

Harassment Policy

Contents

1. Purpose
2. Scope
3. Policy Statement
4. Definitions of Unacceptable Behaviour
5. Procedure

Purpose

To create an environment in which everyone can work without being harassed, victimised or bullying on the grounds of race, colour, nationality, ethnic origin, religion or belief, disability, sexual orientation, marital status, gender, gender reassignment, age, pregnancy or maternity, or any other characteristic protected by law.

This policy should be read in conjunction with the company's general policy on Equal Opportunities.

Scope

All employees, job applicants, agency staff, contractors and consultants (referred to as "Workers" in this policy). Save as implied by law, however, this policy does not form part of any contract of employment with the company and may be amended by the company from time to time.

Policy Statement

CPCL considers harassment to be harmful to workers, employers and customers alike. It can subject individuals to fear, stress and anxiety within the workplace and in their personal and family life. Harassment can lead to illness, accidents, absenteeism, poor work performance and an apparent lack of commitment as well as people leaving employment. It may therefore impact adversely on safety, organisational effectiveness and business success.

This policy aims to ensure the fair treatment and dignity of women and men at work and prohibits all forms of harassment.

This policy is not designed to discourage normal social relations among colleagues or with the public. Its aim is to prevent unlawful discrimination. It applies not only to interaction whilst working at the company's offices but extends to time spent travelling on business, on training courses, conferences and social events with colleagues.

This policy further recognises that those who are harassed, victimised or bullied often feel vulnerable and may be reluctant to complain. It therefore aims to accommodate any such concerns or difficulties.

Definitions of Unacceptable Behaviour

The following types of behaviour are examples of unacceptable conduct. Please note, however, that this list is not exhaustive.

HARASSMENT consists of any unwanted conduct affecting the dignity of people at work. It includes unwelcome verbal or physical conduct which another worker may find intimidating, offensive or distressing. It can amount to unlawful discrimination. It may involve a single incident or may be persistent and may be directed towards one or more individuals. All harassment is prohibited for the purposes of this policy, including but not limited to harassment on the basis of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation, as covered in the Equality Act 2010.

UNWANTED PHYSICAL CONTACT such as unnecessary touching, insulting or abusive behaviour or gestures, physical threats or assault.

UNWANTED VERBAL CONDUCT such as comments concerning an individual or a group's race, colour, sexual orientation, nationality, ethnic origin, religion, disability, age, gender, marital status and comments which are intended to demean or humiliate a person for any other reason, such as unwelcome advances, patronising titles or nicknames, propositions or remarks, innuendo, lewd comments, inappropriate jokes or banter, abusive language or repeated suggestions for unwanted social activities.

UNWANTED NON-VERBAL CONDUCT such as religious, racial or sexually based graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, the display of

pornographic or suggestive literature or other items, pictures or films/videos, inappropriate use of visual display units (VDUs) or network systems or sending of e-mails for this purpose.

BULLYING, including persistent unjustified criticism and personal abuse and/or ridicule and inappropriate use of status, authority or position, either in public or private, which humiliates or demeans the individuals involved, gradually eroding their self-confidence.

UNLAWFUL VICTIMISATION consists of treating an individual less favourably than others are or would be treated in the same or similar circumstances, because they have made a complaint or allegation of discrimination or have acted as a witness or informant in connection with proceedings under the Equality Act.

OTHER CONDUCT, which denigrates, ridicules, intimidates or is physically abusive of an individual or group.

These examples are not exhaustive. However, none of the above types of behaviour will be tolerated. It is irrelevant if the offending person does not mean to give offence or believes their comments or conduct to be welcome. It is for the recipient of such conduct to determine what behaviour they find acceptable and what they regard as offensive. Any alleged breach of this policy will result in a disciplinary investigation and may constitute gross misconduct, leading to summary dismissal.

Conduct of this nature can amount to harassment even though it is not explicitly about an individual's colour, race, nationality, ethnic or national origin, gender, sexual orientation, marital status, age, disability or religion, where the conduct is directed at them or singles them out for one of those reasons.

Managerial Duties

It is the responsibility of all line managers/supervisors to implement this policy and to take corrective action to ensure compliance with it.

A manager or supervisor who becomes aware of behaviour which may breach this policy, whether or not a complaint has been made, has a responsibility to take the matter forward. They must discuss the issues with the alleged victim of the harassment and/or, where appropriate, the alleged perpetrator. Unless the individual expressly requests otherwise the incident/concern should be reported to a member of the People and Organisation Department.

