

ARQIVA

**Sexual Harassment
Policy**

Sexual Harassment Policy

1. Scope

This policy applies to all Arqiva colleagues whether permanent, temporary, consultants, self-employed contractors, agency workers, part-time or on a fixed term contract.

2. Introduction and Purpose

Arqiva is committed to fostering an environment where every colleague is supported and treated with dignity and respect at work and when representing the Company in any capacity.

Arqiva takes a zero-tolerance approach against sexual harassment in any form and colleagues should conduct themselves in a manner that promotes belonging and inclusion. Sexual harassment or victimisation of any colleague, or anyone they come into contact with during the course of their work, is unlawful under the Equality Act 2010 and will not be tolerated.

The law requires Arqiva to take reasonable steps to prevent sexual harassment of all colleagues during the course of their employment. We will take active steps to help prevent the sexual harassment and victimisation of all colleagues. Anyone who is a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support.

Arqiva will always take any allegations of sexual harassment seriously and handle them fairly, sensitively and promptly. Any allegations of sexual harassment may be investigated under the Disciplinary and Appeals policy and which may lead to disciplinary action, which could include dismissal for gross misconduct if they are committed.

3. What is Sexual Harassment?

The law defines sexual harassment as unwanted physical, verbal or non-verbal conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is also treating someone less favourably because of a rejection of, or submission to, unwanted conduct of a sexual nature or unwanted conduct related to sex or gender reassignment.

Unwanted means the same as unwelcome or uninvited. It means that it is unwanted by the person who is being sexually harassed. It is important to note that sexual conduct which has in the past been wanted, can become unwanted and the person receiving the behaviour decides if it is unwanted.

It is important to remember that even if there is no intention to cause distress, it can still have the effect of violating someone's dignity or creating an intimidating environment. A colleague may also be sexually harassed if they were not the intended target.

Sexual harassment can be a one-off incident or ongoing and can occur in many forms including in person, in writing or online via social media and email. It can occur in any situation related to work such as social events, an organised leaving party or after work drinks, as well as on social media. It can be against a colleague or other person related to Arqiva, or anyone outside of work where the conduct relates to your suitability to carry out your role.

Sexual harassment can take place at any level (including experience or seniority) and within any relationship, including third parties. It can also be related to any gender, sexual orientation or any other protected characteristic.

The following are examples of sexual harassment, but this is not intended to be an exhaustive list:

- Sexual comments or jokes, including describing a person's physical appearance in a sexual manner;
- Displaying or circulating sexually graphic pictures or posters. This may include showing these on mobile phones;
- Suggestive looks, staring or leering;
- Propositions and sexual advances (after it has been made clear that such suggestions are unwanted), including using a position of power or seniority to make such advances;
- Making promises in return for sexual favours;
- Sexual gestures;
- Intrusive questions about an individual's private or sexual life, or an individual discussing their own sex life;
- Sexual posts or contact on social media (including but not limited to LinkedIn, Facebook, Instagram, TikTok or Snapchat);
- Spreading sexual rumours about a person;
- Sending sexually explicit emails or text messages; and

- Unwelcome and inappropriate touching, hugging, massaging, kissing, patting, pinching, grabbing or groping.

If an experience you have had or witnessed is not listed above or if you are unsure whether it constitutes sexual harassment, we encourage you to come forward and follow the appropriate steps in the section below.

4. Raising a Concern

There are no time constraints around reporting an incident of sexual harassment as we know it can take colleagues time to feel comfortable to come forward. However, we do encourage colleagues to come forward as soon as they can, so we have the best chance of investigating and resolving the situation.

We encourage anyone who feels they have experienced sexual harassment or witnessed sexual harassment against another colleague to come forward with their concerns. Any colleagues who comes forward will not be treated unfavourably for speaking up.

4.1 Raising a Concern Informally

Depending on the severity and if you feel comfortable to do so, you are encouraged to raise your concerns with the individual themselves to explain how their actions are making you feel and ask them to stop. Alternatively, if you have witnessed sexual harassment and feel comfortable to do so, we encourage you to intervene at the time of the incident.

