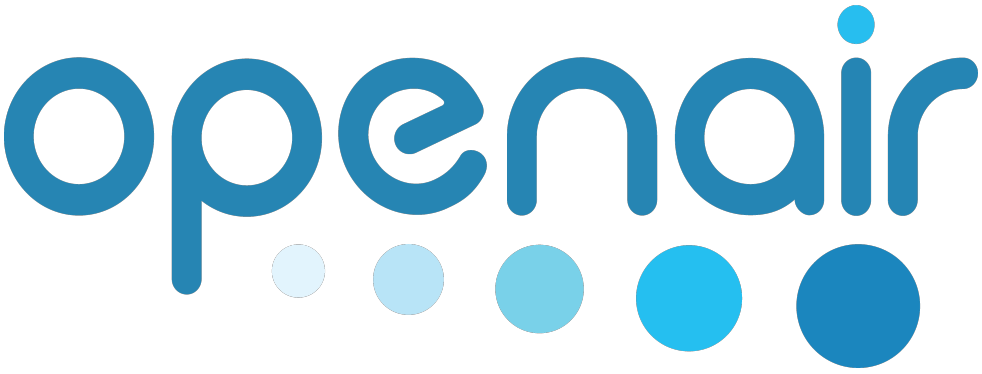


Anti-Harassment and Bullying Policy

Company Name: OpenAIR Systems Ltd
Effective Date: Sept 2026

Next review Date: Sept 2027

1. Purpose and Scope

OpenAIR Systems Ltd is committed to providing a safe, respectful, and inclusive working environment free from harassment, sexual harassment, and bullying.

This policy applies to all employees, workers, agency staff, contractors, consultants, and interns ("Staff"). It covers conduct:

- In the workplace, at client or third-party sites, and during remote or hybrid working.
- At work-related social events, conferences, training, and business travel.
- Via all forms of communication, including email, messaging apps, phone calls, and social media.
- Involving **third parties** (such as clients, customers, suppliers, visitors, and members of the public).

2. Legal Framework

We maintain a zero-tolerance approach to unlawful harassment and bullying in accordance with the **Equality Act 2010** and the **Employment Rights Act 2025**. Under UK law, we take **all reasonable steps** to prevent harassment of our Staff—both by colleagues and by third parties—and require our Staff to uphold these same standards when interacting with external personnel.

3. Definitions

- **Harassment:** Unwanted conduct related to a relevant **protected characteristic** (age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation) that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- **Sexual Harassment:** Unwanted conduct of a sexual nature (verbal, non-verbal, or physical) that violates a person's dignity or creates an offensive environment, or treating someone less favourably because they submitted to or rejected sexual conduct.
- **Third-Party Harassment:** Harassment or sexual harassment directed at our Staff by someone outside the company (such as a client's employee, customer, or supplier), or committed by our Staff against a third party.
- **Bullying:** Offensive, intimidating, malicious, or insulting behaviour, or an abuse of power, that undermines, humiliates, or injures the recipient.

4. Preventative Measures and Responsibilities

To meet our duty to take all reasonable steps to prevent harassment:

- **Management:** Managers must model respectful behaviour, conduct risk assessments for client-site or public-facing roles, and act immediately upon witnessing or receiving reports of misconduct.
- **All Staff:** Everyone must treat colleagues and third parties with dignity, intervene safely or report concerns if they witness inappropriate behaviour, and complete mandatory annual anti-harassment training.
- **Client Sites & External Projects:** Before deploying Staff to external sites, OpenAIR Systems Ltd will confirm mutual safety standards with the client. If a Staff member experiences harassment from a client or third party, we will take immediate protective action, which may include removing the Staff member from the site without penalty and escalating the matter to the client's senior management.
-

5. Reporting and Escalation Procedure

Anyone who experiences or witnesses bullying or harassment is encouraged to report it promptly:

1. **Internal Reporting:** Staff can raise concerns informally or formally with their line manager, or directly with Directors of the company. If the concern involves your line manager, report it directly to a Director or Senior Manager.
2. **External / Third-Party Complaints:** Clients, suppliers, or visitors wishing to report conduct involving our Staff can contact compliance@openair.systems directly.
3. **Confidentiality:** All reports will be handled sensitively, confidentially, and without fear of retaliation or victimisation.

6. Investigation and Disciplinary Action

- **Prompt Action:** All formal complaints will be acknowledged within 2 working days and investigated fairly and objectively by an impartial person.
- **Joint Investigations:** Where an incident involves a client or third party, we will cooperate fully with the client's investigation procedures while conducting our own internal review.
- **Consequences:** Proven acts of harassment or bullying by Staff will be treated as misconduct—or gross misconduct in serious cases—under our Disciplinary Procedure, which may result in termination of employment or contract.