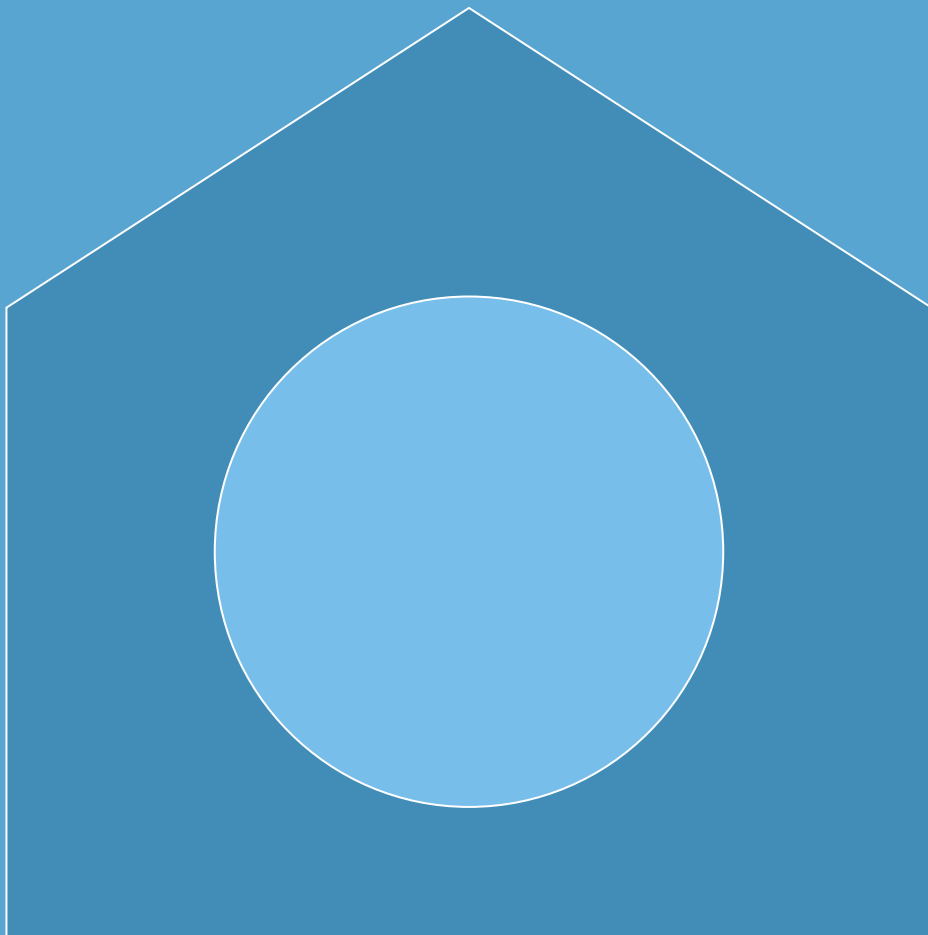


Cairn Homes plc
Dignity at Work Policy



Bullying and harassment has a detrimental effect on the health, confidence, morale, and performance of those subjected to it. Bullying and harassment may also have a damaging impact on employees who are not directly subjected to the inappropriate behaviour, but who witness it or have knowledge of it.

Our Approach

Consequently, Cairn Homes is committed to providing a working environment free from all forms of bullying, including cyber bullying, harassment, and sexual harassment, and ensuring all employees are treated with dignity and respect. This means that intimidating behaviour of any kind will not be tolerated by Cairn Homes. This policy extends to bullying, harassment and sexual harassment by employees of Cairn Homes plc and its subsidiaries "Cairn Homes" or the "Group", clients, customers, consultants, contractors, and other business contacts:

- At the workplace;
- Outside of the workplace during employment, such as on business trips, at conferences, work-related events, or social functions;
- Includes different treatment of an employee because they have rejected or accepted the bullying, harassment, or sexual harassment.

What is Bullying and Harassment?

