



SEXUAL HARASSMENT POLICY

NWH Group Limited
Reviewed- January 2026

Overview

This sexual harassment policy aims to foster a safe and respectful working environment for all employees. It is aligned with our *Bullying and Harassment Policy* and outlines clear expectations for behaviour, reporting mechanisms, and preventive measures. We take all forms of harassment, including sexual harassment, seriously and have implemented several safeguards to mitigate risks.

Policy Applicability

This policy applies to all employees, contractors, agency workers, and job applicants. Sexual harassment, as defined under the Equality Act 2010, is illegal and strictly prohibited. It can occur between individuals of any gender identity and from anyone in a professional context, including colleagues, supervisors, customers, or third-party vendors.

Definition of Sexual Harassment

Sexual harassment includes any unwanted behaviour of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Examples of sexual harassment may include, but are not limited to:

- Lewd or abusive sexual comments regarding appearance or body.
- Unwelcome physical contact of a sexual nature.
- Displaying sexually explicit materials.
- Asking intrusive questions about someone's sex life.
- Making sexual propositions or advances, either in person or digitally.

Sexual harassment may also include less favourable treatment if an individual has rejected or submitted to such behaviour. This could manifest through blocked promotions, denied training, or exclusion from opportunities

Roles and Responsibilities

Managers and Senior Leadership are expected to set the tone for a respectful workplace and ensure that preventive measures are actively upheld. To this end:

Mandatory Training:

All managers, team leaders, and senior leaders are required to complete e-learning courses on Equality, Diversity, and Inclusion (EDI) and sexual harassment through the iHASCO platform.

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New Starters:

New employees will receive education on sexual harassment as part of the induction process to ensure they understand their rights and responsibilities regarding this policy.

Risk Assessment:

The HR department maintains a sexual harassment risk assessment. It is stored on SharePoint and the Zdrive and is available upon request.

Reporting and Support Mechanisms

Employees who experience or witness sexual harassment are encouraged to report incidents to their line manager or HR. Complaints will be handled sensitively and in line with ACAS guidelines.

Complaints will be:

- Investigated fairly and confidentially.
- Resolved either informally, where possible, or through formal grievance procedures if necessary.

Conclusion

This policy reiterates our commitment to a workplace free of harassment. By promoting awareness, enforcing preventive measures, and offering robust support systems, we aim to create a professional, inclusive, and respectful working environment for all.

Signed:

Date: 15/01/2025

Gavin Money

Managing Director

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