

R&M POLICY · PEOPLE AND ETHICS

Prevention of Sexual Harassment Policy

Worker Protection (Amendment of Equality Act 2010) Act 2023

R&M Property Group Ltd

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1. Director's Statement

R&M Property Group Ltd is committed to providing a working environment in which all individuals are treated with dignity and respect, free from sexual harassment and any form of unwanted conduct of a sexual nature. Sexual harassment is unlawful, unacceptable, and will not be tolerated under any circumstances - whether it occurs on our construction sites, in our offices, at work-related events, or through any form of communication including digital and social media.

The construction industry has historically been a male-dominated sector, and I recognise that this creates an environment in which sexual harassment can occur and can go unchallenged if the right culture, systems, and leadership are not in place. R&M is committed to changing that. We want every person who works on or visits our projects - regardless of their sex, gender, sexual orientation, or any other characteristic - to feel safe, respected, and able to do their best work.

The Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into force on 26 October 2024, places a new legal duty on employers to take reasonable steps to prevent sexual harassment of their employees. This policy sets out how R&M meets that duty. It goes beyond the minimum legal requirements because preventing sexual harassment is not just about legal compliance - it is about building the kind of company and the kind of industry that we want to be part of.

I take personal responsibility for the implementation of this policy and for ensuring that every individual associated with R&M understands that sexual harassment will never be tolerated.

Thom McKenna, Director, R&M Property Group Ltd

2. Legal Framework

This policy is informed by and ensures compliance with the following legislation:

2.1 Equality Act 2010

Section 26 of the Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person. The Act also protects against less favourable treatment of a person because they have submitted to or rejected unwanted conduct of a sexual nature or related to gender reassignment or sex. Sexual harassment is a form of discrimination related to the protected characteristic of sex.

2.2 Worker Protection (Amendment of Equality Act 2010) Act 2023

This Act, which came into force on 26 October 2024, amends the Equality Act 2010 to impose a new preventative duty on employers. Under this duty, employers must take reasonable steps to prevent sexual harassment of their employees in the course of their employment. This is a proactive, anticipatory duty - it requires employers to act before harassment occurs, not simply to respond after the event.

The Equality and Human Rights Commission (EHRC) has the power to take enforcement action against employers who breach the preventative duty, even where no individual complaint has

been made. Where a sexual harassment claim is upheld by an employment tribunal and the tribunal finds that the employer has breached the preventative duty, the tribunal may uplift compensation by up to twenty-five per cent.

The reasonable steps that R&M takes to comply with this duty are set out throughout this policy and are summarised in Section 10.

2.3 Third-Party Harassment

The preventative duty extends to harassment by third parties - that is, harassment of R&M employees by individuals who are not employed by R&M. In the context of construction, this includes harassment by subcontractor operatives, agency workers, Client Organisation representatives, members of the public, consultants, visitors to site, and any other person with whom R&M employees come into contact in the course of their work. R&M takes reasonable steps to prevent third-party harassment and will take action where it occurs.

2.4 Other Relevant Legislation

Depending on its nature and severity, sexual harassment may also constitute a criminal offence under the Protection from Harassment Act 1997, the Sexual Offences Act 2003, the Malicious Communications Act 1988, or the Communications Act 2003. R&M will report matters to the police where there are reasonable grounds to believe that a criminal offence has been committed.

3. Scope

This policy applies to:

- All directors, employees, and workers of R&M Property Group Ltd, whether on permanent, fixed-term, or casual contracts
- All agency workers and labour-only subcontractor operatives working on R&M projects
- All subcontractors, consultants, and professional advisors engaged by R&M while on R&M premises or projects
- All visitors to R&M offices or construction sites

The policy applies to conduct that takes place:

- On any R&M construction site, in any R&M office, or at any R&M premises
- At work-related events, including training courses, conferences, team-building activities, social events, and client entertainment
- During travel connected with work
- Through any form of communication, including email, text messages, instant messaging, social media, telephone calls, video calls, and any other digital platform, where the communication is connected with work or involves individuals who have a work relationship

R&M's commitment to preventing sexual harassment extends to protecting all individuals on our projects, including the employees of subcontractors and Client Organisations. Where a complaint is made about the conduct of a subcontractor operative or a third party, R&M will take appropriate action even though the individual is not directly employed by R&M.

