

Knauf (UK) GmbH						
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Title	Dignity at Work					
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1 GENERAL

- 1.1 Knauf UK & I recognises the diverse nature of our employees through a proactive approach to equality and diversity, embracing an inclusive culture of mutual respect. We all want to belong and work hard to deliver a positive environment for the conduct of all our activities, where all members of our workforce treat one another with mutual respect and dignity.
- 1.2 In accordance with the Company Code of Conduct, The Company has a zero-tolerance policy towards discrimination and harassment, and sexual harassment at work, regardless of whether these are based on age, disability, gender, race, religion or sexual orientation. The Company promotes an active learning culture that appreciates and encourages open feedback from all the persons involved.
- 1.3 Through our policies and practices, we work to ensure that all employees are welcome in our workplace and do not face discrimination with regard to any aspect of their identity, such as race, disability, gender, age, religion and belief or sexual orientation.
- 1.4 The purpose of this policy is to ensure that behaviour that could be construed as harassment and/or bullying in the workplace is prevented.
- 1.5 The Company is committed to creating a work environment free from unlawful discrimination, harassment and/or bullying, where everyone is treated with dignity and respect. No form of bullying and/or harassment will be condoned towards another employee, client or supplier. This may also include behaviours outside work if it has a bearing on the working relationship.
- 1.6 The policy aims to assist in developing a working environment in which harassment, sexual harassment and bullying are known to be unacceptable and where individuals have the confidence to complain about harassment, sexual harassment and bullying, should it arise, in the knowledge that their concerns will be dealt with appropriately, respectfully and fairly.
- 1.7 Likewise, any employee involved in the matter, including the person accused of the allegation will be dealt with appropriately, respectfully and fairly.
- 1.8 When appropriate, every effort will be made to resolve the situation informally. Some incidents, however, by virtue of their serious nature will need to be dealt with immediately under the formal procedure. Disciplinary action, including dismissal, may be taken against those failing to fulfil their responsibilities under this policy.

2 SCOPE

This policy applies to anyone working for Knauf UK & Ireland. This includes employees, workers, contractors, volunteers, work experience, interns, and apprentices. The policy also relates to job applicants and is relevant to all stages of the employment relationship. The policy also applies to bullying or harassment by third parties.

3 RESPONSIBILITIES

3.1 Line Managers

- 3.1.1 Line Managers must set a good example by treating all employees with dignity and respect. In turn they should be treated with respect by colleagues and those reporting to them.
- 3.1.2 Line Managers have a responsibility to understand the policy and make every effort to ensure that harassment and bullying does not occur.

- 3.1.3 Line Managers are responsible for ensuring that employees who report to them perform to an acceptable standard which may include feedback, providing constructive criticism regarding work or performance or challenging views and opinions in an appropriate way. These duties along with any other reasonable and lawful requests, made in a fair and consistent manner, will not constitute bullying.
- 3.1.4 Line Managers should take an allegation(s) of harassment or bullying seriously, responding promptly, sensitively and supportively to any employee who makes an allegation.
- 3.1.5 Line Managers should not wait until complaints are brought to their attention if they are aware of potentially offensive behaviour of other employees.
- 3.1.6 Line Managers should ensure that employees know how to raise concerns and are aware of the policy and sources of help and support.
- 3.1.7 Line Managers are responsible for ensuring employees attend all forms of Dignity at Work training.
- 3.1.8 Line Managers should attend any training provided to ensure that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace and by third parties that employees may have contact with.

3.2 Employees

- 3.2.1 We expect every one of our employees, to take personal responsibility for observing, upholding, promoting and applying this policy. Whatever your job is, this is part of your role.
- 3.2.2 All employees have a responsibility to comply with this policy. They must ensure that their behaviour towards colleagues is respectful, does not cause offence and could not in any way be considered harassment or bullying. This standard of behaviour is also expected of employees in relation to their dealings with customers, suppliers and external stakeholders.
- 3.2.3 All employees should not accept behaviour that may be offensive when directed towards themselves or others and take positive action to ensure that it is challenged and/or reported.
- 3.2.4 All employees should be aware that they can be held personally liable for harassment.

