1. Policy Statement and Commitment

Stephen George + Partners (SGP) is committed to providing a safe, professional and respectful working environment in which everyone is treated with dignity and respect.

SGP does not tolerate harassment, sexual harassment, bullying, intimidation or other unacceptable behaviour towards its employees, whether perpetrated by colleagues or by third parties.

SGP will take all reasonable steps to prevent harassment of its employees by third parties in the course of their employment. This includes identifying and assessing foreseeable risks, implementing appropriate preventative measures, communicating expected standards of behaviour and reviewing the effectiveness of the measures taken.

SGP will respond promptly, fairly and appropriately to any concerns or incidents brought to its attention. Commercial relationships, project pressures, seniority or the status of an individual will not justify or excuse harassment.

This policy sets out the standards of conduct expected of all third parties who engage with SGP and explains the action that may be taken where those standards are not met.

2. Scope and Application

This policy applies to all third parties who interact with SGP employees in connection with their work, including:

- Clients and their representatives.
- Contractors, subcontractors and site personnel.
- Consultants and other professional advisers.
- Suppliers and service providers.
- Visitors to SGP offices.
- Individuals attending meetings, conferences, networking events or work-related social functions.
- Other members of the public encountered during work-related activities.

The policy applies to conduct occurring in SGP offices, client premises, construction sites, project meetings, during business travel and at work-related events.

It also applies to communications by telephone, email, messaging platforms, video conferencing, social media and other digital channels where the interaction is connected with an employee's work.

All third parties are expected to comply with this policy when engaging with SGP or its employees.

3. What Constitutes Harassment?

Harassment under the Equality Act 2010 includes unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Relevant protected characteristics for the statutory harassment provisions include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

Sexual harassment includes unwanted conduct of a sexual nature that has the purpose or effect described above.

Examples of unacceptable conduct include, but are not limited to:

- Offensive or derogatory comments, jokes, gestures or language.
- Sexual comments, propositions, advances or unwanted attention.
- Unwelcome physical contact or invasion of personal space.
- Sexist, racist, homophobic or other discriminatory remarks.
- Displaying, sending or sharing offensive or sexually explicit material.
- Persistent inappropriate messages, telephone calls or online communications.
- Intimidating, threatening, humiliating or aggressive behaviour.
- Repeated personal remarks or questioning that cause discomfort.
- Retaliation against an individual who raises or supports a concern about harassment.

Harassment may occur as a single serious incident or through repeated behaviour. It may take place in person or electronically.

Conduct may be unacceptable even where the person responsible claims that no offence was intended.

SGP also prohibits bullying and other inappropriate conduct that may fall outside the statutory definition of harassment. This broader behavioural standard reflects SGP's commitment to a respectful professional environment.

4. SGP's Duty to Take All Reasonable Steps

From 30 October 2026, the Employment Rights Act 2025 introduces liability for harassment of employees by third parties where an employer has failed to take **all reasonable steps** to prevent that harassment.

SGP recognises that this requires proactive and continuing action, rather than relying solely on responding to complaints after incidents occur.

SGP will identify and implement all preventative measures that are reasonable in its circumstances, taking account of its activities, working environments, identified risks and available resources.

These measures will include, as appropriate:

Risk Assessment and Prevention

- Assessing risks of third-party harassment across offices, construction sites, client meetings, professional events, work-related travel and digital communications.
- Considering circumstances that may increase risk, including lone working, power imbalances, isolated locations and events involving alcohol.
- Implementing appropriate controls to eliminate or reduce identified risks.
- Reviewing risk assessments when working arrangements or circumstances change.

Communication and Contractual Standards

- Making third parties aware of SGP's expectations for respectful behaviour.
- Displaying appropriate notices in SGP offices and other relevant locations.
- Including suitable anti-harassment provisions in contractual terms and project documentation where appropriate.
- Communicating relevant requirements to clients, contractors, consultants, suppliers and visitors.

Employee Awareness and Support

- Providing employees with information and training on recognising, preventing and reporting third-party harassment.
- Providing additional guidance to those who manage client relationships, site activities or higher-risk situations.
- Ensuring employees know whom to contact and how to seek assistance.
- Supporting employees who experience or witness unacceptable behaviour.

Monitoring and Improvement

- Recording reported incidents, identified risks and actions taken, with appropriate safeguards for personal information.
- Reviewing incidents for patterns, recurring risks and opportunities for improvement.
- Reviewing the effectiveness of preventative measures and making changes where necessary.
- Documenting decisions about preventative measures, including the reasons why any proposed measure is not considered reasonable or appropriate.

The steps required may vary according to the nature and level of risk. SGP will not regard the existence of a written policy alone as sufficient evidence that it has taken all reasonable steps.

5. Standards Expected of Third Parties

All third parties engaging with SGP are expected to:

- Treat SGP employees with courtesy, dignity and professional respect.
- Refrain from harassment, sexual harassment, discrimination, bullying, intimidation and threatening behaviour.
- Respect professional boundaries and personal dignity.
- Ensure that their representatives and personnel are aware of the standards expected when interacting with SGP.
- Cooperate appropriately with any concerns or investigations relating to their conduct.
- Comply with reasonable instructions or measures introduced to protect SGP employees.

