

# SEXUAL HARASSMENT POLICY

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## 1. Scope of the Policy

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd are committed to providing a safe environment for all its' employees, free from discrimination on any grounds and from harassment at work, including sexual harassment. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence, including those made against a third party. No-one will be victimised for making such a complaint.

## 2. Definition of Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them, whether the perpetrator intended this or not. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment or for special treatment.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitutes sexual harassment include, but are not limited to:-

### Physical Conduct

- Unwelcome physical gestures including patting, pinching, stroking, kissing, hugging, fondling or inappropriate touching.
- Physical violence, including sexual assault.
- Physical contact, e.g. touching, massaging etc
- The use of job-related threats or rewards to solicit sexual favours.
- Intrusion of personal space

### Verbal Conduct

- Comments on a worker's appearance, age, private life etc.
- Sexual comments, stories and jokes.
- Sexual advances.
- Repeated and unwanted social invitations for dates or physical intimacy.
- Insults based on the sex or sexual identification of the worker.
- Condescending or paternalistic remarks.

### **Non-Verbal Conduct**

- Display sexually explicit or suggestive material.
- Sexually suggestive gesture(s).
- Whistling at someone.
- Suggestive looks, staring or leering
- Sending sexually explicit emails or text messages

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of Goss Springs Ltd and Press & Multi-Slide Tooling Ltd, clients, customers, casual workers, contractors, suppliers or visitors who sexually harass another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within Goss Springs Ltd and Press & Multi-Slide Tooling Ltd premises or outside, including at social events, business trips, training sessions, on social media or any online communication such as emails, video calls, phone calls or instant messaging platforms.

### **3. Complaints Procedure**

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, they can approach one of the designated staff members responsible for receiving complaints of sexual harassment, i.e. a member of HR or another member of the senior management team.

When a designated person receives a complaint of sexual harassment, they will:

- Immediately record the dates, times and facts of the incident(s).
- Ascertain the views of the victim as to what outcome they want.
- Ensure that the victim understands the Company's procedures for dealing with the complaint.
- Discuss and agree the next steps; either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if they is not satisfied with the outcome.
- Keep a confidential record of all discussions.
- Respect the choice of the victim.
- Ensure that the victim knows that they can lodge the complaint outside of the Company through the relevant country/legal framework.

Throughout the complaints procedure, a victim is entitled to seek help from a counsellor or therapist or to discuss with HR through the welfare programme. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims

often feel that they cannot come forward. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd understands the need to support victims in making complaints.

### **3.1 Informal Complaints Mechanism**

If the victim wishes to deal with the matter informally, the designated person will:

- Give an opportunity to the alleged harasser to respond to the complaint.
- Ensure that the alleged harasser understands the complaints mechanism.
- Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the Company to resolve the matter.
- Ensure that a confidential record is kept of what happens.
- Follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped.
- Ensure that the above is done speedily and within 10 working days of the complaint being made.

### **3.2 Formal Complaints Mechanism**

If the victim wants to make a formal complaint or if the informal complaints mechanism has not led to a satisfactory outcome for the victim, the formal complaints mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to the Human Resources Manager or the General Manager to instigate a formal investigation. This may be dealt with by him/herself or they may refer the matter to an internal or external investigator as appropriate.

The person carrying out the investigation will:

- Interview the victim and the alleged harasser separately.
- Interview other relevant third parties separately.
- Decide whether or not the incident(s) of sexual harassment took place.
- Produce a report detailing the investigations, findings and any recommendations.
- If the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e. an apology, a change to working arrangements, training for the harasser, discipline, suspension, dismissal).
- Follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome.
- If it cannot be determined that the harassment took place, they may still make recommendations to ensure proper functioning of the workplace.
- Keep a record of all actions taken.
- Ensure that all the records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within 10 days of the complaint being made.

### **3.3 External Complaints Mechanism**

A person who has been subject to sexual harassment can also make a complaint outside of the Company. They can do so through the police or employment tribunal.

### **3.4 Sanctions and Disciplinary Measures**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- Verbal or written warning.
- Final written warning
- Reduction in wages
- Behaviour Agreement
- Apology to those affected
- Compulsory training/retraining
- Suspension.
- Dismissal.

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivia. Certain serious cases, including physical violence, will result in immediate dismissal of the harasser.

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises that it is the right of the reporter to be informed of the outcomes and sanctions in disciplinary cases, where they were the victim.

### **3.5. Appeals**

Both the reporter and the alleged harasser may appeal an outcome, on limited grounds:

- Whether the correct procedure was followed
- Where there is substantial new evidence.
- Whether the outcome was wrong or unfair.

Appeals should be made within 1 month of the notification of the outcome and should be sent to the HR Manager or the General Manager.

Any request for an appeal must include who it is from, that it is a request for an appeal and the reason for the request. Upon receipt an investigator must be appointed who was not involved with the original case and decide whether there are grounds for appeal.

