



# Respect at Work Policy

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in progress

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## 1. Introduction

BSI strives to create a safe and supportive working environment free from bullying and harassment where all employees are treated, and treat others, with dignity and respect. We take a zero-tolerance approach to bullying and harassment (which includes victimisation, retaliation and other unacceptable behaviours as described in section 4 of this policy below).

This Respect at Work Policy ("Policy") covers bullying or harassment that occurs at work in other business-related settings, such as on work-related trips, events or social functions organised by or for BSI, whether on or off our premises. It applies where you have such concerns about the behaviour of employees and other persons working for on behalf of BSI in any capacity, including contractors, agency workers, seconded workers, volunteers, interns/ work experience students, agents, external consultants, suppliers, clients and associates of BSI (whether working on or off our premises). If you are in any doubt whether you are covered by this policy, please contact your local People Function Lead for guidance.

In order to take a consistent approach across BSI, this Respect at Work Policy will be used to resolve all matters covered by it unless it conflicts with the law of the country in which the matter has been raised (in which case, the relevant country law takes precedence).

## 2. Purpose

BSI is committed to providing an inclusive and supportive working environment. This includes providing an environment free from bullying and harassment (which includes victimisation, retaliation, and any other unacceptable behaviour).

This policy is designed to give guidance on the behaviours expected to ensure a working environment is established where everyone is treated, and treats others, with respect and dignity. It also provides information about the support available for dealing with unacceptable behaviour.

The aims of this policy are to:

- promote appropriate behaviour and to ensure respect and dignity at work for all;
- advise what types of behaviour are not acceptable;
- advise what support is available to those who feel bullied, harassed or are the subject of other unacceptable behaviour; and
- advise what steps employees can take if they feel they are not being treated with respect and dignity.



### **3. Scope**

This policy applies to all personnel within BSI. Aspects of this policy may need to be adapted to cater for those who are not employees. This policy applies both in the workplace and outside the workplace where there is a connection with work.

This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by BSI at any time.

### **4. Breach of this Policy**

In alignment with our Code of Business Ethics, breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported to Group Compliance at [compliance@bsigroup.com](mailto:compliance@bsigroup.com). BSI guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

BSI has partnered with Safecall to provide an independent externally hosted reporting line “SpeakUp” where you may raise your concerns relating to application or breaches of this policy anonymously. All reports are treated with the utmost confidentiality by independent staff. For further information on raising concerns and access to our Speak Up reporting line, please visit the page below:

<https://bsigroup.sharepoint.com/sites/complianceethics/SitePages/Speak-Up.aspx>

### **5. Unacceptable Behaviours**

Unacceptable behaviours (including but not limited to bullying, harassment, victimisation and retaliation – see below) may involve actions, words or physical gestures that could reasonably be perceived to be the cause of another person’s distress or discomfort. This may be between individuals or involve a group of people.

Unacceptable behaviour does not have to be face-to-face, and may take many forms such as written, telephone, video conferencing, email communications, or through social media. BSI expects everyone to be treated with respect and dignity by all those they encounter when working, including those they engage with externally.

Unacceptable behaviours can lead to difficult working environments, ill health and absence, poor morale, loss of respect, poor performance and resignation, as well as financial and reputational damage to BSI. Unacceptable behaviour will be treated as misconduct and in serious cases may be gross misconduct likely to result in dismissal. It may also be a criminal offence.

Unacceptable behaviour is characterised by behaviours that, in the recipient's opinion, are unwanted and unwelcome, and/ or which have the purpose or effect of violating a person's or group's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person or group of people.

Unacceptable behaviour can take a number of forms. Examples include the following:

### **5.1 Harassment**

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, as can many sporadic incidents, or ongoing behaviour. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Harassment related to characteristics protected by law can constitute unlawful discrimination. Examples of such characteristics, depending on the country in which the harassment takes place, include age, disability, gender identity or expression, gender reassignment, marital or civil partner status, pregnancy or maternity, race, national or ethnic origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Examples of what constitutes harassment and sexual harassment are set out below. These examples do not constitute an exhaustive list. Harassment may include, for example:

- using humour that ridicules another person or group of people, for example telling jokes that are related to the perceived effects of age or that are sexist, racist or about religion;
- mimicking or belittling an individual, for example because of a disability;
- sending offensive text messages;
- verbal abuse such as threats, insults or derogatory nicknames;
- displaying or circulating abusive or offensive materials, including on noticeboards, whiteboards, in emails, on internet bulletin boards and on social media; and
- sexual harassment (see section 4.2 below).

A person may be harassed even if they were not the intended 'target'. For example, a person may be harassed by racist jokes about a different group if the jokes create an offensive environment.

## 5.2 Sexual Harassment

Sexual harassment is defined as behaviour characterised by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation. Unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material.