3.3 People Team

- 3.3.1 The People Team have a responsibility to ensure that this policy is followed fairly and consistently. Their duties will include:
 - Advising on the application of the policy.
 - Ensuring the effective implementation of the policy.
 - Monitoring an incidence of harassment and bullying and analysing the results.
 - Reviewing and amending the policy as necessary
 - Advise or support any employee who it is claimed is involved in the matter.
 - Undertaking regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace and by third parties that employees may have contact with.
 - Provide training for line managers to ensure that they understand how to implement this policy effectively and their role in preventing and stopping bullying and harassment from occurring in the workplace and by third parties that employees may have contact with.

4 What is Inclusion?

- 4.1 “The act of including someone or something as part of a group, list, etc., or a person or thing that is included.” (*Cambridge Dictionary*). Inclusion at Knauf is about ensuring that everyone feels valued and respected as an individual.

5 What is Harassment?

- 5.1 In the Equality Act 2010 harassment is defined as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'.
- 5.2 Under the Equality Act 2010 no employee or potential employee may receive less favourable treatment or consideration on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These categories are known in the Act as 'protected characteristics'.
- 5.3 Harassment, in the eyes of the law, may be forms of discrimination and as such unlawful. Serious harassment may be a criminal offence. Harassment can be any unwanted attention or behaviour that a person finds objectionable or offensive and which makes them feel threatened or uncomfortable, leading to a loss of dignity or self-respect. Appendix 1 (attached to this policy) contains illustrative examples of harassing behaviour which may take a wide variety of forms. This list is not exhaustive.
- 5.4 What is Sexual Harassment? The law defines Sexual Harassment 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; and less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

6 What is Bullying?

- 6.1 Acas define bullying as: 'Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient'.
- 6.2 Bullying is a more general form of harassment that is not based on race, sex or any other equality characteristic. As with harassment it can be defined as words, actions or other conduct which ridicules, frightens or threatens and affects individual dignity and well-being.
- 6.3 Examples of bullying include:
- Persistently criticising unnecessarily;
 - Shouting at colleagues in public or private;
 - Deliberate isolation by ignoring or excluding a person;
 - Withholding information or removing areas of responsibility without justification;
 - Spreading malicious rumours;
 - Blocking leave or training requests without reason;
 - Deliberately setting objectives with impossible deadlines;
 - Undermining a person's self-respect by treatment that denigrates, ridicules, intimidates, demeans or is physically abusive
- 6.4 The list is not exhaustive. The actions listed above must be viewed in terms of the purpose and effect. Harassment or bullying is assessed on both an intention to cause distress or hurt and the impact the
- 6.5 Harassment and bullying may be against one or more people and involves an inappropriate abuse of power. It may involve single or repeated incidents ranging from extreme forms of intimidating behavior, such as physical violence to microaggression, an example of this could be ignoring someone. It can often occur without witnesses.

7 PROCEDURES FOR DEALING WITH HARASSMENT, SEXUAL HARASSMENT, AND BULLYING

- 7.1 If an employee has a grievance under the Dignity at Work Policy, then it may be possible to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting. An informal discussion may help them to understand the effects of their behaviour and agree to change it. Anyone who believes they are being subjected to harassment, sexual harassment, or bullying may use the Company's Grievance Procedure to resolve it. If an employee wants to discuss the matter informally, they may do so, and the People team can provide advice on how to do this. Employees who have observed such behavior, even if they are not directly impacted, may also discuss their concerns with their Line Manager or member of the People team.
- 7.2 If an informal approach does not resolve matters, or the situation is too serious to be dealt with informally, an employee can make a formal complaint by using the Grievance Procedure. If the grievance relates to the employee's Manager,

then the grievance should be addressed to the People Business Partner. An employee should consult with the People Team if they are uncertain as to whom the grievance should be raised with.

