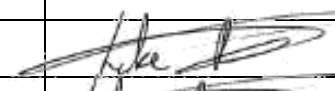
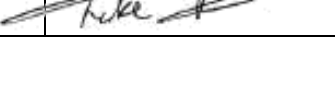
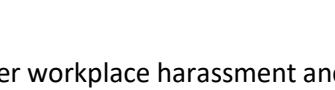


DOCUMENT TITLE: Anti-Harrassment And Bullying

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ANTI-HARRASSMENT AND BULLYING POLICY:

The Company's policy on sexual harassment and other workplace harassment and bullying explains the Company's intolerance for such behaviour at its work locations and during work-related activities, such as business trips and work events or social functions. The policy also describes the actions the Company will follow regarding any alleged harassment that becomes known to any member of management and the steps it will take in general to foster an environment free from harassment.

HARASSMENT:

The Company strives to provide its employees with a workplace free of unlawful harassment from others (including company employees, applicants, guests, visitors, clients, vendors or contractors).

Harassment is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of affecting a worker's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. A single incident of unwanted or offensive behaviour to one individual can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, gender, gender reassignment being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion, belief or lack of religion/belief, membership of the Traveller Community or sexual orientation (the "Protected Characteristics").

- 'Gender' discrimination covers men and women. Discrimination because of pregnancy or maternity leave is also defined as gender discrimination. Under EU law a transgender person who experiences discrimination arising from their gender reassignment, or transition, is protected under the gender ground.
- 'Civil status' is defined as being single, married, separated, divorced, widowed, in a civil partnership (within the meaning of the Civil Partnership and Certain Rights and Obligations

of Cohabitants Act 2010) or being a former civil partner in a civil partnership that has ended by death or been dissolved.

- Family status' means responsibility as a parent or person in loco parentis for a person under the age of 18 years or responsibility as a parent or resident primary carer of a person of 18 years or over with a disability requiring care or support.
- 'Disability' is defined broadly as, for example: the total or partial absence of a person's bodily or mental functions; the presence of organisms which cause or are likely to cause disease; the malfunction, malformation or disfigurement of a part of a person's body; a condition or malfunction which results in a person learning differently from a person without the condition or malfunction; or a condition or illness which affects a person's thought processes, perceptions of reality, emotions or judgement or which results in disturbed behaviour. The definition includes a disability which exists, which previously existed, which may exist in the future, or which is imputed to a person.
- Sexual orientation' is defined as heterosexual, bisexual or homosexual.
- Age' refers to the protection against age-related discrimination in employment and applies only to employees over the maximum age at which a person is statutorily obliged to attend school. (The minimum school leaving age is currently 16 years, or the completion of three years of post-primary education, whichever is the later).
- 'Race' includes race, colour, nationality or ethnic or national origins.
- 'Religious belief' includes different religious background or outlook, (including the absence of religious belief).
- 'Membership of the Traveler community', means a member of the community of people who are commonly called Travelers and who are identified (both by themselves and others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.

Harassment is unacceptable even if it does not fall within one of these categories.

Harassment may include:

- Verbal harassment - jokes, comments, ridicule or songs;
- Written harassment - including graffiti, text messages, emails, social media or internet posts;
- Physical harassment - jostling, shoving or any form of assault;
- Intimidatory harassment - gestures, posturing or threatening poses;
- Visual displays such as posters, emblems or badges;
- Excessive monitoring of work;
- Isolation or exclusion from social activities;
- Unreasonably changing a person's job content or targets; and
- Retaliation by any of the above means for having reported harassment or discrimination or having assisted another employee to report harassment or discrimination.

Sexual harassment is defined in section 14A(7) of the EEA as any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, degrading, humiliating or offensive environment for the person. The conduct at issue may not be specifically directed at a particular employee but nevertheless has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Many forms of behaviour can constitute sexual harassment. A single incident may constitute sexual harassment. Sexual harassment includes behaviours like those in the following list, which is illustrative and not exhaustive:

- Physical conduct of a sexual nature - this may include unwanted physical contact such as unnecessary touching, patting or pinching or brushing against another employee's body, assault and coercive sexual intercourse;
- Verbal conduct of a sexual nature - this includes unwelcome sexual advances, propositions or pressure for sexual contact, continued suggestions for social contact outside the work place after it has been made clear that such suggestions are unwelcome, unwanted or offensive, suggestive remarks, innuendo or lewd comments, graffiti, written materials, emails, text messages or social media posts;
- Non-verbal conduct of a sexual nature - this may include the display of pornographic or sexually suggestive pictures or objects. It may also include stalking, indecent exposure, leering, whistling or making sexually suggestive gestures; and
- Gender-based conduct - this includes conduct that denigrates or is abusive of an employee for reasons related to his or her sex such as derogatory or degrading abuse or insults which are gender based. This might include conduct that insults or degrades an employee because she is pregnant or because s/he is transgender.