4. What Constitutes Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature. It can take many forms and can be directed at any person regardless of their sex, gender, or sexual orientation. The following are examples of conduct that may constitute sexual harassment. This list is not exhaustive:

4.1 Physical Conduct

- Unwanted physical contact, touching, groping, pinching, or brushing against someone's body
- Assault or attempted assault of a sexual nature
- Blocking someone's path or invading their personal space in a way that is sexual in nature
- Any form of physical intimidation of a sexual nature

4.2 Verbal Conduct

- Sexual comments, jokes, innuendo, or banter, including comments about a person's body, appearance, clothing, or sex life
- Catcalling, wolf-whistling, or making sexual noises
- Unwelcome sexual advances, propositions, or pressure for sexual activity
- Asking intrusive questions about a person's sex life, sexual orientation, or body
- Making promises of favourable treatment (such as promotion, pay rises, or preferred work assignments) in return for sexual favours
- Making threats of detrimental treatment (such as dismissal, poor assignments, or negative references) for refusing sexual advances
- Spreading sexual rumours or gossip about a person

4.3 Non-Verbal and Visual Conduct

- Displaying, circulating, or sharing sexually explicit or suggestive material, including images, videos, cartoons, screensavers, calendars, or posters - whether in physical form on site or office walls, or in digital form through email, messaging apps, social media, or file-sharing platforms
- Sexual gestures, staring, leering, or suggestive looks
- Sending unsolicited sexually explicit messages, images, or videos (including through personal devices and social media)

4.4 Digital and Online Harassment

- Sending sexually explicit or inappropriate messages via WhatsApp, text, email, or any other digital platform to a colleague or someone connected with work
- Sharing or forwarding sexual content in work group chats
- Making sexual comments about a colleague on social media
- Cyberstalking or repeated unwanted contact of a sexual nature through digital means

4.5 Important Principles

Whether conduct constitutes sexual harassment depends on whether it is unwanted and whether it has the purpose or effect described in the Equality Act. The following principles apply:

- It is the impact on the recipient that matters, not the intention of the person responsible. Conduct that is intended as a joke or as banter can still constitute sexual harassment if it is unwanted and has the relevant effect

- A single incident can constitute sexual harassment if it is sufficiently serious. There is no requirement for a pattern of behaviour
- The recipient does not need to have told the person responsible that the conduct is unwanted for it to constitute harassment. However, it is good practice to make this clear where it is safe and reasonable to do so
- Sexual harassment can be directed at any person regardless of their sex. It can occur between people of the same sex or different sexes
- A person who witnesses sexual harassment directed at someone else can also bring a claim if the conduct creates an intimidating, hostile, degrading, humiliating, or offensive environment for them

5. Construction Industry Context

R&M recognises that the construction industry presents specific challenges in relation to sexual harassment. Research by the Chartered Institute of Building (CIOB), the National Federation of Builders, and other industry bodies has consistently found that sexual harassment is underreported in construction, that women and LGBT+ workers in the sector experience disproportionately high levels of inappropriate conduct, and that a culture of banter and normalisation can prevent individuals from reporting or challenging unacceptable behaviour.

R&M is committed to addressing these industry-specific risks through the following measures:

- Construction site culture: R&M sets clear behavioural expectations from the first day of site induction. The display of sexually explicit or suggestive material on site - including in welfare facilities, site offices, and on personal devices where visible to others - is prohibited. Sexual jokes, banter, catcalling, and comments about appearance are not acceptable, regardless of whether anyone appears to be offended
- Mixed-workforce sites: As the industry diversifies, R&M ensures that welfare facilities are appropriate for all workers, including adequate provision of separate or lockable changing and toilet facilities. Site layout and lighting are reviewed to ensure that all areas of the site are safe and accessible
- Subcontractor operatives: A significant proportion of the workforce on R&M sites is employed by subcontractors rather than by R&M directly. R&M makes clear through site induction, subcontract conditions, and ongoing site management that all workers on site are subject to R&M's standards of behaviour, and that sexual harassment by any person will be dealt with regardless of their employer
- Reporting barriers: R&M recognises that workers in construction may face particular barriers to reporting sexual harassment, including fear of losing work, concerns about not being taken seriously in a male-dominated environment, and the transient nature of site work. R&M addresses these barriers through confidential reporting channels, protection from retaliation, and a culture of visible leadership on this issue

6. Reporting Sexual Harassment

R&M encourages any individual who has experienced or witnessed sexual harassment to report it. Reports can be made through any of the following channels:

- **Direct to the site manager or line manager:** Any concern can be raised verbally or in writing with the individual's direct manager or the site manager on the relevant project.

Where the concern relates to the conduct of the manager themselves, the report should be made to the Compliance Officer or the Director instead

- **Compliance Officer:** Phillip Hollingworth (Spectra Safety) - available to receive reports from any individual, whether directly employed, agency, or subcontractor. Reports can be made by telephone, email, or in person
- **Director:** Thom McKenna - available for any concern, at any time, particularly where the individual feels unable to raise the matter through other channels or where the concern involves a senior member of staff
- **Anonymous reporting:** R&M recognises that some individuals may feel unable to report in their own name. Anonymous reports can be made in writing to the Compliance Officer. While anonymous reports are more difficult to investigate, R&M will take all anonymous reports seriously and will investigate to the extent possible

Reports can be made by any person affected by or aware of sexual harassment, including the person directly subjected to the conduct, a witness, or a colleague who has been told about the conduct by the person affected.