It may be necessary in serious cases (for example, where it is felt that others could be at risk if no action is taken) for the allegations to be investigated and disciplinary action taken even if a formal written complaint is not made.

Every employee, manager and supervisor who observes any harassment has an obligation to speak to the harasser to advise against any such behaviour. Anyone who feels unable to do so should raise their concerns with their line manager and/or a member of the People and Organisation Department.

Procedure

Any individual who believes that they have been subject to, or have witnessed harassment, victimisation or bullying, has access to channels through which complaints can be raised.

The nature of harassment, victimisation or bullying is such that it is recognised that an individual may not wish to discuss it initially with their immediate manager or supervisor, particularly if the immediate manager or supervisor is the source of the problem. A Harassment, Bullying and Victimisation Complaints Procedure (the "Harassment Complaints Procedure") has therefore been established.

Reference to and application of the Harassment Complaints Procedure removes neither the individual's nor the employer's legal or contractual rights, responsibilities, obligations or remedies.

All complaints must be taken seriously and dealt with confidentially and promptly, although they may take longer where, for example, additional time is needed to carry out a proper investigation of the facts.

If a complaint is upheld, the resolution of the situation will be aimed, amongst other things, at preventing any repetition of the behaviour or any associated behaviour.

Employees are assured that they will be protected against any victimisation for bringing a complaint. Any person who is found to have victimised or retaliated against another for complaining, supporting an employee

or giving evidence about harassment will be subject to disciplinary action, and, if sufficiently serious, may be summarily dismissed as a result of their actions.

Employee Responsibility and Complaints Procedure

It is the responsibility of all employees to comply with this policy and to treat all others with respect and dignity. Every employee must take reasonable steps to ensure that harassment does not occur and must report any incidents to their line manager and/or the People and Organisation Department.

Informal Action

Any individual who feels that they or others have been harassed, victimised, bullied or treated in a way that breaches this policy should, if they feel able to do so, immediately tell the individual(s) doing it that the behaviour in question is offensive, unwanted, and that it should stop.

A note should be kept of the date(s) and what was said by all involved. This may be needed as evidence should a further complaint of harassment, victimisation or bullying be made.

This is often sufficient to correct the situation, particularly if the individual(s) involved was/were unaware that the behaviour was causing offence.

An individual who feels unable to do this or who continues to be subjected to behaviour which they believe is in breach of this policy should raise the matter, either verbally or in writing, with their line manager or a member of the People and Organisation Department. Following initial discussions, the complainant will be asked to choose one of the following options:

1. decide that no further action is necessary;
2. discuss the complaint with the alleged perpetrator (in the presence of the complainant's line manager or a representative from People and Organisation if the complainant wishes);
3. request that the complainant's line manager or a member of the People and Organisation Department help to resolve the matter through informal and discreet approaches to the individual; or
4. make a formal complaint using the procedure outlined below.

Formal Action

At any time, whether or not informal action has been taken, any individual who feels that they or others have been harassed, victimised, bullied or treated in a way that breaches this policy can make a formal written complaint to their manager or the People and Organisation Department. Any such complaint must specify:

- the name of the alleged perpetrator;
- the date of any incident(s);
- the nature of the conduct complained of; and
- the name of any persons present who may have witnessed the incident(s).

All complaints will be handled in a timely, confidential, impartial and sensitive manner. The allegations will be fully investigated, with the complainant, the alleged perpetrator and any potential witnesses being separately interviewed by a designated member of the People and Organisation Department (although the company reserves the right to substitute another interviewer where it considers it appropriate to do so). The alleged perpetrator will be given full details of the complaint against them in writing before any investigatory interview. All involved will be entitled to be accompanied to any investigatory interviews by a fellow colleague.

Where possible, action will be taken to minimise contact between the complainant and the alleged perpetrator while the investigation is carried out. In serious cases the alleged perpetrator may be suspended on full pay pending conclusion of the investigation.

If the investigation reveals the complaint to be valid, prompt action designed to stop the harassment and to prevent its recurrence will be taken and the company's disciplinary policy will be used as appropriate.

Employees against whom a complaint has been made will have the opportunity to put forward their side of the story and are assured of a fair and impartial hearing. In serious or persistent cases of harassment, dismissal may result. Other cases may warrant a warning. In some situations, it may be appropriate to relocate or transfer one of the parties concerned. In the case of a complaint being upheld under this policy every effort will be made to relocate the harasser and not the victim. In accordance with the company's disciplinary policy, the harasser will have the right of appeal against any disciplinary action taken against them as a result of a complaint under this policy.