If you do not feel comfortable speaking to the individual but would still like to raise the matter informally, we encourage you to talk to your line manager, or another manager, who can speak to them on your behalf should you wish.

4.2 Raising a Concern Formally

If you do not feel comfortable or it is inappropriate to raising the issue informally or informal attempts have been unsuccessful, we encourage you to raise a formal complaint via the Grievance Policy, although other ways of raising a concern are available below.

When raising a grievance, we ask you or a nominated colleague raising this on your behalf if that would make you feel more comfortable to provide the following information:

- The name(s) of those involved;
- The nature of the alleged harassment and/or victimisation;
- The dates and times when the alleged harassment and/or victimisation has occurred;
- The names of any witnesses; and
- Any action already taken by you to stop the alleged harassment and/or victimisation.

We do recognise there are times where you may not feel comfortable providing the above information in writing and would discuss with you the best way of communicating this.

Whilst we investigate your concerns, we will take action where appropriate to separate you from colleagues involved.

If you are raising concerns in relation to a third party, we will work closely with external key stakeholders to ensure this is investigated appropriately.

4.3 Other Ways of Raising a Concern

If you do not feel comfortable raising concerns with your line manager, you can raise concerns with the People & Culture team by raising a Service Request via Oracle HCM or by calling them on 0333 032 4900.

You can also contact our confidential Speak Up Hotline or use the Speak Up online reporting system. Both of these options can be done anonymously. Contact details can be found on the company intranet or at [Arqiva.com](https://www.arqiva.com).

Our colleague forums such as AEB and BECTU are available to support you where you need guidance or signposting on how to raise any concerns.

5. Responsibilities

5.1 Line Managers

Line managers have a specific responsibility to set an appropriate standard of behaviour and for creating an inclusive culture so that any incidences of sexual harassment are robustly challenged and

addressed. Line managers are expected to role model these behaviours.

If a colleague reports an incident of sexual harassment to you, you must take it seriously, be sensitive and promptly seek advice from the People Services team by raising a Service Request via Oracle HCM or by calling them on 0333 032 4900.

5.2 Colleagues

All colleagues and representatives of Arqiva have a responsibility to create an inclusive culture which is free from sexual harassment and take appropriate steps to address it. Depending on the circumstances this could include:

- Intervening where you feel able to do so;
- Supporting the victim to report it or reporting it on their behalf;
- Reporting the incident where you feel there may be a continuing risk if you do not report it; or
- Co-operating in any investigation into the incident

All witnesses will be provided with appropriate support and will be protected from victimisation.

6. Support Available

We understand that this may be a distressing time for all colleagues involved and therefore remind you that our Employee Assistance Programme (EAP) is available to support all colleagues 24/7. Details of how to contact the EAP can be found on the Company's intranet.

Our mental health first aiders are trained to support our colleagues by listening non-judgementally and signposting where appropriate. Details of our mental health first aiders and how you can contact them can be found on the Company's intranet.

Our colleague forums such as AEB and BECTU may be able to provide further support and assistance during formal processes.

7. Confidentiality

In line with our values, we will deal with all allegations in a sensitive and appropriate manner adhering to no recordings of these meetings without prior permission. This is to encourage openness and full participation. Any breach of this may lead to disciplinary action, which could include dismissal.

8. Abuse of this policy

Any abuse in the application of this policy or any allegations proven to be deliberately malicious, may be dealt with in accordance with Arqiva's Disciplinary and Appeals Policy and may result in disciplinary action being taken, up to and including summary dismissal.

9. Applicability

This policy does not form part of a colleague's contract of employment. We review this policy on a regular basis and may amend or withdraw it at our absolute discretion to ensure it meets business needs and adheres to any changes to legislation.

For colleagues who are not current Arqiva employees, the application of this policy may be different, but the spirit and intent of this policy should be followed to achieve a resolution for all parties.

10. Further Information

If a colleague has any questions about this policy, please raise them in the first instance with your line manager. For any further queries, please raise a HR Service Request within Oracle HCM.

Electronic signature in IMS

David Green

Director of HR Operation

10th September 2025

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