MCCARTHY MARLAND
RESOURCEFUL RECYCLING

Sexual Harassment Policy

What this policy covers

This policy applies to all employees, workers and contractors. The workplace includes normal business premises, client sites or any work-related setting (including locations for training and work-related social events). This policy also applies to virtual settings and social media where deemed to be work-related.

The Company is fully committed to promoting an environment which is free from sexual harassment and where everyone is treated with respect and dignity. The aim of this policy is to prevent sexual harassment in the workplace which includes sexual harassment by other workers or by third parties you encounter while doing your job.

Sexual harassment is unlawful and the Company has a zero-tolerance approach to it. Such behaviour is unacceptable and will not be permitted or condoned and will be viewed as a gross misconduct offence which may result in dismissal without notice.

What is sexual harassment?

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a worker's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that worker.

It can also be treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature in the past.

A single incident of unwanted or offensive behaviour can amount to sexual harassment. Some examples are given below, but many forms of behaviour can constitute sexual harassment.

Sexual harassment can occur in various forms and can occur in the workplace, outside work, in person, by phone or online.

Sexual Harassment can be from someone of the same or a different sex.

Examples of sexual harassment are as follows:

- Persistent suggestions to meet up socially after a person has made clear that they do not welcome such suggestions
- Suggestions of sexual activity
- Unwanted physical contact or touching
- Sending offensive or sexual material by any method (e.g. by text, email or social media)

- Unwelcome sexual advances, suggestive behaviour or propositions
- Offensive comments about appearance or dress, innuendo or lewd comments
- Making sexually suggestive gestures
- Spreading gossip and speculation about a person's sexual orientation or status, including spreading rumours
- Making sexual comments or jokes
- Displaying sexually graphic pictures, posters or photographs
- Making promises in return for sexual favours
- Intrusive questions about a person's sex life or discussions of one's own sex life

Third-party harassment

Third-party harassment occurs where an individual is harassed or sexually harassed by someone who does not work for, and who is not an agent of the same employer, but with whom they have come into contact during their employment. An example of third-party harassment could be unwelcome sexual advances from a client, customer or supplier visiting the Company's premises.

Third-party sexual harassment can result in legal liability, and the Company will not tolerate it in any circumstances. All staff are encouraged to report any third-party harassment that they witness or are victim of.

Any sexual harassment by a member of staff against a third-party will be viewed as a gross misconduct offence which may result in dismissal without notice.

The Company has a legal requirement to take all reasonable steps to prevent sexual harassment of its staff by third parties. These steps may include displaying warning notices to customers and recorded messages at the beginning of telephone calls confirming expected standards of behaviour.

If any third-party harassment of staff occurs, the Company will take steps to remedy and to prevent it from happening again. This could include reporting any criminal acts to the police.

Your Rights

You have the right to work in a safe environment which is free from any form of sexual harassment.

Anyone who is a victim of sexual harassment is strongly encouraged to report it. All complaints will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that, when you make a complaint, you will be protected from further acts of harassment. You will not suffer any form of retaliation or victimisation as a result of raising any such complaints. If others also give evidence or information in connection with the complaint, they equally will be protected. Perpetrators of these acts will be subject to disciplinary action which may warrant dismissal. The Company will take into account any aggravating factors such as the abuse of power over a more junior colleague when deciding the appropriate action to take.

Your Responsibilities

You have a responsibility to help ensure a working environment in which dignity of everyone is respected. You must comply with this policy, and you should ensure that your behaviour to colleagues and anyone connected to the Company, does not cause offence and could not in any way be considered to be sexual harassment.

You should discourage sexual harassment by making it clear that you find such behaviour unacceptable. You should also support colleagues who suffer such treatment and are considering making a complaint. You must alert a manager or supervisor immediately to any incident of sexual harassment to enable the Company to deal with the matter promptly and effectively.

The Company's Responsibility

The Company will ensure that adequate resources are made available to promote respect and dignity in the workplace and to deal effectively with complaints of sexual harassment. This policy will be communicated effectively to all, and the Company will ensure that everyone is aware of their responsibilities.

The Company has a legal requirement to take reasonable steps to prevent sexual harassment of its staff. These steps are as follows:-

- Ensuring all new starters attend equality, diversity and inclusion training and anti-bullying and anti-harassment training
- Requiring all workers to attend regular equality, diversity and inclusion training and anti-bullying and anti-harassment training on at least an annual basis
- Providing additional training for line managers to ensure that they fully understand how to implement this policy effectively and their role in preventing and stopping sexual harassment from occurring in the workplace
- Encouraging and welcoming concerns and complaints being raised where individuals consider they have experienced or witnessed incidents of sexual harassment
- Ensuring that concerns or complaints of sexual harassment are treated with sensitivity and care and addressed in a proper and thorough manner through our Company procedures
- Ensuring that the Company has designated workplace champions who have received training on sexual harassment prevention
- Monitoring our workplace culture through anonymous surveys, exit interviews, one-to-one conversations and return-to-work meetings to identify and address any issues or themes
- Undertaking regular risk assessments to determine reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace
- Ensuring that our zero-tolerance approach to all forms of discrimination, and bullying and harassment is communicated to all workers and third parties that the Company have contact with

Reporting Procedure

In order to raise a complaint of sexual harassment, please refer to the Company's Grievance Procedure which is outlined in the Company Handbook or contact your line manager in the first instance.

Monitoring

This policy will be reviewed at regular intervals to monitor its effectiveness and implement any required changes.

The Company will monitor the treatment and outcomes of any complaints of sexual harassment to ensure that they are effectively investigated and resolved.

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

Company Secretary

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