt to stop the harassment or bullying.

- d) Complaints will be managed in a timely and confidential manner with the investigation being conducted in an independent and objective manner. The investigation will pay due regard to the rights of both the complainant and the alleged harasser. Consideration will be given to whether the alleged harasser or bully should be moved away from you or suspended on full pay or whether managerial arrangements should be altered pending the outcome of the investigation.
- e) As part of the investigation, a member of the HR team will meet with you. You have the right to be accompanied by a 3i colleague or a trade union official of your choice. HR will also meet with the alleged harasser or bully who may also be accompanied by a 3i colleague or trade union official of his/her choice. HR will attempt to reach a conclusion within two weeks of your complaint being reported.
- f) If the investigation finds that harassment or bullying has occurred, prompt action will be taken to stop the harassment or bullying immediately and prevent its recurrence. The issue will then be dealt with under 3i's Disciplinary Policy. You will be told that disciplinary action has been taken but you will not be told the details of the sanction imposed.
- g) Even where a complaint is not upheld, (for example, where evidence is inconclusive), consideration will be given to how the ongoing working relationship between you and the alleged harasser or bully should be managed [or whether there are other steps that 3i should take such as providing additional training].
- h) Employees with a genuine complaint, or who report harassment or bullying that they have witnessed will be protected from intimidation, victimisation, or discrimination for making a complaint or assisting in an investigation.
- i) Any complaint that is false or not made in good faith will be treated as a disciplinary offence. Disciplinary action up to and including summary dismissal may be taken for abuse of this policy.

8. Appeal

If you are not satisfied with the outcome of the investigation, you have the right to appeal the decision within 14 days of being notified of the outcome. You should lodge your written appeal with HR. HR will then nominate an appropriate person to hear your appeal; he/she will do so in the event that he/she has been materially involved with the matter at an earlier stage. The person hearing your appeal will meet with you to discuss your appeal. You may be accompanied by a 3i colleague or a trade union official of your choice. You will be notified of the outcome of the appeal. This is the final stage of the Anti-Harassment and Bullying Procedure.

9. Confidentiality

Confidentiality is very important throughout all parts of this procedure. Only those people who need to know about the situation will be involved. It is the responsibility of anyone who is part of the process to respect the high level of confidentiality that is required. Breach of confidentiality may give rise to disciplinary action.

10. Understanding the Policy

It is important that you understand this policy fully. If you have any questions or are unclear about any part of it or its application, please contact HR for advice or training.