Sexual harassment may include, for example:

- unwelcome sexual comments, jokes or pranks;
- unwanted physical contact such as touching, groping, patting, pinching, pushing, grabbing and brushing against another individual's body;
- non-verbal behaviour such as staring, leering, or gestures;
- unwelcome sexual advances or suggestive behaviour (including which the harasser may perceive as harmless);
- displaying sexually suggestive or pornographic objects, correspondence or pictures;
- persistent pressure to meet socially;
- threats or demands that a person submit to sexual requests as a condition of continued employment or to avoid some other loss;
- offers of employment-related benefits in return for sexual favours.

## 5.3 Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour (whether verbal, physical, psychological or otherwise) from one or more persons towards another or others, which makes the recipient(s) feel upset, threatened, humiliated, undermined, threatened or vulnerable, or otherwise undermines their right to respect and dignity at work. It can be repeated or persistent in nature, or could be a serious, one off incident of inappropriate behaviour.

Sometimes bullying can involve an abuse or misuse of power. 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.

Examples of what constitutes bullying and cyber bullying are set out below. These examples do not constitute an exhaustive list. Bullying may include, for example:

- shouting at, being sarcastic towards, ridiculing or demeaning others;
- making physical or psychological threats;
- overbearing or intimidating levels of supervision;
- making inappropriate and/or derogatory remarks about someone's performance;
- ridiculing or humiliating an individual, whether alone or in front of others;
- picking on someone where there is a common problem or setting them up to fail;

- making threats or comments about someone's job security without good reason;
- isolation or deliberate exclusion in the workplace or from work-related social events;
- abuse of authority or power by those in positions of seniority;
- cyber bullying (see section 4.4 below).

### **5.4 Cyber Bullying**

Cyber bullying is the use of information and communications technology to support bullying. It involves deliberate and hostile attempts to hurt, upset or embarrass another person. Non exhaustive examples of cyber bullying include:

- offensive emails;
- email threats, including emails that appear to be inoffensive, but the implied meaning behind it constitutes bullying. For example, a manager using email to bombard an employee with more work than is reasonable to expect them to handle, and not treating other employees in the same way;
- posting defamatory gossip on blogs and social networking sites. It is possible that a person does not immediately experience the bullying directly because they are unaware of what is being posted about them, but this is still cyber bullying;
- threats or offensive comments by text messages on mobile phones, web-based messenger platforms such as WhatsApp, Skype and Microsoft Teams;
- posting private and personal details about someone online or on social media platforms.

More information about appropriate and inappropriate use of information and communications technology can be found in BSI's Social Media Policy and Use of IT at BSI Policy.

### **5.5 Victimisation and Retaliation**

Victimisation and retaliation are other forms of bullying and harassment, to which BSI takes a zero tolerance approach. In many jurisdictions, victimisation and/or retaliation are also unlawful.

Victimisation occurs when a person is mistreated or suffers a detriment because they have made, intend to make, or have supported a complaint of discrimination or harassment, or have helped another person to make a complaint.

Similarly, retaliation is when someone treats another person less favourably for:

- reporting what they believe in good faith to be harassment and/or a violation of this policy;
- expressing an intent to report what they believe in good faith to be harassment and/ or a violation of this policy;
- assisting another member of Personnel in an effort to report harassment and/ or a violation of this policy; or
- participating in any investigation under this policy.

## 5.6 Other Unacceptable Behaviours

Other conduct, which ridicules, threatens, intimidates or is physically or physiologically abusive to an individual or group but not listed above is covered under this policy. as it can also amount to bullying or harassment. If Personnel are found to be mistreating their colleagues, BSI will take prompt and appropriate action to stop the behaviour.

If a complaint brought under this policy is judged to be vexatious or malicious, disciplinary action may be taken against the complainant. However, disciplinary action will not be taken if a complaint made in good faith is judged to be unfounded.

## 5.7 What does not constitute unacceptable behaviour?

For the avoidance of doubt and for the purposes of this policy, invoking BSI procedures connected to areas such as conduct, capability or discipline where such procedures are applied reasonably and appropriately will not constitute unacceptable behaviour. For example, legitimate, reasonable and constructive criticism of someone's performance or behaviour, or reasonable instructions given to a member of Personnel in the course of their employment or engagement by BSI, will not amount to bullying on their own.

# 6. Duties, Roles and Responsibilities

## 6.1 All Personnel

All Personnel are responsible for their own standards of behaviour and for ensuring their conduct is in line with the standards set out in this policy, and with values stated within BSI's Code of Business Ethics. To foster a safe and supportive working environment across the business, you should therefore:

- set a positive example by treating others with dignity and respect;
- not accept behaviour that may be offensive to themselves or to others, and take positive action to make sure that you report it under the Group Grievance Procedure (whether formally or informally);
- be supportive of Personnel who may be subject to bullying, harassment (including victimisation, retaliation or any other unacceptable behaviour);
- be aware of this policy and comply with it;
- report incidents of bullying and harassment under the Group Grievance Procedure;
- if you are not the victim but see instances of bullying or harassment taking place, promptly raise this with your line manager or your local People Function Lead so that appropriate action can be taken and support provided to the victim

## 6.2 Senior Leaders and Managers

All managers have a responsibility to implement this policy and to bring it to the attention of Personnel in their business area, in order to establish and maintain a work environment which protects and promotes respect and dignity at work and is free from bullying and harassment.

