

Non Harassment and Anti Bullying Policy

Capital Sky supports your right and opportunity to seek, obtain, and hold employment without discrimination, bullying, or harassment, and with full respect for your dignity.

Harassment or bullying in the workplace is unacceptable and, in many cases, unlawful. We are committed to providing a working environment that is harmonious, respectful, and free from intimidation. This principle extends to everyone our organisation deals with, including employees, subcontractors, clients, visitors, and members of the public.

What Is Harassment?

Harassment is:

“Unwanted conduct related to a relevant protected characteristic, which violates an individual’s dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that individual.”

Harassment may occur even if:

- The behaviour is not directed at the complainant
- The complainant does not personally possess the protected characteristic
- The behaviour is based on perception or association
- The behaviour is carried out by a third party (e.g., client, subcontractor, visitor)

Harassment can be verbal, non-verbal, written, visual, or physical.

What Is Bullying?

Bullying is offensive, intimidating, malicious, or insulting behaviour that undermines, humiliates, or injures the person on the receiving end.

Bullying does not need to relate to a protected characteristic to be unacceptable.

Capital Sky treats bullying and harassment with equal seriousness.

Your Responsibilities

It is your duty to treat people with respect, considering their feelings and well-being in what you say or do. What may be acceptable to one person may upset or intimidate another.

This policy applies to all forms of communication, including:

- Face-to-face conversations
- Telephone calls
- Text messages and messaging apps
- Emails
- Social media posts
- Online platforms and digital communication

Harassment or bullying delivered through digital means is treated in the same way as in-person behaviour.

Examples of Unacceptable Behaviour

The following are examples of behaviour that may constitute harassment or bullying:

- Coarse or insensitive jokes and pranks
- Coarse or insensitive comments about appearance or character
- Display or distribution of offensive material (written, digital, or pictorial)
- Deliberate exclusion or isolation from conversation or activities
- Unwelcome familiarity or physical contact
- Abusive, insulting, or threatening language
- Demands or threats to intimidate or obtain favours
- Threatened or actual violence
- Online harassment, offensive messages, or inappropriate social media activity

This list is not exhaustive.

Capital Sky senior management will investigate all allegations of such behaviour. Offenders are liable to disciplinary action and, in serious cases, dismissal.

Where You Encounter Harassment or Bullying

If you feel you are being harassed or bullied, the first step is to make clear that you want the behaviour to stop. Tell the person responsible that you find their behaviour unacceptable. Early, direct communication often resolves issues quickly.

Alternatively, you may seek the help of a trusted colleague and ask them to approach the person on your behalf.

If the behaviour continues, or if the incident is serious, please follow the Grievance Procedure.

Confidentiality and Support

Capital Sky assures you that:

- All complaints will be handled promptly, sensitively, and confidentially
- You will not be victimised for raising a concern in good faith
- Support will be offered to any employee affected by harassment or bullying
- Appropriate action will be taken against perpetrators, including subcontractors or third parties

However, malicious or knowingly false complaints will be investigated under the disciplinary procedure.

Third-Party Harassment

Harassment or bullying by clients, subcontractors, suppliers, or visitors will not be tolerated.

Capital Sky will take reasonable steps to prevent and address such behaviour, including:

- Intervention and corrective action
- Removal from site
- Reporting to the relevant employer or authority
- Termination of business relationships where appropriate

Any employee, worker, or subcontractor who experiences harassment from a third party should report the matter immediately to their manager or to senior management. All reports will be taken seriously and investigated promptly and confidentially.

Disciplinary Action

Any employee, subcontractor, or worker found to have engaged in bullying or harassment will be subject to appropriate action.

For employees, this may result in disciplinary action up to and including summary dismissal for gross misconduct.

For subcontractors, agency workers, or consultants, this may result in removal from site, termination of contracts, and notification to their employer.

Where conduct may constitute a criminal offence, Capital Sky may report the matter to the police.

Prevention and Training

Capital Sky is committed to preventing bullying and harassment through:

- Clear policies and procedures
- Induction and awareness training
- Management training on recognising and addressing unacceptable behaviour
- Prompt investigation of complaints
- Ongoing monitoring of workplace culture

Managers and supervisors are expected to lead by example and take immediate action where inappropriate behaviour is observed or reported.

Monitoring and Review

Capital Sky will monitor complaints, investigations, and outcomes to identify trends and ensure this policy remains effective.

This policy will be reviewed annually, or sooner if there are changes in legislation, guidance, or organisational requirements.

Name: Martin Maloney

Position: Chief Executive Officer

Signature:



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