

Anti-Bullying & Harassment Policy

1. Purpose and Statement of Intent

Kernow Fixings Ltd ("the Company") is committed to providing a working environment in which all individuals are treated with dignity and respect, and which is free from bullying, harassment, and victimisation.

The Company regards such conduct as wholly unacceptable and will not tolerate it in any form, whether between colleagues, by or towards management, or involving customers, suppliers, contractors, or other third parties.

This policy sets out the standards of behaviour expected of all individuals and the means by which concerns may be raised and addressed.

2. Legislative and Regulatory Framework

This policy is established in accordance with, and should be interpreted in the context of, the following legislation and guidance:

- The **Equality Act 2010**, which defines harassment in relation to protected characteristics and prohibits harassment, discrimination, and victimisation;
- The **Worker Protection (Amendment of Equality Act 2010) Act 2023**, which introduced a positive duty on employers to take reasonable steps to prevent sexual harassment of employees in the course of their employment;
- The **Protection from Harassment Act 1997**;
- The **Health and Safety at Work etc. Act 1974**, insofar as it concerns the protection of employee wellbeing;
- Relevant guidance issued by the **Equality and Human Rights Commission (EHRC)** and the **Advisory, Conciliation and Arbitration Service (Acas)** concerning the prevention and handling of bullying and harassment in the workplace.

3. Scope

This policy applies to all employees, workers, contractors, agency workers, and volunteers engaged by the Company, in respect of conduct occurring in the workplace and in any work-related context, including business travel, work-related events, and communications through any medium. It does not form part of any employee's contract of employment and may be amended at any time.

4. Definitions

Harassment is defined as unwanted conduct related to a relevant protected characteristic - namely age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity - which has the purpose or effect of violating an individual's dignity, or of creating an intimidating, humiliating, or offensive environment. Harassment may also arise where an individual is treated less favourably because they have rejected or submitted to such conduct.

Bullying is not separately defined in statute but is understood by the Company to mean offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power, which has the effect of undermining, humiliating, or injuring the recipient. Bullying may occur on a single occasion or persistently.

Victimisation means subjecting an individual to a detriment because they have made or supported a complaint, or raised a concern, under this policy or relevant legislation.

5. Standards of Conduct

All individuals are expected to treat one another with dignity, courtesy, and respect, and to conduct themselves in a manner consistent with this policy. Each individual bears personal responsibility for their own behaviour. Those in positions of management bear an additional responsibility to model appropriate conduct, to foster a respectful working environment, and to address any conduct falling below the expected standard.

6. Commitment to Training and Prevention

The Company is committed to the prevention of bullying and harassment, not merely to its remedy. Accordingly, training on the standards set out in this policy forms part of the Company's mandatory annual training schedule for all employees and management. Through this ongoing programme, the Company seeks to ensure that all individuals understand what constitutes unacceptable behaviour, are aware of their responsibilities, and are equipped to raise and address concerns appropriately.

This commitment reflects, and is intended to satisfy, the Company's positive obligation to take reasonable steps to prevent harassment in the workplace.

7. Raising a Concern

Any individual who believes they have been subjected to, or has witnessed, bullying or harassment is encouraged to raise the matter. Where the individual feels able to do so, an informal resolution may be sought by making the perpetrator aware that their behaviour is unwelcome and requesting that it cease.

Where an informal approach is inappropriate, unsuccessful, or insufficient given the seriousness of the conduct, a formal complaint may be raised with the individual's line manager or with a director of the Company. Where the concern relates to that person, it should be raised with an alternative member of management.

8. The Company's Response

All complaints will be treated seriously, handled sensitively, and addressed promptly and confidentially so far as is reasonably practicable. The Company will undertake a fair and proportionate investigation and will keep the complainant appropriately informed. No individual will be subjected to any detriment for raising a genuine concern in good faith, even where that concern is ultimately found to be unsubstantiated.

Where, following investigation, bullying or harassment is found to have occurred, the matter will be addressed under the Company's Disciplinary Procedure. Such conduct may constitute gross misconduct, potentially warranting dismissal. Knowingly false or malicious complaints will likewise be treated as a disciplinary matter.

9. Responsibility and Review

The Board of Directors of Kernow Fixings Ltd holds overall responsibility for this policy, for ensuring its effective operation, and for its periodic review. This policy will be reviewed at regular intervals, and in any event following any material change in relevant legislation, to ensure its continued effectiveness and compliance.

Name:	Daniel Furse	Date:	2 nd June 2026
Position:	Managing Director	Review:	1 st June 2027