Workplace bullying

Workplace bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could be reasonably regarded as undermining the individual's right to dignity and respect at work. An isolated incident of the behaviour described in this definition may be an affront to dignity at work, but, as a once off incident, is not considered to be bullying.

Bullying

Bullying is more than a single occasion and can include conduct offensive to a reasonable person, for example oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti, or other material that state/imply prejudicial attitudes that are offensive to fellow employees.

Other examples of bullying include (but are not necessarily limited to):

- Personal insults and name-calling
- Persistent unjustified criticism and sarcasm;
- Shouting at staff in public and/or private.
- Sneering;
- Unfair delegation of duties and responsibilities;
- Setting impossible deadlines;
- Unnecessary work interference;
- Aggression;
- Not giving credit for work contribution;
- Continuously refusing reasonable requests without good reasons;
- Intimidation and threats in general.

Bullying does not always include:

- Expressing differences of opinion strongly;

- Offering constructive feedback, guidance, or advice about work related behaviour which is not of itself welcome;
- Ordinary performance management;
- Reasonable corrective action taken by an employer or supervisor relating to the management and direction of employees (for example managing an employee's performance, taking reasonable disciplinary actions, or assigning work); or
- Workplace conflict where people disagree or disregard the others' point of view.

Cyberbullying or cyber-harassment

Cyberbullying or cyber-harassment is a form of bullying or harassment using electronic means, such as computers, tablets, mobile phones etc. Cyberbullying can occur through SMS, Text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour. Cyberbullying will be treated with the same seriousness as any other form of bullying and will be dealt with in accordance with this policy.

The most common places where cyberbullying occurs are:

- Social media, such as Facebook, Instagram, Snapchat, and Tik Tok;
- Text messaging and messaging apps on mobile or tablet devices;
- Instant messaging, direct messaging, and online chatting over the internet;
- Online forums, chat rooms, and message boards;
- Email; or
- Online gaming communities.

These examples are not exhaustive, and offences of a similar nature are also prohibited and will be dealt with appropriately.

Harassment

Harassment is any unwanted conduct related to gender, civil status, family status, sexual orientation, religious belief, age, disability, race, or membership of the traveller community and which creates an intimidating, hostile, degrading, humiliating or offensive environment for the person. The unwanted conduct may consist of acts, requests, spoken words, gestures, or the production, display or circulation of written words, pictures, or other material. A single incident may constitute harassment.

Harassment can also constitute as unwanted conduct based on the discriminatory ground, even if the person does not have that relevant characteristic, for example, if the perpetrator believes that the employee has the characteristic, but the employee doesn't. The intention of the alleged harasser is irrelevant - it is the effect of the behaviour on the recipient which is relevant.

Sexual harassment

Sexual harassment is any form of verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. This includes same-sex sexual harassment. The unwanted conduct may consist of acts, requests, spoken words, gestures, or the production, display or circulation of written words, pictures, or other material.

Examples of sexual harassment include:

- Sexual gestures;
- Displaying sexually suggestive objectives, pictures, calendars;
- Sending suggestive and pornographic correspondence, including e-mails or text messages;
- Unwelcome sexual comments and jokes; or

- Unwelcome physical conduct, such as pinching, unnecessary touching, etc.

These examples are not exhaustive, and offences of a similar nature are also prohibited and will be dealt with appropriately.

Role Responsibilities

Employees

Employees have a role in promoting an organisational culture that is free from any form of bullying and harassment. All employees have a responsibility to behave with dignity and respect towards one another in the workplace. This applies both in individual interactions and interactions in a group with other employees, contractors, customers, clients, and anyone in the workplace.

Managers

Managers play a pivotal role in creating a positive workplace culture. Managers must promote awareness of Cairn Homes' policies and procedures. Should any matter of bullying, sexual harassment or harassment be brought to a manager's attention, managers should ensure that it is dealt with in a sensitive manner and in accordance with this policy. Managers will provide training to ensure that everyone is treated with respect and dignity at all times at work.