- 7.3 Any Manager who receives a complaint under the Dignity at Work policy, or is witness to harassment, sexual harassment or bullying, must inform the People Team immediately to ensure that the problem is resolved as quickly as possible.
- 7.4 Any complaint should be made to the Line Manager or the People Business Partner.
- 7.5 A complaint may be made verbally or in writing, and where possible, state:
- the name(s) of those involved
 - the nature of the incidents
 - dates and times when harassment occurred
 - names of witnesses to any incidents
 - any action already taken by the complainant to stop the behaviour
- 7.6 Care will be taken during an investigation to treat all employees involved with consideration.
- 7.7 Formal complaints under the Dignity at Work Policy will be fully investigated in accordance with the Grievance Procedure and conducted as quickly as possible by either the People Business Partner or, if appropriate, another member of management, maintaining confidentiality at all times. All employees involved in the investigation are expected to respect the need for confidentiality. Failure to do so may lead to invoking the Disciplinary procedure.
- 7.8 If the investigation reveals that the complaint is valid, appropriate action will be taken to rectify the matter.
- 7.9 Copies of statements made by witnesses will normally be made available to the complainant and the person(s) about whom the complaint has been made.
- 7.10 The complainant and the person(s) about whom the complaint has been made may be accompanied by a work colleague of their choosing or a trade union official during any interviews conducted as part of the investigation.
- 7.11 Employees shall be protected from intimidation, victimisation or discrimination for making, in good faith, a complaint under the Dignity at Work Policy or for assisting in an investigation. Retaliating against a member of staff for taking, or assisting in, a grievance under the Dignity at Work Policy is a disciplinary offence which may result in dismissal.
- 7.12 Under Knauf's Whistleblowing Policy, in some cases an employee may wish to raise concerns or 'blow the whistle' on illegal, unsafe, or inappropriate activities through the Knauf Speak Up Line.

 Website	Speakup.knauf.com
 By Phone	(GER) 0800 181 2396 If an employee or former employee is dialing internationally, he or she can choose the location from the list for the international number assigned to the country on Speakup.knauf.com

8 PENALTIES

- 8.1 The Company views breaches of the policy as extremely serious.
- 8.2 The severity of the penalty imposed upon an employee found to have acted outside of this policy will be consistent with the Company's disciplinary procedure (e.g. serious instances will normally result in summary dismissal). Where a lesser penalty is appropriate (e.g. a Written Warning) this may be coupled with action to ensure that the complainant is able to continue working without embarrassment or anxiety. After discussion with the complainant, the investigating manager may instruct the transfer of the complainant, or the person found to have acted outside of this policy to a different work area or arrange for the amendment of working practices to minimise contact between the two employees.
- 8.3 Where the alleged bully/harasser is a third party, employees are encouraged to report this to their line manager or member of the People Team, so they can advise on the best course of action. It may be required to adjust the procedure

under this policy to ensure appropriate investigations are conducted, where possible this would be discussed with the employee.

- 8.4 If the complainant is not satisfied with the way their complaint has been handled, they may ask for it to be reconsidered by way of appeal under the grievance procedure. The complaint will be reviewed by another appropriate Manager, whose decision will be final.
- 8.5 An employee who receives a warning or is dismissed may appeal against the penalty in accordance with the Company's appeals procedure.
- 8.6 An employee who brings a complaint will not suffer victimisation for having brought the complaint, however, if the complaint is untrue and has been brought in bad faith (e.g. spite), disciplinary action may be taken.

9 Support available for affected employees.

- 9.1 We understand that anyone affected by, or involved with, a complaint of bullying or harassment may feel anxious or upset, the company will do its best to deal with any complaints, respectfully, empathetically, and as promptly as possible.
- 9.2 For support, you can access free, confidential counselling from our EAP, and other benefit providers through Flex Genius – Reward Hub. To access the support available please visit: using username and password.

10 RELATED POLICIES/DOCUMENTS

- Equality & Diversity Policy
- Code of Conduct
- Disciplinary Policy
- Grievance Policy
- UK.HRE.D.GN.0008.1 Forms of Harassment
- UK.HRE.D.GN.0008.2 Every Word Matters
- Whistleblowing Policy
- ALL/-/RA/00005 Sexual Harassment Risk Assessment

11 COMPLIANCE AND REVIEW

The policy will be reviewed regularly in accordance with any changes in legislation, regulations and/or good practice and also in continuing relevance and effectiveness.

