



Anti-Bullying and Harassment Policy

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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	6
9.	Confidentiality	6
10.	Understanding the Policy	7

INTRODUCTION - OUR POLICY

In support of our [Core Values](#), 3i is committed to maintaining the highest standards of behaviour and conduct. All employees are expected to act professionally at all times and to treat colleagues, clients and others with courtesy, dignity and respect. Bullying and harassment are unacceptable and will not be tolerated by 3i.

This policy sets out 3i's global standards for preventing and addressing bullying and harassment in the workplace. Where local legal requirements provide greater rights, protections or obligations than those outlined in this policy, those local requirements will take precedence.

Employees based in the United States should also refer to the US Employee Handbook, which contains additional information and guidance on bullying and harassment.

1. Scope

This policy applies to all employees, temporary staff, agency workers, contractors, consultants, interns, secondees and job applicants, as well as any other individuals working for or on behalf of 3i (collectively referred to as "**Workers**").

2. Purpose

3i aims to create a positive 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, and other forms of bullying at work.

3. Policy

Harassment and bullying of Workers is unacceptable and will not be tolerated by 3i. This policy applies to conduct occurring in the workplace, during business travel, at work-related social events, during training, conferences and client events, and through electronic communications including email, instant messaging, collaboration platforms, video conferencing tools and social media where connected to work.

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 ensure that those you manage understand and follow this policy.

Managers who become aware of potential bullying, harassment or retaliation are expected to take appropriate action and seek support from HR promptly.

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.

Please note that you may also be personally liable for harassment of a fellow Worker.

5. Forms of Harassment

Harassment is any unwanted conduct that affects a Worker's dignity or creates 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 someone with whom a Worker associates.

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

Sexual harassment is a form of harassment and is prohibited and will not be tolerated by 3i. Sexual harassment may include unwanted sexual conduct, sexual advances, touching, sexual jokes, comments of a sexual nature, displaying or sharing sexual images or content, intrusive questions about an individual's private life, or any other unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Any concerns or complaints of sexual harassment should be raised with HR and will be dealt with in accordance with the procedure set out in this policy.

Harassment may not be intentional or perceived as such by the perpetrator. It is sufficient that the conduct is unwanted or becomes unwanted over time by the recipient. Conduct does not have to be directed at the recipient to create an unacceptable working environment.

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

6. Forms of Bullying

Bullying refers to offensive, intimidating, malicious or insulting behaviour, that involves the abuse or misuse of power that has the effect of undermining, humiliating, intimidating, denigrating or negatively affecting another individual. Examples of bullying include ridiculing or demeaning others (particularly junior colleagues), overbearing supervision, or unjustifiably excluding colleagues from meetings or communications.

7. Procedure

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

1.1 Informal stage

- a) If you believe you have been harassed or bullied, you are encouraged to explain to the person responsible why the behaviour is offensive and ask them to stop. People can sometimes offend others unintentionally, and in such cases, they will usually stop once they are aware of the offence.
- b) This informal stage is intended to help you resolve the matter quickly and amicably and will not generally result in a formal internal investigation or disciplinary action.

1.2 Formal stage

- a) The informal approach is unsuccessful, or is inappropriate due to the nature of the harassment or bullying, or if you do not feel able to address the issue directly (e.g., if it involves a third party), you should raise the issue with HR. HR's role is to find a solution

where possible while respecting confidentiality. (If the matter concerns a member of the HR team, please refer it to the Director, Group Compliance.)

- b) As a general principle, the decision to progress a complaint rests with you. However, 3i may independently pursue a complaint if deemed appropriate under the circumstances. Staff who witness harassment or bullying are encouraged to report it using this policy to ensure it is investigated and addressed appropriately.
- c) To make a formal complaint, write to HR providing full details of the unwanted conduct. Include the name of the alleged harasser or bully, the nature of the harassment or bullying, the dates and times it occurred, the names of any witnesses, and any actions taken so far to stop the behaviour.
- d) Complaints will be handled in a timely and confidential manner, with investigations conducted independently and objectively. Both the complainant and the alleged harasser's rights will be respected. Consideration will be given to whether the alleged harasser should be moved away from you, suspended on full pay, or if managerial arrangements should be adjusted pending the investigation's outcome. Any temporary suspension implemented during an investigation will be a neutral act and does not imply any assumption regarding the outcome of the investigation.
- e) During 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 be accompanied by a 3i colleague or trade union official of their choice. HR will seek to investigate concerns as promptly as reasonably practicable. Timescales will depend on the complexity of the matter and the availability of relevant individuals.
- f) If the investigation confirms that harassment or bullying has occurred, prompt action will be taken to stop it immediately and prevent its recurrence. The issue will then be addressed under 3i's Disciplinary Policy. You will be informed that disciplinary action has been taken, but the specific details of the sanctions will not be disclosed.
- g) Even if a complaint is not upheld (e.g., due to inconclusive evidence), consideration will be given to managing the ongoing working relationship between you and the alleged harasser or bully, and whether additional steps such as further training are needed.
- h) No individual will suffer retaliation, victimisation, disadvantage or adverse treatment for raising a genuine concern, making a complaint, participating in an investigation or supporting another individual who has raised a concern.
- i) Making a complaint that is not upheld will not in itself result in disciplinary action. However, deliberately false, malicious or knowingly misleading allegations may be treated as a disciplinary matter. 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. Please submit your written appeal with HR. HR will then appoint an appropriate person to hear your appeal, ensuring that this individual was not materially

involved in the matter at an earlier stage. The person hearing your appeal will meet with you to discuss it. 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 constitutes the final stage of the Anti-Harassment and Bullying Procedure.

9. Confidentiality

Confidentiality is crucial throughout all stages of this procedure. Only individuals who need to be informed about the situation will be involved. Everyone involved in the process is responsible for maintaining the high level of confidentiality required. Any breach of confidentiality may result in disciplinary action.

10. Understanding the Policy

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