CPCL will keep the complainant and alleged perpetrator informed of developments and expected timetables in relation to its investigation into the complaint(s) made.

At the conclusion of the investigation and any subsequent disciplinary action the complainant shall be advised, in writing, of the outcome of such actions. The alleged perpetrator shall also be kept informed of progress as it relates to them.

Appeal

If, having made a formal complaint under this policy, the complainant believes the outcome is either wrong or unjust, they may appeal, in writing, to a director of their division, or the VP, People and Organisation, within fourteen days of being informed of the outcome of the investigation.

Following a review of the matter a further hearing will be held, typically within seven days of the appeal being registered. The appeal hearing will typically be heard by a senior manager and a member of the People and Organisation Department, where possible.

The complainant will be entitled to be accompanied to any such appeal hearing by a work colleague.

The complainant will be notified in writing of the decision, which will be final.

Counselling Services

CPCL offers access to a confidential counselling service through the Employee Assistance Programme (EAP) which is available to those involved in or affected by any complaint made under this policy. See page 9 for further detail on how to access the programme.

Confidentiality

All complaints and associated correspondence and interviews will be treated in strict confidence as far as possible. Unwarranted disclosure of confidential information may result in disciplinary action being taken.

Responsibility

All employees, and in particular managers and supervisors, must ensure that this policy is adhered to at all times. Disciplinary action will be taken against employees who act in breach of this policy and may result in summary dismissal in the case of a serious breach of it. Disciplinary action will also be taken against any employee found to have made malicious or vexatious allegations of harassment.

The People and Organisation Department is responsible for ensuring the maintenance and regular review and updating of this policy. Revisions, amendments or alterations to this policy can only be implemented following consideration and approval by the People and Organisation Department.

Disciplinary Policy

Contents

1. Purpose
2. Scope
3. Policy Statement
4. Misconduct
5. Informal Disciplinary Procedure and Counselling
6. Formal Disciplinary Procedure
7. Appeal
8. Suspension
9. Other Penalties
10. Gross Misconduct

Purpose

To establish a clear procedure which will ensure the fair and consistent treatment of employees when disciplinary action becomes necessary. The primary aim should be to seek improvement and to facilitate the opportunity to openly discuss a problem or issue, outlining the necessary action and behaviour in order to satisfactorily resolve the issue.

Any matters related to meeting the required performance standard would be considered under the Company's Capability Procedure.

Scope

This policy applies to all employees, but except for Section 8 (Suspension) and 9 (Other Penalties) (and to the extent of any procedure implied by statute), it does not form part of their contract of employment.

Policy Statement

CPCL believes that all employees are motivated more by their responsibilities and involvement than by any fear of disciplinary action. CPCL also believes that the majority of employees fully accept the need for its standards and do not find any difficulty in abiding by them. However, there are some employees who do fail to achieve the required standards of work or conduct. In these cases, disciplinary action will be taken in a fair, consistent and reasonable manner.

The maintenance of discipline is the responsibility of managerial and supervisory staff at all levels. Furthermore, overlooking a minor disciplinary offence at this early stage may result in the situation escalating, leading to the need for more serious disciplinary action later.

Managers should consult with the People and Organisation Department before taking any disciplinary action, whether formal or informal, in order to encourage an informed, fair and consistent approach. At any stage during the disciplinary procedure an employee may confidentially seek advice from the People and Organisation Department.

Misconduct

The following are illustrative of the matters that may potentially be of sufficient gravity to invoke the disciplinary procedure.

Examples include, but are not limited to:

- Insubordination
- Poor time keeping
- Refusing or neglecting to carry out a reasonable instruction
- Irresponsible or offensive behaviour
- Unacceptable standards of personal appearance

- If an employee has a restricted right to work in the UK, they are required to keep the Company updated with changes in residential address, home telephone number, mobile telephone number and UK immigration status to enable the Company to meet statutory and regulatory obligations of the UK immigration system. Such changes must be reported within five working days of the change occurring.
- Any other act of misconduct not mentioned above which the company considers appropriate for some form of disciplinary action.

Employees are also referred to the section below entitled 'gross misconduct'.

Informal Disciplinary Procedure and Counselling

The maintenance of discipline and good working practices does not necessarily require the use of formal procedures.