These expectations apply regardless of an individual's position, commercial influence, seniority or contractual relationship with SGP.

6. Reporting Concerns and Incidents

SGP encourages employees to report harassment, inappropriate behaviour or circumstances in which they feel at risk, including where an incident has not yet occurred.

Employees may raise concerns with their Team Leader, Director, Partner or Practice Director, as appropriate.

Where the usual reporting contact is involved in the concern, unavailable or otherwise unsuitable, employees may approach another appropriate senior member of the Practice.

Concerns may be raised verbally or in writing. Employees should provide as much relevant information as they reasonably can, including the nature of the incident, the individuals involved, when and where it occurred and any supporting evidence.

Employees are not required to confront the person responsible before reporting a concern.

Third parties who witness or become aware of unacceptable behaviour towards SGP employees are also encouraged to report it to their SGP contact or an appropriate senior representative of the Practice.

All reports will be taken seriously. Information will be handled sensitively and shared only with those who reasonably need it to assess the concern, protect those involved or take appropriate action. Absolute confidentiality cannot be guaranteed.

7. Responding to Reports of Harassment

SGP will assess reports promptly and take action appropriate to the circumstances.

Depending on the nature and seriousness of the concern, this may include:

- Taking immediate steps to protect the employee's safety and wellbeing.
- Arranging alternative contacts, meeting arrangements or working practices.
- Reviewing relevant correspondence, records or other evidence.
- Speaking with the employee, witnesses and the third party concerned.
- Raising the matter with the relevant client, contractor, consultant, supplier or other organisation.
- Requiring the behaviour to cease and seeking appropriate assurances.
- Restricting access to SGP premises, meetings or employees.
- Requesting the removal or replacement of an individual from a project or working arrangement.
- Suspending or ending an engagement or contractual relationship where appropriate and legally permissible.
- Referring a matter to the police or another relevant authority where warranted.

SGP will consider the wishes of the employee concerned, while recognising that it may need to take action to protect others or fulfil its legal obligations.

Employees will not ordinarily be expected to continue working directly with a person who presents an unresolved and significant risk of harassment without appropriate protective measures.

Where an incident identifies a wider or continuing risk, SGP will review and strengthen its preventative arrangements as necessary.

8. Protection Against Retaliation

SGP will not tolerate retaliation, victimisation or adverse treatment against any person who raises a concern in good faith, witnesses an incident or assists with an investigation.

Third parties must not threaten, intimidate, disadvantage or otherwise retaliate against an employee for reporting or challenging inappropriate behaviour.

Any indication of retaliation will be treated as a serious matter and may result in additional protective or contractual action.

9. Responsibilities

Partners and Directors

Partners and Directors are responsible for:

- Demonstrating a clear commitment to preventing third-party harassment.
- Ensuring that all reasonable preventative steps are identified, implemented and reviewed.
- Considering harassment risks when planning projects, meetings, site visits and other activities.
- Taking concerns seriously and ensuring appropriate action is taken.
- Supporting employees and addressing recurring or systemic risks.
- Reviewing the effectiveness of this policy and associated preventative measures.

Team Leaders and Employees with Management Responsibilities

Team Leaders and employees with management responsibilities are expected to:

- Promote and reinforce appropriate standards of conduct.
- Remain alert to risks in the working environments they oversee.
- Respond appropriately to concerns and escalate them without unnecessary delay.
- Support the implementation of relevant risk controls.

All Employees

All employees are encouraged to:

- Treat others with dignity and respect.
- Familiarise themselves with the reporting arrangements.
- Report incidents, concerning behaviour and identified risks.
- Cooperate with reasonable preventative and investigative measures.

Third Parties

Third parties are responsible for complying with the standards set out in this policy and cooperating with reasonable measures taken by SGP to protect its employees.

10. Application of This Policy

This policy sets out the standards of behaviour expected of all third parties engaging with Stephen George + Partners (SGP) and explains SGP's commitment to preventing harassment of its employees.

All third parties are expected to familiarise themselves with and comply with this policy when interacting with SGP employees in connection with their work.

SGP may communicate additional requirements or introduce specific preventative measures where necessary to address risks associated with particular projects, premises, activities or working arrangements.

Nothing in this policy limits SGP's statutory obligations or the rights and protections available to its employees under applicable legislation.

11. Monitoring, Review and Continuous Improvement

SGP will review this policy at least annually and sooner where necessary following:

- A significant incident or complaint.
- Changes in legislation or official guidance.
- The identification of new or increased risks.
- Material changes to working arrangements, project activities or third-party interactions.
- Feedback from employees or evidence that existing preventative measures are ineffective.

SGP will retain appropriate records of risk assessments, preventative actions, relevant training, reported incidents and policy reviews to support ongoing improvement and demonstrate the steps taken.

The Practice will continue to identify and implement **all reasonable steps** necessary to prevent third-party harassment in its working environments.

Signed:



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Partner
11 November 2026