MCCARTHY MARLAND
RESOURCEFUL RECYCLING

Anti-Bullying and Harassment Policy

1. **Policy Statement**

McCarthy Marland (Recycling) Ltd is committed to providing a working environment in which all employees, workers, contractors, agency staff, consultants, customers and visitors are treated with dignity and respect.

The Company operates a zero-tolerance approach to bullying, harassment, victimisation and discrimination of any kind. Such conduct is unacceptable, will not be tolerated and may result in disciplinary action up to and including summary dismissal.

The Company recognises its legal obligations under the UK equality and employment legislation and is committed to taking all reasonable steps to prevent harassment occurring in the workplace.

This policy applies to all work-related activities, including:

- The workplace and Company premises
- Site visits and customer locations
- Business travel
- Conferences, exhibitions and training events
- Work-related social functions
- Electronic communications, including emails, telephone, social media, messaging platforms and video conferencing

2. Scope

This policy applies to:

- Employees
- Directors
- Agency workers
- Contractors and consultants
- Casual workers
- Apprentices
- Job applicants
- Any third party interacting with the Company

All individuals are expected to comply with this policy and contribute to a workplace free from bullying and harassment.

3. Definitions

Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour involving an abuse or misuse of power that undermines, humiliates, denigrates or injures another person.

Examples include:

- Persistent criticism or unjustified complaints
- Shouting, swearing or aggressive behaviour
- Excluding someone from work-related activities
- Deliberately undermining a person's work
- Spreading malicious rumours
- Excessive monitoring or micromanagement
- Threatening or intimidating conduct

Bullying may be a single serious incident or a pattern of behaviour

Harassment

Harassment is unwanted conduct related to a protected characterisation which has the purpose or effect of:

- Violating a person's dignity, or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment

Protected characteristics include:

- Age
- Disability

- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage and civil partnership
- Pregnancy and maternity

Examples include

- Offensive jokes or comments
- Mockery or ridicule
- Displaying offensive material
- Insults or derogatory remarks
- Deliberate exclusion
- Unwanted physical contact

4. Third-Party Harassment

The Company recognises that harassment can arise from customers, suppliers, contractors, visitors and other third parties.

Any employee who experiences or witnesses' harassment by a third-party should report the matter immediately.

The Company will take appropriate steps which may include:

- Investigating the complaint
- Warning the third-party
- Restricting access to Company premises
- Terminating commercial relationships where appropriate
- Reporting incidents to relevant authorities

5. Responsibilities

Management

Managers and supervisors must:

- Lead by example
- Promote respectful behaviour
- Take complaints seriously
- Act promptly when concerns are raised
- Ensure employees understand this policy
- Take reasonable steps to prevent harassment and sexual harassment

Employees

Employees must:

- Treat others with dignity and respect
- Refrain from bullying, harassment and sexual harassment
- Report concerns promptly
- Co-operate with investigations
- Support a respectful working environment

6. Reporting Concerns

Where appropriate and where the complainant agrees, issues may be resolved informally.

Reports may be made to:

- Their line manager
- A more senior manager
- Human Resources
- A Company Director

Complaints may be made verbally or in writing.
The Company will treat all complaints seriously and confidentially as far as reasonably practicable.

7. Informal Resolution

Where appropriate and where the complainant agrees, issues may be resolved informally.

This may include:

- Explaining that the behaviour is unwelcome
- Facilitated discussions
- Mediation

Informal action will not be appropriate where the allegations are serious.

8. Formal Investigation

Where a formal complaint is made, the Company will:

- Acknowledge the complaint promptly
- Appoint an impartial investigator
- Interview relevant witnesses
- Review available evidence
- Reach findings based on the balance of probabilities

- Take appropriate action

Investigations will be conducted as quickly as possible while ensuring fairness to all parties.

9. Disciplinary Action

Bullying or harassment by an employee will normally be treated as misconduct and may constitute gross misconduct.

Depending on the circumstances, disciplinary sanctions may include:

- Informal counselling
- Written warning
- Final written warning
- Dismissal without notice for gross misconduct

10. Protection from Victimisation

No individual will suffer any detriment for:

- Making a complaint in good faith
- Supporting a complaint
- Participating in an investigation

Victimisation will itself be treated as a disciplinary matter.

11. Training and Prevention

The Company will take reasonable steps to prevent bullying or harassment by:

- Providing regular training
- Communicating this policy to staff
- Monitoring workplace culture
- Investigating complaints promptly
- Reviewing risks and working practices
- Taking action where issues are identified

12. Confidentiality

All complaints and investigations will be handled sensitively and confidentially.

Information will only be disclosed where necessary to investigate and resolve the matter or where required by law.

13. False Allegations

Complaints made in good faith will not result in disciplinary action, even if not upheld.

However, deliberately false or malicious allegations may result in disciplinary action.

14. Monitoring and Review

This policy will be reviewed regularly and updated to reflect changes in legislation, guidance and best practice.

Signed: ..... **Date:** 5th November 2026

Company Secretary