Senior talent partner

The senior talent partner is available to provide any information to anyone who may have a query in relation to the operation of this policy or if an employee requires support or guidance in relation to a matter where they would welcome some information or assistance. Should an employee initiate a complaint under this policy, the Senior Talent Partner will not be involved in any investigation that may be conducted.

Complaints

If an employee raises a complaint under the complaint's procedure outlined below the individual regarding whom the allegation is made will be referred to as the respondent.

Complaints by employees will be treated with fairness and sensitivity and in as confidential a manner as possible.

Respondents who are Cairn Homes' employees, and who are found to have breached this policy, will be subject to the Cairn's Disciplinary procedure and may be subject to criminal investigation.

Employees who make a complaint in good faith or who participate in any investigation process will not be victimised. Those who make false allegations of bullying, harassment and sexual harassment may be subject to disciplinary action.

Informal Complaints Procedure

Initial informal procedure

As a first step, employees should, wherever appropriate, attempt to address an allegation of bullying, harassment, or sexual harassment as informally as possible by means of this initial informal procedure.

The informal procedure is most suitable for non-serious complaints, such as in scenarios where it is likely the respondent is not even aware of that their behaviour is negatively impacting others. It is an informal mechanism designed to be flexible to allow for minor complaints to be quickly dealt with.

1. The employee who believes they are being bullied, harassed, or sexually harassed should explain clearly to the respondent that the behaviour in question is unacceptable.
2. If it is more suitable, the complainant should put their concerns in writing.

3. In circumstances where the complainant finds it difficult to approach the respondent(s) directly, they should seek assistance from the people partner or a manager where appropriate.
4. The complainant may wish to avail of the Senior Talent Partner for confidential support or information.
5. A brief written record should be kept of the matter and agreed outcomes and dates noted by the relevant person responsible for managing the complaint.

Secondary informal procedure

This procedure may be used if the Initial Informal Procedure is unsuccessful or unsuitable for the nature or seriousness of the issue. Whilst this process is more detailed than the initial informal procedure it is still informal.

A separate designated person with the appropriate training will be assigned to handle the complaint on behalf of Cairn Homes (the Nominated Person). The Nominated Person will not be the Senior Talent Person.

1. The employee should submit their complaint in writing, but where this does not occur, the Nominated Person handling the complaint will write up the complaint and provide the employee with a copy.
2. The Nominated Person will attempt to establish the facts and context of the complaint before deciding on the next actions to be taken.
3. If after the Nominated Person has established the facts, they believe the respondent has a case to answer, they will put the allegations to them and provide them with an opportunity to respond. The Nominated Person must organise a meeting with the respondent to record their response.
4. A method should be agreed to progress the issue to resolution so both parties can return to a harmonious working environment whilst the process continues.
5. If it is found there has been inappropriate behaviour from the respondent, steps should be put in place to stop the behaviour and to monitor it going forward to prevent a recurrence. This should include the drawing up of a plan with agreed actions which is to be signed by both parties at a final meeting.
6. The Nominated Person handling the case should keep a nominal record of all stages.

Formal Procedure

If an informal approach is inappropriate or if after the informal procedures, the conduct complained of persists, after already informing the respondent, the following formal procedures should be followed.

An employee may also choose to bypass both the initial and secondary informal procedures. Choosing not to use the informal procedures should not reflect negativity on an employee in the formal procedure. However, on an initial examination under the Formal Procedure, management may direct that an attempt may be made to resolve the matter under either the Initial or Secondary Informal Procedure.

Written complaint

The complainant should make a formal complaint in writing to his/her immediate manager, or if preferred, a member of the People Team. The complaint should be confined to precise details of the allegation(s). The manager must immediately inform a member of the People Team.

Rights of the respondent

The respondent(s) will be notified in writing that an allegation of bullying, harassment or sexual harassment has been made against them. They will be given a copy of the employee's statement and advised that they will be afforded a fair opportunity to respond to the allegation(s).