If it is decided that there are grounds for appeal, a decision as to whether additional investigation should be undertaken, only if that is necessary, and the findings and any changes to the original decision and sanctions communicated to the relevant parties. The decision of the person hearing the appeal is final.

## **4. Responsibility**

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd have a zero tolerance for sexual harassment but it is the duty of everyone who works for the Company or any third-party contacts to ensure that sexual harassment in the workplace does not take place.

#### **4.1 Duties of Employers**

Employers have a legal duty to provide a safe working environment and ensure swift and effective action in recording and responding to a report of sexual harassment. Failure to do so can result in legal liability for any sexual harassment that occurs. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd will:

- Ensure workers have access to confidential support and advice services during work hours and are encouraged to seek outside support should they need it. This includes ensuring there are designated members of staff responsible for receiving reports of sexual harassment.
- Establish effective recording and reporting mechanisms for both informal and formal reporting routes.
- Ensure those who are approached with a report of sexual harassment know how to respond and record information and will follow the Complaints Procedure outlined in Section 3 above.
- Throughout the complaints procedure the victim is entitled to be supported by a member of staff who has received enhanced training in responding to sexual harassment. The Company will offer specialist training to staff who wish to volunteer to assist victims of sexual harassment. The Company recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel they cannot come forward. Goss Springs Ltd and Press & Multi-Slide Tooling Ltd understands the need to support victims in making complaints.

#### **4.2 Duties of Managers and Supervisors**

All managers and supervisors have a responsibility for:

- Creating an inclusive culture and environment so that any incidence of sexual harassment and/or victimisation are robustly challenged and tackled;
- Treating informal and formal complaints seriously, with sensitivity to the feelings, perceptions and need for confidentiality of the individual raising the report;
- Treating their workers fairly and taking prompt action where they are aware of unacceptable behaviour; and
- Ensuring that staff who report sexual harassment, or support others to do so, are not treated less favourably than others because of this (victimisation).
- Ensuring that any recommended disciplinary and/or remedial action is carried out. Any failure by a line manager to ensure that this is completed in a timely manner is in itself likely to constitute misconduct.
- Assessing and managing risk arising from disclosures, reports and disciplinary process.
- Deal swiftly and explicitly with third party perpetrators with the view to banning individuals from premises or ending contracts.
- Ensuring this policy is followed at all times.
- Ensuring that they and their team have received sexual harassment training.
- Being an exemplar of acceptable behaviour and being aware that they are in positions of power as well as leadership.

#### **4.3 Duties of Individuals**

All workers have a clear role to play in creating a work environment in which sexual harassment is not acceptable. All workers should:

- Ensure they understand this policy and act in accordance with it, particularly if they are an alleged perpetrator of unacceptable behaviour.
- Fully cooperate with any investigation and take seriously requests to cease or amend behaviour.
- Not participate in, encourage or condone sexual harassment or victimisation of others;
- Promote an inclusive culture in which colleagues or peers are not subjected to sexual harassment or victimisation by challenging and/or reporting these forms of behaviour to the appropriate member of staff.
- Treat all workers and those they encounter through work with dignity and respect.
- Think about their own behaviour and whether it might amount to sexual harassment and change their behaviour.

#### **4.4 Support for Staff who have Experienced Sexual Harassment**

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd commits to making sure that reasonable adjustments are made for the reporter, in terms of individual risk and needs assessment, that might include time off work for counselling or to take legal advice.

If you have experienced sexual harassment at work you can contact the following organisations for free and confidential support and advice:

- ACAS [www.acas.org.uk](http://www.acas.org.uk)
- Rights of Women – free and confidential legal helpline for women who have experienced sexual harassment at work – 0207 490 0152
- Galop, the LGBT+ anti-violence charity – 0800 999 5428
- Citizens Advice Bureaux
- Equality and Human Rights Commission (EHRC)

### **5. Implementation of this Policy**

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd will ensure that this policy is widely disseminated to all employees. All new employees must be trained on the content of this policy as part of their induction into the Company.

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd will require all employees to attend a training course on the content of this policy and any update will be communicated to them. Copies of this policy will be shared electronically to all employees and will be verbally communicated to all new employees during the induction process. Hard copies will be available as an appendix to the Employee Handbook.

It is the responsibility of every manager to ensure that all his/her employees are aware of this policy.

## 6. Monitoring and Evaluation

Goss Springs Ltd and Press & Multi-Slide Tooling Ltd recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.

This policy cross-refers to and has implications for the Company's

- Bullying and harassment policy
- Grievance procedure
- Use of Computers, Internet and Email policy
- Induction procedure

Every effort has been made to ensure these policies are aligned. In all matters relating to sexual harassment, this sexual harassment policy takes precedence.

Two handwritten signatures in black ink, one appearing to be "N Goss" and the other "D Goss".

Mr N Goss – Managing Director  
Mr D Goss – Managing Director

March 2026

