



the Movie Lot Services Ltd is committed to providing an environment in which all individuals, clients and the public are treated with dignity and respect. The Company is committed to promoting a working environment in which everyone is treated equally.

This anti-harassment and bullying policy is core to the Company's commitment and will be applied rigorously. This policy defines what the Company considers to be bullying and harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions.

All directors, officers, consultants, contractors, sub-contractors and workers engaged or contracted by or with the Company and third parties such as customers, suppliers or visitors to the Company's premises ("Workers") are responsible for acting in accordance with the standards detailed in this policy and applying to every situation the basic principles of fairness, honesty, integrity, and compliance with the law. Workers must ensure that adherence to these standards and values are given the highest priority within the Company.

Workers should feel that they are treated with the requisite dignity and respect. Furthermore we expect our management to act as role models in their business conduct and leadership style. Behaviour that goes against our standard of business ethics will be identified and investigated. This policy is non-contractual and it does not form part of workers' terms and conditions with the Company. The Company reserves the right to amend this policy at any time. Please study this policy and make sure you understand how it relates to your role and position within the Company.

## **Who has to comply with this policy?**

This policy applies to all Workers. It also applies to those individuals, subcontractors and suppliers visiting the Company's premises and providing products and/or services to the Company.

## **What happens if this policy is breached?**

Failure to follow this policy may result in disciplinary action. Breaches of the policy may also represent breaches of the law and may result in legal sanctions for the Worker and/or the Company.





## What is considered bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, undermined, humiliated, denigrated or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal and non-verbal conduct.

Bullying may include, by way of example:

- Physical or psychological threats;
- Overbearing and intimidating levels of supervision;
- Inappropriate derogatory remarks about someone's performance.

Legitimate, reasonable and constructive criticism of a Worker's performance or behaviour, or reasonable instructions given to Workers will not amount to bullying on their own.

## What is considered harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. Unlawful harassment may involve conduct of a sexual nature or it may be related to race, colour, nationality, marital or civil partner status, pregnancy or maternity, disability, gender re-assignment, religion or belief, ethnic or national origin, sexual orientation or age. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may take many forms and include:

- conduct which is unwanted by the recipient and perceived as hostile or threatening;
- conduct which gives rise to a hostile or threatening work environment;
- conduct which creates an atmosphere in which it is feared that rejection or submission will be used as a basis for decisions which have an impact on the recipient at work.

The following are examples of types of behaviour which may amount to harassment:

- Physical or sexual assault.
- Requests for sexual favours in return for career advancement.
- Unnecessary physical contact.
- Exclusion from social networks and activities or other forms of isolation.
- Compromising suggestions or invitations.
- Suggestive remarks or looks.
- Display of offensive materials, including on a computer screen.
- Tasteless jokes or verbal abuse, including but not limited to any sent by email.
- Offensive remarks or ridicule.
- Dealing inappropriately or inadequately with complaints of harassment.





## How I will be protected and supported?

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you feel uncomfortable. If this is too difficult or embarrassing, you should speak to your [line manager or Human Resources], who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter under the Company's Disciplinary Procedure. Where harassment is found to have occurred this will amount to misconduct or gross misconduct.

No one who makes an allegation of harassment in good faith should be subjected to any detriment as a result. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied the matter should be raised formally using the Company's Complaints & Grievance Procedure.

"Good faith" does not mean that a reported concern must be correct, but it does require that a Worker be truthful when reporting a concern. The Company aims to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Retaliation against someone or the victimisation of someone who reports a problem in good faith may result in sanctions against the retaliator, up to and including termination of their contract with the Company.

If the Company concludes that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

## What happens if I raise a concern?

The Company will usually arrange a meeting as soon as possible to discuss the Worker's concern. The Worker will be allowed to bring a colleague or trade union representative to any meetings. Any companion must respect the confidentiality of the disclosure(s) and any subsequent investigation.

Information about a complaint by or about a Worker may be placed on the individual's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with the Company's Privacy Policy / Data Protection Policy.





## **Will my concern be treated confidentially?**

The Company intends that Workers will feel able to voice whistleblowing concerns or other concerns of bullying and harassment openly under this policy. Completely anonymous disclosures are difficult to investigate. If Workers would prefer to raise their concern confidentially, the Company will make every effort to maintain the identity of the Worker a secret and only reveal it where necessary, to those involved in investigating your concern.

## **Why we apply this policy?**

It is our wish to set a standard in the industry where people are treated fairly and as equals and where everyone should experience a safe work environment. The Company is committed to creating a working environment of mutual trust and respect with support for cultural diversity, an open and honest team. Co-operation and an environment free of intimidation, fear and harassment form the basics of our corporate culture.

## **Can I alert someone external to the Company?**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases Workers should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for Workers to report concerns to an external body such as a regulator. The Company strongly encourages Workers to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline.

The Movie Lot will revise and review this policy regularly.

