

Dignity at Work**1. Policy Statement**

Keltech is committed to providing all of its employees with an environment where the dignity of each individual is respected and assured. Appropriate disciplinary action, including dismissal for serious offences, will be taken against any employee who violates this policy.

2. Purpose

The purpose of this policy is to outline the procedure at Keltech. for dealing with the issue of bullying, harassment and sexual harassment in the workplace.

3. Scope

- 3.1. The policy applies to employees both in the workplace and at work-associated events such as meetings, conferences and work-related social events, whether on the premises or off-site.
- 3.2. The policy applies to bullying, harassment and sexual harassment not only by fellow employees but also by a client, customer or other business contact with whom an employee might reasonably expect to come into contact in the course of his/her employment.

4. Responsibilities

All employees of Keltech. must comply with this policy and procedure. All employees have a responsibility to take appropriate measures to ensure as best possible a working environment free from bullying, harassment and sexual harassment.

5. Definitions**5.1. Bullying**

- 5.1.1. 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 reasonably be regarded as undermining the individual's right to dignity 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.
- 5.1.2. The bullying can include conduct offensive to a reasonable person, e.g. oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti or other material which state/imply prejudicial attitudes which are offensive to fellow employees. Other examples of bullying behaviour may include, but are not limited to:
 - 5.1.2.1. Personal insults and name calling
 - 5.1.2.2. Persistent unjustified criticism and sarcasm
 - 5.1.2.3. Public or private humiliation
 - 5.1.2.4. Shouting at staff in public and/or private
 - 5.1.2.5. Sneering
 - 5.1.2.6. Instantaneous rage, often over trivial issues
 - 5.1.2.7. Unfair delegation of duties and responsibilities

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- 5.1.2.8. Setting impossible deadlines
- 5.1.2.9. Unnecessary work interference
- 5.1.2.10. Making it difficult to have access to necessary information
- 5.1.2.11. Aggression
- 5.1.2.12. Not giving credit for work contribution
- 5.1.2.13. Continuously refusing reasonable requests without good reasons.
- 5.1.2.14. Intimidation and threats in general

5.2. Harassment

5.2.1. Harassment on the grounds of gender, civil status, family status, sexual orientation, religious belief, age, disability, race, or membership of the traveller community is defined as any unwanted conduct 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.

5.2.2. The unwanted conduct may consist of acts, requests, spoken words, gestures, or the production, display or circulation of written words, pictures or other material.

5.3. Sexual Harassment

5.3.1. Sexual Harassment can be defined as conduct towards another person, which is sexual in nature or has a sexual dimension, and is unwelcome to the recipient. Examples of this type of harassment may include, but are not limited to:

- 5.3.1.1. Sexual gestures
- 5.3.1.2. Displaying sexually suggestive objectives, pictures, calendars
- 5.3.1.3. Sending suggestive and pornographic correspondence including faxes, text messages or e-mails
- 5.3.1.4. Unwelcome sexual comments and jokes
- 5.3.1.5. Unwelcome physical conduct such as pinching, unnecessary touching, etc.

6. General Principles

- 6.1. Employees can be assured that any complaints in relation to workplace bullying, harassment or sexual harassment will be dealt with respectfully, sensitively, swiftly and in the strictest confidence.
- 6.2. Any alleged perpetrator of bullying, harassment or sexual harassment will be dealt with in accordance with the principles of natural justice.
- 6.3. If any employee feels that they are being subjected to bullying, harassment or sexual harassment in any form, they should not have to tolerate it.
- 6.4. Employees who feel they are being subjected to bullying, harassment or sexual harassment should keep a written record of names, dates, times and nature of the incidents.

7. Complaints Procedures**7.1. Informal**

- 7.1.1. It is preferable for all concerned that complaints of bullying, harassment or sexual harassment are dealt with informally whenever possible. This is likely to produce solutions that are speedy, effective and conducive to a positive working environment. Thus, in the first instance a person who believes that he/she is the subject of bullying/harassment/sexual harassment should ask the person(s) responsible to stop the offensive behaviour.
- 7.1.2. A person may seek help and advice on a confidential basis from the designated contact person (Tom Ryan), particularly where a person finds it difficult to approach the alleged perpetrator(s) directly. The role of the designated contact person is not to judge but rather to provide advice and assistance about the Company's policy and options to resolve a concern.
- 7.1.3. A complainant may decide, for whatever reason, to bypass the informal procedure.

7.2. Formal

- 7.2.1. If the employee wishes to make a formal complaint they should put this complaint in writing and submit it to (Lorna Mc Grath - HR Coordinator) as soon as possible. All complaints will be treated seriously, confidentially and dealt with as soon as is practicable.
- 7.2.2. The complaint will be subject to an initial examination by the HR Coordinator with a view to determining an appropriate course of action. An appropriate course of action at this stage, for example, could be to explore the use of mediation or to examine if the issue can be resolved informally. Should such options 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).
- 7.2.3. The main objective of the investigation is to ascertain, on the balance of probabilities, whether the behaviour complained of occurred or not.
- 7.2.4. The complainant will be kept informed of progress during the investigation. The facts of the case will be checked as discreetly as possible.
- 7.2.5. In the interests of natural justice, the alleged bully/harasser will be made aware of the nature of the complaint and will be given every opportunity to rebut the detailed allegations made.
- 7.2.6. Strict confidentiality and proper discretion will be maintained, as far as possible in any necessary consultation to safeguard both parties from innuendo and harmful gossip.
- 7.2.7. It may be deemed appropriate to obtain information from witness(es). In such instances confidentiality will be stressed at all times.
- 7.2.8. A record of all relevant discussions that take place during the investigation will be maintained by Keltech.
- 7.2.9. It is the right of all parties concerned to be accompanied by a fellow employee at an investigation meeting.

8. Appeals

- 8.1. Both parties have the right to appeal the outcome of the investigation. The reason for the appeal must be presented in writing to management within 5 days.

- 8.2. The appeal will be heard and investigated by Managing Director, Ray Breen.
- 8.3. The grounds for the appeal and any outcome and methodology employed will be recorded and appended to the investigation file.

9. Action Post Investigation

- 9.1. Should a case of bullying, harassment or sexual harassment be proven then a disciplinary hearing will take place and Keltech. will take appropriate disciplinary action. The disciplinary action will be taken in line with the Company's disciplinary policy. This can include a warning, demotion or other appropriate action up to and including dismissal. Records of any warnings for bullying, harassment or sexual harassment will remain on the employee's file as appropriate.
- 9.2. Regular checks will be made to ensure that the bullying, harassment and/or sexual harassment has stopped and that there has been no victimisation for referring a complaint in good faith. Retaliation of any kind against an employee for complaining or taking part in an investigation concerning bullying, harassment or sexual harassment at work is a serious disciplinary offence.

10. 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.

11. Monitoring

The Company's dignity at work policy will be reviewed on a regular basis to assess the effectiveness of its implementation and operation in creating a truly integrated workplace.