Initial examination

The complaint will be subject to an initial examination by a designated member of management, who can be considered impartial, with a view to determining an appropriate course of action. An appropriate course of action at this stage, for example, could be exploring a mediated solution or seeking to resolve the issue informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of the complaint will take place with a view to determining the facts and the credibility or otherwise of the allegation(s) and, in appropriate cases, the referral of the matter for further consideration in the context of a disciplinary hearing.

Terms of reference

The investigation should be governed by terms of reference, determined by management following consultation with the employee making the complaint and the respondent(s).

Investigation

1. Both the employee making the complaint and the respondent will be informed in writing of the following:
 - What the formal procedure entails and the indicative time limits;
 - That both parties have the right to be accompanied and/or supported, by a colleague;
 - That the complaint will be in writing and that the respondent will be given details in writing of the nature of the complaint, including written statements and any other documentation or evidence including interview notes or records of meetings held with the witnesses;
 - That the respondent will be given time to consider the documentation and an opportunity to respond to such documents;
 - That confidentiality will be maintained throughout any investigation to the greatest extent possible, consistent with the requirements of a fair investigation;
 - That a written record will be kept of all meetings and investigations;
 - That the investigation having considered all of the evidence before it and the representations made to it will produce a written report to both parties outlining its findings and the reasons for its final decision;
 - If the complaint is upheld against a respondent who is not an employee of the organisation, the report will recommend appropriate next steps which could include:
 - Exclusion of the individual from premises;
 - Suspension or termination of service;
 - Suspension or termination of a supply service or other contract.
2. The investigation will be conducted at the discretion of the Chief People Officer by either a designated member or members of management or, if deemed appropriate, one or more third parties.
3. The investigation will be conducted thoroughly, objectively, with sensitivity, utmost confidentiality, and with due respect for the rights of both the complainant and the respondent(s).
4. The investigator(s) will meet with the employee making the complaint and the respondent(s) and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts surrounding the allegations(s). Both the employee making the complaint and respondent(s) may be accompanied by work colleague.
5. Every effort will be made to carry out and complete the investigation as quickly as possible and preferably within an agreed timeframe. On completion of the investigation, the investigator(s) will submit a written report to management containing the findings of the investigation.
6. Both parties should be given the opportunity to comment on the findings before any action is decided upon by management.

Outcome

The employee making the complaint and the respondent(s) will be informed in writing of the findings of the investigation. Should the investigator decide the complaint is well founded, the matter may be referred to a

disciplinary hearing for further consideration. Alternatively, the investigator may find that other actions such as counselling, mediation or training would be appropriate. Should the investigator find that the complaint is not well founded they should communicate this outcome to the parties.

Any individual found to have made a false allegation of bullying, harassment or sexual harassment, or any individual who supports a false claim (e.g., witnesses), may be subject to disciplinary action up to and including dismissal.

Appeal

If either party is not satisfied with the outcome of an investigation, they may appeal in writing to the Chief People Officer stating the full grounds of appeal within five working days of the date on which the decision was sent or provided to them. The appeal will be dealt with impartially by a member of the Cairn Homes Leadership Team who has not previously been involved in the case. Any appeal will focus on the conduct of the investigation in terms of fair process and adherence to procedure. It is not a re-hearing of the original issues.

Confidentiality

All individuals involved in the procedures referred to above must follow the Cairn's Confidential Reporting Policy. Any breaches of confidentiality will be dealt with in accordance with Cairn Homes' disciplinary procedure.

Malicious complaints

If a complaint is found to be malicious, then appropriate disciplinary action up to and including dismissal may be imposed, after due process.

A malicious complaint can be described as an allegation being made without foundation, and with malicious intent, where a person knowingly or without regard to whether it is true or not, accuses another person of allegedly bullying them. This could also apply to where one person maliciously complains of someone allegedly bullying a third party, without fully exploring the veracity of the claim.

Victimisation

Employees will not be penalised, treated less favourably or subject to other adverse treatment because of pursuing rights by way of taking action, supporting action or giving notice of intention to take or support action under this policy or under equality legislation.