



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 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, as well as to job applicants and to non-3i employees, such as agency staff who work at 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. Harassment or bullying can occur both in the workplace and in settings outside of it, such as business trips, work events or social functions (whether or not on 3i premises). This policy covers harassment and bullying in all of these contexts.

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.

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.

Harassment may not be intentional or perceived as such by the perpetrator. It is sufficient that the conduct is unwanted 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 with the intent 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 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 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 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.
- 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 aim to reach a conclusion within two weeks of receiving your complaint.
- 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) Employees with a genuine complaint or those who report witnessed harassment or bullying will be protected from intimidation, victimisation, or discrimination for making a complaint or assisting in an investigation.
- i) Any complaint found to be 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. 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.