Managers should seek advice on such matters from the People and Organisation Department, which will be able to advise if informal steps are more appropriate. Counselling or informal warnings may be a more satisfactory method of resolving problems than formal disciplinary action. The objective of any such action is to help the employee improve. Therefore, counselling, coaching or informal warnings should normally be given unless the offence is repeated or serious enough to warrant recourse to the formal procedure.

Managers should retain their own notes of informal warnings, as they may be relevant if formal disciplinary action is taken later. It is of paramount importance that these notes are kept securely and confidentially and therefore managers should forward their notes to the People and Organisation Department. The notes will remain active on the employee's file for one year, unless the disciplinary action is extended, in which case they will remain live for that extended period.

If the informal procedure has not accomplished the desired effect, or if the conduct warrants more serious action, formal disciplinary procedures should be immediately invoked.

Formal Disciplinary Procedure

Prior to a disciplinary hearing being held, an appropriate level of investigation into the circumstances of the allegation(s) will be conducted either by the employee's manager or with assistance from the People and Organisation Department.

In all cases where the disciplinary procedure is invoked, regardless of the stage, the manager should first establish the facts promptly before recollections fade, taking into account the statements of any relevant witnesses. Before a decision is made or a penalty imposed, the individual must always be given the opportunity to state their case. The employee is not entitled to be accompanied at any investigatory meeting held. Whether such a meeting is required will be determined by the People and Organisation Department in its discretion. Any disciplinary action taken should be fair and reasonable and account should be taken of the employee's record and any other relevant circumstances.

If the case appears to warrant disciplinary action, the following procedure should be observed. The procedure, however, may be implemented at any stage if the employee's alleged infringement or misconduct warrants such action.

At all formal disciplinary meetings employees have the right to be accompanied by a work colleague or a trade union official. The company reserves the right to ask the employee to choose another person to accompany them if it considers that the choice of companion is unreasonable, if, for example:

- in the company's reasonable opinion, the companion may have a conflict of interest or may prejudice the meeting; or
- the companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards.

The company may, in its discretion, allow a companion who is not a colleague or union representative (for example, a family member) if this will help accommodate a disability, or if the employee has difficulty understanding English.

The level of investigation carried out will be determined by the employee's manager, together with the People and Organisation Department, and will depend on the nature of the allegation.

Stage One - Verbal Warning

Where an informal warning has not instigated the required change or where the offence warrants moving directly to the formal procedure, for minor offences a verbal warning may need to be considered. In this event the employee will be asked to attend a disciplinary hearing where they will have the right to be accompanied by a work colleague or a trade union official.

In advance of the meeting, the employee will be given written details of the complaint made against them and, so far as practicable, copies of any available evidence.

Whenever practicable the hearing will be held at a mutually convenient time and at least twenty-four hours' notice of the hearing will be given. The employee must take all reasonable steps to attend. If the employee's chosen companion is unavailable on the proposed date of the hearing, the hearing may be postponed by up to five working days at the employee's request and subject to the employee proposing an alternative time and date which is within five working days of the original date.

Procedure at The Hearing

The hearing will normally be conducted by the employee's manager and a representative from the People and Organisation Department. Notes of the meeting will normally be taken and copies made available to the employee. At the hearing, the procedure will be as follows:

The employee's manager or the People and Organisation representative will open the hearing by explaining the reasons why the hearing has been arranged and detailing the allegations;

The employee will then be given the opportunity to respond to the allegations and, where appropriate, either party may ask for witnesses to attend;

The detail of the employee's response will then be discussed until the full content of their response has been clarified;

At any time, any witnesses present may add their input to the hearing;

The hearing will then be adjourned whilst a decision is taken as to what action is appropriate and whether further investigation is necessary.

The employee will be informed as to what action, if any, is being taken and the appeals procedure will be explained. This will be confirmed to the employee in writing.

If a warning is necessary, the employee will be informed that their conduct is expected to improve to an acceptable standard within a specified time. As far as possible, specific objectives will be given to establish the accepted standard.

When a verbal warning has been issued it will specify that if conduct has not been sufficiently improved or further acts of misconduct which are of a similar nature have occurred within the specified time, Stage Two of the procedure will be invoked. In cases of further misconduct within the specified time, action may be taken immediately to implement Stage Two or Stage Three without waiting until the time scale has elapsed.

The outcome of the hearing will be confirmed to the employee in writing and notes of the discussion will be retained on the employee's file. These will typically be disregarded for further disciplinary purposes twelve months after the hearing.

