**VEEVE Anti-Harassment & Bullying Policy**

Introduction

It is Veeve’s policy to maintain a non-discriminatory working environment that is free from harassment or bullying based on age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or religious or philosophical belief, sex or sexual orientation. In this policy, these are called the ‘anti-harassment protected characteristics’.

Employees must not harass, bully or intimidate other employees for reasons related to an anti-harassment protected characteristic. Such harassment not only contravenes the Company's policy but it may also constitute unlawful discrimination. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure and could render the employee liable to summary dismissal. Employees should bear in mind that they can be held personally liable for any act of unlawful harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

All employees are responsible for conducting themselves in accordance with this policy and the Company will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers.

Repeated and substantiated complaints by a Manager about the standard of an employee’s performance and/or conduct do not constitute harassment and are outside the scope of this policy.

It is the responsibility of all employees to eliminate any harassment, bullying or intimidation of which they are aware by informing their Line Manager of suspected cases.

All allegations of harassment or bullying will be thoroughly and promptly investigated. Where allegations are substantiated, appropriate disciplinary action, up to and including dismissal, will be taken against any person responsible. We will also take appropriate action against any third parties who are found to have committed an act of harassment against our employees.

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, such as business trips and work-related social events.

Forms of Harassment and Bullying

Harassment and bullying take many forms, ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. Whatever form they take, harassment or bullying are always serious and are totally unacceptable.

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.

An employee harasses another employee if they engage in unwanted conduct related to an anti-harassment protected characteristic, and the conduct has the purpose or effect of violating the other employee’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

An employee also harasses another employee if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an employee harasses another employee if they, or a third party, engage in unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, which has the purpose or effect of violating the other employee’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee, and because of that other employee’s rejection of, or submission to, the conduct, they treat that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the anti-harassment protected characteristic of a third party with whom the employee is associated, and not on the employee’s own protected characteristic, or if it was directed at someone other than the employee, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular anti-harassment protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a joke or as office banter may offend another person. This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable.

Behaviour which a reasonable person would realize would be likely to offend an employee will always constitute harassment without the need for the employee having to make it clear that such behaviour is unacceptable; for example, touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee; for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or by their conduct, that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

Harassment or bullying may be physical, written, verbal or non-verbal. Examples include:

1. Unwanted sexual attention, requests for sexual favours, or physical contact.
2. Lewd, suggestive or over-familiar behaviour.
3. Insults, derogatory comments, ridicule or 'jokes' related to an anti-harassment protected characteristic.
4. Display or circulation of sexually suggestive or racially sensitive material, or material which is otherwise derogatory in relation to an anti-harassment protected characteristic.
5. Displaying abusive or offensive writing or material.
6. Abusive, threatening or insulting words, behaviour, language or mockery, including abusive or demeaning comments about appearance.
7. Unfair allocation of work.
8. Deliberate exclusion from workplace conversations, relevant work-related matters or social activities.
9. The use of nicknames related to, or picking on or ridiculing an employee, because of an anti-harassment protected characteristic.
10. Any other conduct based on an anti-harassment protected characteristic which may be intimidating or abusive to another person.

These examples are not exhaustive, and disciplinary action at the appropriate level will be taken against employees committing any form of harassment, bullying or intimidation.

Informal Complaint

Werecognise that complaints of harassment and bullying (particularly of sexual harassment) can sometimes be of a sensitive or intimate nature. In these circumstances, you are encouraged to raise such issues with a senior person of your choice (whether or not that person has a direct supervisory responsibility for you) as a Confidential Assistant. This person **cannot** then be the person who will be responsible for investigating the matter if it becomes a formal complaint.

If you are the victim of minor harassment, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask them to stop. If you feel unable to do this verbally, then you should hand a written request to the harasser, and your Confidential Assistant can help you in this.

Formal Complaint

If you believe you have been subjected to harassment because of an anti-harassment protected characteristic or bullying (whether by a fellow employee or third party), you should follow the Company’s Grievance Procedure.

In view of the sensitivity of this subject, you may, if preferred, approach a Senior Manager or HR representative directly, rather than your immediate Line Manager. In either case, we will treat the matter as strictly confidential. However, to investigate an allegation, we must be able to determine the scope of the investigation and the individuals who should be informed or interviewed. For example, your identity and the nature of the allegations must be revealed to the alleged harasser so that they are able to fairly respond.

If possible, you should keep notes of the harassment so that the written complaint can include:

1. Name of the alleged harasser.
2. Nature of the alleged harassment.
3. Dates and times when the alleged harassment(s) occurred.
4. Name(s) of any witnesses.
5. Any action already taken by you to stop the alleged harassment.

Upon receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or their suspension with pay until the matter has been resolved.

The person dealing with the complaint will carry out a thorough investigation in accordance with the Grievance Procedure. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter. Your complaint will also be dealt with in accordance with the Grievance Procedure.

When the investigation has been concluded, a draft report of the findings and of the investigator's proposed decision will be sent, in writing, to you and to the alleged harasser.

If you, or the alleged harasser, are dissatisfied with the draft report or with the proposed decision, this should be raised with the investigator within five working days of receiving the draft. Any points of concern will then be considered by the investigator before a final report is sent, in writing, to you and to the alleged harasser. If you are still dissatisfied, you may appeal in accordance with the Grievance Procedure.

General Comments

If the report concludes that the allegation is well-founded, the harasser will be subject to disciplinary action in accordance with the Disciplinary Procedure.

Insofar as possible, we will also take appropriate action against a third party harasser. If you bring a complaint of harassment, you will not be victimised for having brought the complaint. However, if the report concludes that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.