



Bullying and Harassment

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Department: Human Capital

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Summary

- Bullying and harassment will not be tolerated by DP World.
- Where an employee is being bullied or harassed, the employee may try to resolve the matter informally.
- Where it is not possible to resolve matters informally, employees may file a formal complaint in accordance with this policy.
- DP World will take all possible steps to resolve complaints quickly and fairly.

1. Purpose

- 1.1. DP World is committed to providing a working environment free from bullying and harassment and ensuring all staff are treated, and treat others, with dignity and respect.
- 1.2. This policy covers bullying or harassment which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions.

2. What are Bullying and Harassment?

- 2.1. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined 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.
- 2.2. 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.
- 2.3. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.
- 2.4. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief or gender. Harassment is unacceptable even if it does not fall within any of these categories.
- 2.5. The table below contains examples of behaviour may be considered to be bullying or harassment. The table is illustrative only and should not be considered as exhaustive.

Bullying	Harassment
Physical or psychological threats	Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing
Unnecessarily overbearing and intimidating levels of supervision	Continued suggestions for social activity after it has been made clear that such suggestions are

	unwelcome
Inappropriate and/or derogatory remarks about someone's performance	Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet)
	Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
	Racist, sexist or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender
	Offensive e-mails, text messages or social media content
	Mocking, mimicking or belittling a person's disability
	Forcing an employee to carry out work in inhumane ways.
	Exploiting or repeatedly requiring an employee to work beyond the normal working schedules or during unsocial working hours (without a genuine business reason for doing so)

- 2.6. For the avoidance of doubt, legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

3. How to Deal with Bullying or Harassment

- 3.1. If an employee is being bullied or harassed, the employee should consider whether they feel able to raise the problem informally with the person responsible. The employee should explain clearly to them that their behaviour is not welcome or makes the employee feel uncomfortable. If this is too difficult or embarrassing, employees should speak to their LM or the HC Department, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 3.2. If informal steps are not appropriate, or have been unsuccessful, employees should follow the formal procedure set out below.

4. Raising a Formal Complaint

- 4.1. If issues cannot be resolved informally, employees should submit a complaint to HC Department. The complaint should:
- a) contain a full description of the nature of the complaint; and
 - b) include the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 4.2. The complaint will then be dealt with as a grievance and will be dealt with as outlined in the Grievance Policy.

5. Potential Sanctions

- 5.1. Where DP World considers that harassment or bullying has occurred, prompt action will be taken to address it as follows:

Where the bully or harasser is a/an:	Action
Employee	The matter will be dealt with as a case of misconduct or gross misconduct under the Disciplinary Policy
Third Party (such as customer or other visitor)	DP World will consider what action would be appropriate to deal with the problem. Whether or not the complaint is upheld, DP World will consider how best to manage any ongoing working relationship between the individuals concerned.

- 5.2. Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under the Disciplinary Policy.

6. Related Standards, Policies and Processes

This policy should be read in conjunction with:

- a) Equal Opportunities;
- b) Anti-Discrimination Policy;
- c) Disciplinary Policy;
- d) Grievance Policy.

7. Revision History

Revision	Details
Date of changes	
Policy owner	
Summary of changes	

8. Contact Information

All queries in relation to this policy should be directed to HC Department.