As a senior leader or manager, you are expected to:

- set a positive example by treating others with respect, setting and role modelling standards of acceptable behaviour;
- protect the dignity of all Personnel and other persons;
- provide advice, information and support that protects the dignity of Personnel;
- promote a working environment where bullying and harassment (as defined in section 4 above) are never tolerated;
- tackle and, where possible, resolve incidents of bullying or harassment (as defined in section 4 above);
- treat each complaint seriously and sympathetically and with an open mind, and deal with it promptly and effectively;
- consult the People Team at any time for advice and support, and follow this policy in full;
- where included in your job roles, review all policies and procedures so that they are consistent with the principles of justice, fairness and respect for Personnel and BSI.

## 6.3 People Team

The People Team have a responsibility to ensure that this policy is followed and applied fairly and consistently. If you are a member of the People Team, your responsibilities in this respect include:

advising and providing support for Personnel involved in incidents of bullying or harassment (as defined in section 4 above);

advising and supporting leaders and managers in the application of this policy;

ensuring the effective implementation of this policy;

monitoring incidents of bullying and harassment (as defined in section 4 above) and initiating prompt and appropriate action when such instances come to your attention.

## 7. Seeking a Resolution

### 7.1 Use of the Grievance Procedure

We encourage you to raise any complaints of unacceptable behaviour with your line manager in the first instance. If you do not feel comfortable doing so, please raise them with your local People Function Lead.

All complaints under this policy will be managed under the Group Grievance Procedure, which provides both informal and formal methods of resolving complaints. We will also consider how best to manage the ongoing working relationship between you and the person concerned, whether or not your complaint is upheld. For example, it may be appropriate to arrange some form of mediation. Mediation is a completely voluntary and confidential form of alternative dispute resolution. It involves an independent, impartial person (often one who has been

trained as a mediator) helping two or more individuals or groups to reach a solution that is acceptable to everyone. If it is decided that mediation is appropriate and should be arranged, the arrangements will be explained to you at that stage.

## 7.2 SpeakUp

It is up to everyone to speak up against all unacceptable behaviours. Doing so can make it clear that it is not acceptable and will not be tolerated.

In the first instance, we want you to feel confident in raising any concerns or grievances with your line manager and/ or your local People Function Lead, but we realise that sometimes you may not feel comfortable doing this or wish to remain anonymous. BSI has partnered with Safecall to provide an independent, externally hosted reporting line known as “SpeakUp”, where you may raise your concerns anonymously and be assured that they will be fully addressed. All reports are treated with the utmost confidentiality by the Compliance & Ethics team, and anyone else involved in investigating any complaints made to SpeakUp. For further information on raising concerns and access to our SpeakUp reporting line, please visit the page below:

Speak up and report concerns here: [Report an Incident Safecall](#)

## 8. Protection and Support

Anyone who is concerned about bullying or harassment (as defined in section 4 above) can ask for support from their line manager or their local People Function Lead.

This support is available to any Personnel who are experiencing, have witnessed, or been accused of, any form of unacceptable behaviour, as documented through this policy.

Good working relationships are important in creating a culture of dignity and respect at work, and BSI is committed to encouraging good, honest, open communication at all levels.

## 9. Protecting Confidentiality

Allegations about bullying and harassment, victimisation/retaliation or any other unacceptable behaviour can evoke strong feelings and are always serious, which is why both BSI and the accuser(s) have an obligation to maintain confidentiality as far as possible. This applies at every stage, including the investigation and the result. If you make a complaint and fail to maintain proper confidentiality at any time during the process, or you are interviewed in connection with someone else’s complaint and likewise fail to maintain confidentiality, you will have breached this policy.



All Personnel to whom a complaint is made or who learn of a complaint as part of an investigation by BSI must do everything reasonably possible to keep the complaint confidential in order to preserve the integrity of the investigation while it is ongoing, to ensure fairness to all involved, and to protect the privacy of those who have brought complaints or who are accused of such misconduct.

Disclosure of information learned through the complaint process and the investigation will be limited to disclosures that are necessary for BSI to fulfil its obligations to investigate and take prompt action to end the unacceptable behaviour. Although we seek to protect confidentiality as far as possible, nothing in this Policy should be construed as a guarantee of absolute confidentiality nor is intended to curtail a member of Personnel's rights under the law to discuss work-related matters.

Information about a complaint by or about any Personnel will be kept on file, along with a record of the outcome and of any notes or other document compiled during the process. BSI treats personal data collected during this process in accordance with the Group Privacy Policy.

## 10. Review

This policy is reviewed at least annually or in the event of a significant change. Personnel will be notified of any changes to the policy via BSI's intranet.

## 11. Contact Information

Questions relating to the content and application of this policy should be addressed to your local People Function Lead.

## 12. Associated Documents

Reference Number	Document Name
1	<i>Code of Business Ethics</i>
2	<i>Equality and Diversity Policy</i>