R&M will handle all reports of sexual harassment with sensitivity and confidentiality. Information will only be shared with those who need to know in order to investigate and resolve the matter. R&M recognises the courage it takes to report sexual harassment, particularly in a construction environment, and will ensure that every report is taken seriously and dealt with promptly.

7. Protection from Retaliation (Victimisation)

Under Section 27 of the Equality Act 2010, it is unlawful to subject a person to a detriment because they have made or supported a complaint of sexual harassment, given evidence or information in connection with a complaint, or done anything else in connection with the Equality Act. This is known as victimisation.

R&M guarantees that no individual will suffer any detriment as a result of reporting sexual harassment in good faith, supporting someone who has made a report, acting as a witness, or cooperating with an investigation. This protection applies to all individuals, whether directly employed by R&M, agency workers, or subcontractor operatives. Detriment includes dismissal, disciplinary action, changes to shifts or work allocation, exclusion from work opportunities, bullying, and any other adverse treatment.

Any person who retaliates against someone for raising a sexual harassment concern will themselves be subject to disciplinary action, which may include dismissal or removal from the project. Retaliation is treated as seriously as the harassment itself.

8. Investigation and Outcomes

All reports of sexual harassment are investigated promptly, thoroughly, and fairly. The investigation process is as follows:

8.1 Initial Assessment

Upon receiving a report, the Compliance Officer (or the Director, where the Compliance Officer is unavailable or conflicted) conducts an initial assessment to understand the nature and seriousness of the allegation, to determine whether any immediate protective measures are needed (such as separating the individuals involved, adjusting site assignments, or suspending

a person pending investigation), and to consider whether the matter should be reported to the police.

8.2 Investigation

The investigation is conducted by the Compliance Officer or, where the seriousness or complexity of the case requires it, by an external investigator appointed by R&M. The investigator interviews the person who made the report, the person against whom the allegation has been made, and any witnesses. All interviews are conducted in private. The investigator gathers and preserves any relevant evidence, including messages, emails, CCTV footage, and site records. Both the complainant and the respondent are entitled to be accompanied at any investigation meeting by a colleague or trade union representative.

8.3 Outcomes for R&M Employees

Where the investigation concludes that sexual harassment has occurred on the part of an R&M employee, the matter is dealt with under R&M's disciplinary procedure. Sanctions may include a formal warning, final written warning, mandatory training, transfer or reassignment, demotion, or summary dismissal for gross misconduct. Sexual harassment is regarded by R&M as a potential act of gross misconduct, and a single serious incident may warrant dismissal without prior warnings.

8.4 Outcomes for Subcontractor Operatives and Third Parties

Where sexual harassment is committed by a subcontractor operative, agency worker, or other third party, R&M will require the individual to be permanently removed from the project and from all R&M sites. R&M will notify the individual's employer and require them to take appropriate disciplinary action. Repeated or serious incidents of sexual harassment by a subcontractor's workforce may result in the subcontractor being removed from R&M's approved supplier list.

8.5 Support for the Complainant

R&M recognises that experiencing sexual harassment can have a significant impact on an individual's mental health and wellbeing. R&M will offer appropriate support to the complainant throughout and after the investigation process, including access to R&M's Employee Assistance Programme (EAP), time off where needed, and any reasonable adjustments to their working arrangements or site assignment to ensure that they feel safe and supported.

9. Third-Party Harassment - Preventative Measures

The preventative duty under the Worker Protection Act extends to harassment by third parties. R&M takes the following steps to prevent third-party sexual harassment of its employees:

- Site induction for all subcontractor operatives, agency workers, visitors, and consultants includes a clear statement that sexual harassment will not be tolerated on R&M sites, and that any individual found to have engaged in sexual harassment will be permanently removed from site
- R&M's standard subcontract terms include a clause requiring subcontractors to comply with R&M's behavioural standards and to ensure that their operatives do not engage in sexual harassment or any other form of unlawful discrimination
- Site managers are trained to intervene promptly if they observe or receive a report of inappropriate behaviour by any person on site, regardless of who employs them

- Where R&M employees interact with Client Organisation representatives, members of the public, or other third parties who engage in sexual harassment, R&M will take steps to protect the employee, including raising the matter formally with the relevant organisation and, where appropriate, adjusting the employee's duties to avoid further contact with the individual concerned
- R&M maintains a record of any third-party harassment incidents and takes this into account when assessing whether to continue working with the relevant subcontractor, agency, or organisation

10. Reasonable Steps - Summary of Preventative Measures

The Worker Protection (Amendment of Equality Act 2010) Act 2023 requires R&M to take reasonable steps to prevent sexual harassment. The EHRC's technical guidance identifies a range of steps that employers should consider. R&M has implemented the following:

10.1 Risk Assessment

- R&M has conducted a sexual harassment risk assessment that considers the specific risks arising from the construction environment, including the male-dominated workforce, the presence of multiple employers on site, the use of agency and subcontracted labour, site-based working conditions, and work-related social events
- The risk assessment is reviewed annually and updated following any reported incident or significant change in working arrangements

10.2 Policy and Communication

- This policy has been developed and is communicated to all employees at induction and through annual refresher briefings
- The policy is displayed in summary form on site noticeboards and in welfare facilities
- The policy is included in R&M's employee handbook and is available on request to any worker on an R&M project

10.3 Training

- All R&M employees receive training on the prevention of sexual harassment as part of their induction, covering what constitutes sexual harassment, the impact on victims, the legal framework, the reporting channels, and the company's zero-tolerance approach. Training is refreshed annually
- Site managers and supervisors receive enhanced training on recognising and responding to sexual harassment, including how to handle reports, how to intervene as a bystander, and how to support a colleague who discloses harassment
- The Director and senior managers receive training on their responsibilities under the preventative duty, including the obligation to take reasonable steps and the consequences of failing to do so

10.4 Site Standards

- The display of sexually explicit or suggestive material is prohibited on all R&M sites and premises
- Site inductions include a clear behavioural expectations briefing that covers sexual harassment

- Adequate welfare facilities are provided for all workers, with appropriate provision for privacy and security
- Site lighting and layout are reviewed to ensure safe access and egress for all workers

10.5 Reporting and Response

- Multiple reporting channels are available, including confidential and anonymous routes
- All reports are investigated promptly and thoroughly
- The complainant is protected from retaliation and offered appropriate support
- Outcomes are proportionate and consistently applied

10.6 Monitoring and Review

- R&M monitors the number and nature of sexual harassment reports and uses this data to identify trends and improve preventative measures
- The effectiveness of this policy and the preventative measures are reviewed annually by the Compliance Officer and the Director
- Anonymous workforce surveys may be conducted periodically to assess whether workers feel safe from sexual harassment and confident in the reporting process

11. Responsibilities

- **Thom McKenna (Director):** Overall responsibility for the prevention of sexual harassment within R&M. Approves this policy, ensures that adequate resources are allocated to training and prevention, and sets the cultural tone for the organisation. Reviews all serious incidents personally.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for receiving and investigating reports of sexual harassment, maintaining training records, conducting the annual risk assessment, monitoring compliance, and advising managers on their responsibilities under the preventative duty.
- **Site Managers and Project Managers:** Responsible for setting and maintaining behavioural standards on site, ensuring that inductions include the sexual harassment briefing, intervening promptly when inappropriate conduct is observed or reported, and escalating matters to the Compliance Officer.
- **Louis Howard (Procurement Manager, Enabl):** Responsible for ensuring that subcontract and agency terms include behavioural standards and sexual harassment provisions, and that supply chain partners are aware of R&M's expectations.
- **All Employees:** Every employee has a personal responsibility to conduct themselves with respect and dignity, not to engage in sexual harassment, to challenge inappropriate behaviour where it is safe to do so, and to report any concerns through the channels set out in this policy.

12. Record Keeping

R&M maintains confidential records of all reports of sexual harassment, the investigation process, the findings, and the outcomes. These records will be stored securely by the Compliance Officer with restricted access. Records are retained in accordance with R&M's data retention policy and the requirements of the UK GDPR and the Data Protection Act 2018.

Anonymised data is used to monitor trends and to inform the annual review of this policy and the risk assessment.

13. Related Policies

This policy operates alongside and should be read in conjunction with:

- R&M Equality and Diversity Policy
- R&M Disciplinary Procedure
- R&M Grievance Procedure
- R&M Anti Bribery, corruption and Whistleblowing Policy
- R&M Mental Health and Wellbeing Policy
- R&M Anti-Bullying and Harassment Policy
- R&M Social Media and Communications Policy

14. Policy Review

This policy is reviewed annually by the Compliance Officer and approved by the Director. The next scheduled review date is June 2027. The policy will also be reviewed following any sexual harassment incident or investigation, any change in relevant legislation or EHRC guidance, any significant change in R&M's workforce composition or working arrangements, or upon feedback from employees, Client Organisations, or the Framework Manager.

R&M is committed to continuous improvement in its approach to preventing sexual harassment. This policy represents the current position and will evolve as best practice develops, as the EHRC publishes further guidance on the preventative duty, and as R&M learns from its own experience and from the wider construction industry.

Approved and Signed

Name: Thom McKenna

Position: Director, R&M Property Group Ltd

Date: 24 June 2026

This policy will be published on the R&M Property Group Ltd website and available to all employees, supply chain partners, and framework clients upon request.

Please print name, sign and date below your agreement to this policy -