Forms of Harassment	Definition	Example: verbal	Example: non verbal	Example: physical
Harassment On The Basis Of Age	Ridiculing or demanding behaviour focused towards people because of their age, regarding them as "too old" or "too young"; or making assumptions about lifestyle based on perceived age	- Making fun of someone based on their age - Questioning ability due to age - Patronising comments	- Excluding from social functions / information - Mimicking - Being written off - Making assumptions about life style / interests - Not providing training/development opportunities - Setting unrealistic objectives	
Harassment On The Grounds Of Sexual Orientation	Words, actions or other conduct which ridicules intimidates or threatens individuals because of their sexual orientation, and which affects the dignity or well-being of the individual.	- Verbal abuse or threats - Making rude jokes or comments - Inappropriate practical jokes. - Stereotyping - Making a pass - Derogatory nicknames -	- Offensive letters/ memos/emails - Gestures - Inadvertently or deliberately avoiding or excluding, e.g. inviting their "partner/spouse" to an event - Ostracising/excluding behaviour - Making assumptions based on sexuality - Making assumptions about lifestyle / interests -	
Sexual Harassment Or Harassment On The Grounds Of Gender Reassignment	Sexual Harassment is any unwanted behavior of a sexual nature. Any unwanted conduct based on the gender, gender identity or sexual orientation of the recipient, which is offensive and affects the dignity or well-being of the individual. People undergoing gender reassignment	- Inappropriate use of affectionate names - Personal questions / comments - Innuendoes or teasing - Comments which exclude because of gender - Sexual / explicit jokes - Demands for sexual favours. - Remarks, banter or jokes of a sexual nature.	- Display of pin-ups or pornographic pictures - Offensive publications or objects - Offensive letters / memos / emails / Social Media / Messages - Unsolicited / unwanted gifts - Gestures - Staring / Leering - Invasion of personal space - Unwelcome remarks about a person's dress or appearance.	- Unnecessary touching - Indecent exposure - Deliberate body contact - Sexual assault

	may also experience sexual harassment based on perceptions or assumptions about them in relation to their appearance or gender.	- Suggestive, explicit language - Stereotyping such as about the ability to work by one or other gender	- The worsening of conditions after a rejection - The worsening of conditions after a rejection of sexual advances.	
Harassment On The Grounds Of Religion And Belief	Words, actions or other conduct which ridicules, intimidates or threatens individuals because of their religion or belief, and which affects the dignity or well-being of the individual	- Derogatory comments or nicknames - Stereotyping a particular religion or belief. - Verbal threats - Jokes based on religious or belief based stereotypes - Invasive and / or inappropriate questions about religion or belief	- Arranging meetings that may exclude people on religious observance grounds - Arranging team lunches during periods of fasting or religious occasions - Displaying religious artefacts in the workplace which may be offensive to others - Isolating, excluding behaviour - Inappropriately enforcing a dress code which may not accommodate religious dress - Judgements about a person's ability or attitude based on their religion or belief - Making assumptions about lifestyle / interests	
Harassment On The Grounds Of Disability	Words, actions or other conduct which ridicules, intimidates or threatens an individual because of their disability and which affects the dignity or well-being of the individual.	- Making fun of or verbally mimicking impairment - Using inappropriate terms, e.g. cripple, spastic, handicapped - Questions and comments of a personal nature - Belittling or patronising comments or nicknames	- Making assumptions based on the individual's disability. - Mimicking the individual's disability. - Ignoring wishes and feelings - Exclusion from conversation or social activities. - Staring - Blatant excluding behaviour - Holding events at non accessible venues	- Inappropriate practical jokes - Hiding or moving an impairment aid - Unsolicited touching of a visually impaired person

Every word matters:

The words we speak and the words we write matter. So, it is important to think carefully about how you communicate to your colleagues, we ask that if you are not sure then you **PAUSE** before you say or write it. Think about how the person feels and what impact your words or actions are having on them – it should be something you put thought into every day.

You are here because you are smart, caring, and thoughtful people. We trust you to do the right thing. We leave no one behind.

This means we are inclusive in our language too. We can and should change our language to be more inclusive of all of us.

There is no place for anything racist, sexist, or derogatory, but it goes beyond that too. For example, it's sometimes common to address a group of people as 'guys', we are not stopping you from doing this, but we do ask that you be mindful of your audience.

Sometimes we may encounter situations or discussions where we are unsure about the right words to use or the most appropriate approach. In these instances, if you don't know, ask, for example – What pronouns do you use? Or how do you describe your ethnicity?

We recognise that promoting dignity at work involves an ongoing journey of education and growth for all employees. In recognising language creates a common understanding where prejudices can be reinforced, we must all make an effort to increase our understanding of respectful and inclusive language.