Stage Two - Written Warning

In the case of more serious offences, a repeat of the conduct for which the verbal warning was given, or an accumulation of minor offences, after a Stage One verbal warning, a written warning may be warranted. As with the verbal warning, the employee will be asked to attend a disciplinary hearing arranged by their immediate supervisor/manager where they have the right to explain their case, respond to the complaint against them, and be accompanied by a work colleague or a trade union representative.

In advance of the meeting, the employee will be given written details of the complaint made against them and, so far as practicable, copies of any available evidence in advance of the meeting. The hearing procedure will be similar to that of Stage One.

The meeting typically will be chaired by an appropriate senior manager, with a People and Organisation representative present or by a People and Organisation Manager with an appropriate senior manager present. Whenever practicable the hearing will be held at a mutually convenient time and at least twenty-four hours' notice of the hearing will be given. The employee must take all reasonable steps to attend. If the employee's chosen companion is unavailable on the proposed date of the hearing, the hearing may be postponed by up to five working days at the employee's request and subject to the employee proposing an alternative time and date which is within five working days of the original date.

If a written warning is necessary, the employee will be informed that if further acts of misconduct occur, Stage Three will be invoked. As in Stage One, conduct will be expected to improve to an acceptable standard within the specified time scale.

The outcome of the hearing will be confirmed to the employee in writing and notes of the disciplinary action will be retained on the employee's file. These will typically be disregarded for further disciplinary purposes twelve months after the hearing. As with Stage One, any further infringements may be dealt with immediately.

Stage Three – Final Written Warning

In the case of a very serious first offence or offences, or if the required improvement has not been made during the currency of a prior written warning, a final written warning may be warranted. As with the previous stages, the employee will be asked to attend a disciplinary hearing where they have the right to explain their case, respond to the complaint against them and be accompanied by a work colleague or a trade union official.

In advance of the meeting, the employee will be given written details of the complaint against them and, so far as practicable, copies of any available evidence. The hearing process will be like that of Stages One and Two. Wherever practicable the hearing will be held at a mutually convenient time and at least twenty-four hours' notice of a hearing will be given. The employee must take all reasonable steps to attend. If the employee's chosen companion is unavailable on the proposed date of the hearing, the hearing may be postponed by up to five working days at the employee's request and subject to the employee proposing an alternative time and date which is within five working days of the original date.

If a warning is necessary, the employee will be informed that if further acts of misconduct occur, they may be dismissed from CPCL's employment. As in the other stages, conduct will be expected to improve to an acceptable standard within the specified time. The outcome of the hearing will be confirmed to the employee in writing and notes of the disciplinary hearing will be retained on the employee's file. These will typically be disregarded for further disciplinary purposes twenty-four months after the hearing.

Stage Four – Dismissal

In cases of gross misconduct, or if the required improvement has not been made following a prior final written warning, dismissal, with or without notice, may be warranted. Gross misconduct is defined below.

As with the previous stages, the employee will be asked to attend a disciplinary hearing where they have the right to explain their case, respond to the complaint against them and be accompanied by a work colleague or a trade union official.

In advance of the meeting, the employee will be given written details of the complaint against them and, so far as practicable, copies of any available evidence. The employee must be informed that their future employment is at risk and that they may be dismissed as a result of the hearing. The employee must take all reasonable steps to attend. If the employee's chosen companion is unavailable on the proposed date of the hearing, the hearing may be postponed by up to five working days at the employee's request and subject to the employee proposing an alternative time and date which is within five working days of the original date.

After consideration of the facts, if the decision is taken to dismiss the employee, the reasons for the dismissal will be confirmed in writing as soon as possible and, in any case, within fourteen days of the effective date of dismissal. Dismissal for gross misconduct will always be summary (no notice period and no compensation). When disciplinary action other than dismissal is taken, for whatever reason, at this stage the employee will be warned that if further acts of misconduct occur whilst the warning is still "active", Stage Four will be re-invoked. As with all other stages, in actions short of dismissal the employee will receive a letter confirming the outcome of the hearing and the consequences of any further action. If dismissal is not called for, any action at this stage will typically remain "active" on the employee's file for twenty-four months following the disciplinary hearing.

Alternatives to dismissal

In some cases, the Company may in its discretion consider alternatives to dismissal as a disciplinary sanction. These will typically be authorised by the People and Organisation Department and will usually be accompanied by a final written warning. Examples include:

1. Demotion.
2. Transfer to another department or job.
3. A period of suspension without pay.
4. Loss of seniority.
5. Reduction in pay.
6. Loss of future pay increment or bonus.

