



POLICY

Anti-Harassment and bullying policy (CP.021)

VGC Value – “We look after each other” - People are central to our success

Vision

The VGC Group and its associated companies operate an ethical and open approach to the way we do business. Harassment, bullying and victimisation do not align with our business values and are unacceptable in our work environment. We do not tolerate any form of inappropriate behaviour that violates a person’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive.

Strategy

The VGC Group requires that no one engaged by VGC shall:

This policy applies to all employees and associated persons, including directors and senior managers, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the company. It applies in the workplace and in any work-related setting, including business travel, training, social events, telephone calls, email, messaging services and social media. While working on behalf of the VGC Group, everyone shall treat others with dignity and respect and maintain the highest standards of conduct.

VGC is committed to providing a working environment free from bullying, harassment, sexual harassment and victimisation. VGC adopts a zero-tolerance approach to such conduct and will take reasonable steps to prevent sexual harassment. Any employee or worker found to have breached this policy may be subject to disciplinary action, up to and including summary dismissal.

Harassment and bullying

Harassment can take many forms, and a person may not realise their behaviour is harassment. It is unwanted behaviour that violates someone’s dignity or makes them feel intimidated, humiliated or offended.

Bullying is offensive, intimidating or insulting behaviour by a person or group. It can also involve misusing power to undermine or humiliate someone. Bullying may happen repeatedly or as one serious incident. Examples of bullying or harassment include:

- insensitive jokes, pranks;
- spoken or written abuse, threats or insulting comments;
- unwanted conduct of a sexual nature;
- offensive images, graffiti, gestures or mimicry;
- unwanted physical contact or interference with a person or their property;
- aggression, intimidation or deliberate undermining;
- spreading malicious rumors;
- unfairly excluding, isolating or victimizing a person;
- misusing authority, including imposing unreasonable or deliberately humiliating work demands;
- inappropriate conduct through email, telephone, messaging services or social media.

These examples are not exhaustive. Reasonable and constructive management action, including legitimate performance management, does not normally amount to bullying when carried out fairly and respectfully.

A single serious incident may amount to harassment or bullying. It is not necessary for the recipient to have asked for the behaviour to stop before a concern can be raised.

Reporting concerns

VGC encourages anyone who experiences or witnesses bullying, harassment, sexual harassment or victimisation to report it promptly. Where appropriate, an individual may first explain that the behaviour is unwelcome and ask for it to stop. No one is required to approach the person concerned directly.

Concerns should be raised with the individual’s line manager. If the concern involves the line manager, or the individual would prefer not to speak to them, it should be raised with the HR department or a senior manager. Concerns involving a customer, client, supplier, contractor or other third party should be reported in the same way.

All concerns will be taken seriously and handled as sensitively and confidentially as reasonably possible. Information may need to be shared with those involved in reviewing or investigating the matter. Anyone who raises a genuine concern, supports a complaint or participates in an investigation will not be subjected to detrimental treatment or victimisation.

Investigation and action

Where a concern is raised, VGC will:

- appoint an appropriate and impartial person to investigate;
- gather relevant information and speak confidentially with the individuals concerned and any witnesses;
- give the person whose conduct is under review a full and fair opportunity to respond and allow accompaniment where the applicable procedure provides for it;
- assess the evidence objectively and avoid allowing personal views to influence the outcome;
- consider proportionate interim measures where necessary to protect those involved or the integrity of the investigation;
- keep appropriate confidential records in accordance with applicable data protection legislation and VGC retention requirements.

VGC may suspend or temporarily redeploy an individual during an investigation where this is considered necessary and proportionate. Such action is neutral and does not constitute disciplinary action or a finding that the allegations are true. Following the investigation, VGC will decide whether further action is required. Where appropriate, formal action will be taken under the relevant disciplinary or grievance procedure. Deliberately false or malicious allegations may be dealt with as a disciplinary matter; however, a concern raised in good faith will not result in action simply because it is not upheld. This policy is non-contractual and does not form part of any employee’s terms and conditions of employment. VGC may review and amend it to reflect legal, regulatory or organisational changes.

Signed

Dated: 20 March 2026

Ciara Pryce
Chief Executive Officer

This policy confirms the commitments of all members of the VGC Group.

Related Information