BULLYING:

Bullying is repeated offensive, intimidating, malicious or insulting behaviour which, through the abuse or misuse of power, makes the recipient feel vulnerable, upset, humiliated and threatened. Power includes both personal strength and the power to coerce others through fear or intimidation. Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. One isolated incident of such behaviour, while unacceptable, will not amount to "bullying".

As with harassment, bullying can take the form of physical, verbal and non-verbal conduct. Physical conduct includes perceived horseplay, touching, pinching, and pushing as well as grabbing, shoving, punching and other forms of physical assault. In addition to the manner in which workers speak to and about one another, written material and pictures (including that disseminated by interactive and digital technologies) can be used to bully. These include emails, text messages, film clips and photographs taken using cameras in mobile phones as well as content uploaded onto websites.

Bullying does not include reasonable and appropriate criticism of an employee's performance or behaviour or reasonable requests made of employees.

Non-exhaustive examples of bullying include:

- Shouting at, being sarcastic towards, ridiculing or demeaning others;
- Making physical or psychological threats;
- Overbearing supervision and making inappropriate and/or derogatory marks about a worker's performance;
- Abuse of authority or power by those in positions of seniority;
- Unjustifiably excluding colleagues from meetings/communications.

REPORTING HARASSMENT OR BULLYING:

If you believe you have been harassed or bullied, you should make a complaint to your own or any other company Manager or management as soon as possible after the incident. Your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. Managers must refer all harassment complaints to the Office Manager. Subject to your agreement and depending on the nature of the allegations, the Company may try to resolve the complaint informally in the first instance, if you do not agree to this, however and wish to pursue the complaint formally, the Company will undertake a prompt, thorough and objective investigation of the complaint. Your name and the name of the alleged harasser or bully will not be divulged other than on a 'need to know basis' to those individuals involved in the investigation. At the outset, an investigating officer - generally a senior manager or director with no prior involvement in the complaint will be appointed.

You have an obligation to cooperate fully in all investigations, and you are required to provide complete, accurate and truthful information. You may be accompanied by a colleague or trade union official of your choice at any meeting between you and the investigator, as may the alleged harasser or bully. For the avoidance of doubt, this should not be taken as meaning the Company will recognise any trade union for collective bargaining purposes where it is not legally obliged to do so.

Intentionally false allegations or those not made in good faith may result in disciplinary action up to and including termination.

At the conclusion of the investigation, the investigating officer will submit a draft report to you and the alleged harasser or bully for review and comment, following which the report will then be finalised and submitted to the Office Manager, who will report their finding back to both parties as soon as reasonably practicable. The Office Manager will determine whether the application of the disciplinary policy is warranted to either of the parties to the complaint.

If you are not satisfied with the outcome of the investigation, you have the right to appeal this (save where the outcome is to apply the disciplinary policy to one or both of the parties, in which case any disciplinary sanction imposed may be appealed in accordance with the disciplinary policy). You should notify the Office Manager of your appeal within 5 days of receiving the notification of the outcome, setting out the full written grounds of your appeal. A director will be appointed to hear your appeal and a meeting will be arranged with you to discuss your appeal, at which you may be accompanied by a colleague or a trade union official of your choice. For the avoidance of doubt, this should not be taken as meaning the Company will recognise any trade union for collective bargaining purposes where it is not legally obliged to do so.

We will inform you of the outcome of the appeal as soon as reasonably practicable after the closing of the appeal meeting.

POLICY AGAINST RETALIATION:

The Company forbids any employee from engaging in any actions of a retaliatory nature against another employee because that employee reported harassment or bullying or testified or otherwise assisted in an investigation or other proceeding regarding a complaint of harassment or bullying. If you experience or witness any conduct you believe to be retaliatory, immediately report the incident to your Manager, any member of management, or the Board, so that the complaint can be quickly and properly resolved.

We trust that all employees of the Company will continue to act responsibly to create and maintain a pleasant and professional working environment that is free of unlawful-harassment and bullying.

For further information, please refer to the Code of Practice published by the Health and Safety Authority in 2021 for Employers and Employees on the Prevention and Resolution of Bullying at Work, a copy of which we attach at this [link](#).

A handwritten signature in black ink, appearing to read 'Luke Deasy', is written over a horizontal line.

Luke Deasy
Managing Director