Appeal

Any employee who believes the outcome of the disciplinary procedure is wrong or unjust may appeal to a member of management senior to the manager who has taken the decision or to the VP, People and Organisation. This must be done without undue delay, ideally within five working days of the disciplinary decision being communicated to the employee following the disciplinary hearing. The appeal should be made in writing and should clearly state the full basis on which the appeal is to be made. One appeal will be allowed at each stage of the formal disciplinary procedure. The details of who the employee should appeal to will be confirmed at the relevant time.

If the appeal is against a dismissal, the date on which the dismissal takes effect will not be delayed pending the outcome of the appeal. However, if the appeal against dismissal is successful the employee will be re-instated with no loss of continuity or pay.

Following receipt of the appeal, the employee will be asked to attend a hearing where they have the right to be accompanied by a work colleague or trade union official who may address the hearing but may not answer questions on the employee's behalf. This will be confirmed in writing prior to the hearing. The employee must take all reasonable steps to attend. If the employee's chosen companion is unavailable on the proposed date of the appeal hearing, the hearing may be postponed by up to five working days at the employee's request and subject to the employee proposing an alternative time and date which is within five working days of the original date.

Where possible the appeal hearing will be conducted by a senior manager or director who has not been previously involved directly in the case.

If any new matters are raised in the appeal the company may need to carry out further investigation. If any new information comes to light the company will provide the employee with a summary including, where appropriate, copies of additional relevant documents and witness statements. The employee will have a reasonable opportunity to consider the information before the hearing.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at the Company's discretion depending on the circumstances of the case. In any event the appeal will be dealt with as impartially as possible.

Following an appeal, the Company may: (a) confirm the original decision; (b) revoke it; or (c) substitute a different penalty.

The employee will be informed of the appeal decision in writing as soon as possible, ideally within ten working days of the appeal hearing, and will be final.

Suspension

At any stage during the formal disciplinary procedure an employee may be suspended on full pay whilst further investigation takes place to establish the appropriate facts and what disciplinary action (if any) is to be taken. Any decision to suspend will be confirmed in writing as soon as reasonably practicable. During any period of suspension, an employee must remain available for contact and available for work during normal working hours.

A suspension usually lasts from between twenty-four hours to ten working days but may be extended where it is not reasonably practicable to complete a full investigation within this time.

This Section forms part of every employee's contract of employment.

Other Penalties

As an alternative to a warning or a dismissal there may be circumstances that warrant other penalties. These include sanctions such as suspension from work without pay or with reduced pay for a maximum of one month and/or such transfer or demotion as the company considers reasonable under the circumstances, based upon the employee's position and the nature of the disciplinary action taken.

This Section forms part of every employee's contract of employment.

Gross Misconduct

Gross misconduct includes offences which indicate a blatant disregard for company rules and standards; they are offences of such a serious nature that they cannot reasonably be condoned and will normally result in summary dismissal. Where gross misconduct is alleged, the employee will often be suspended immediately with or without pay, at the Company's discretion. Where an employee is suspended the procedure under 'Suspension' above will be followed. If dismissal is a possibility at the hearing, the employee will be informed that their future employment is at risk prior to that hearing.

Examples of gross misconduct, which will render an employee liable to summary dismissal, include, but are not limited to:

- Theft or attempted theft of property belonging to the company, or any employee or third party
- Commercial or personal gain through unauthorised exchanging or selling of company products
- Violation of the Code of Business Conduct, Anti-Bribery Policy or IT Policies.
- Fraud/falsification of company records or documents, including expenses
- Physical assault/violence at work or at a work-related function
- Acts of indecency at work or at a work-related function
- Malicious damage or sabotage to company property

- Disclosure of confidential company information to third parties
- Misuse of confidential company information
- Serious breaches of safety or security regulations
- Incapability at work through the use of drugs or alcohol
- Use at work or at a work-related function of illicit drugs
- Gross insubordination
- Unauthorised absence
- Violation of the Equal Opportunities Policy or Harassment Policy (for harassment, bullying & victimisation)
- Serious breach or misuse of company policies on leaves of absence
- Any misrepresentation or false statement made during the job application process
- Unauthorised or inappropriate use of the company's property including the computer system
- Being charged with or convicted of a criminal offence arising from or related to the employee's work for the company or exposing the company or its officers to liability for such an offence
- Being charged with or convicted of a criminal offence committed outside working hours which may adversely affect the company's business reputation or reflect on the employee's suitability for the type of work which they perform or which affects their acceptability to other employees