

**SPENCER
OGDEN
EXTERNAL
ZERO
TOLERANCE
POLICY**

EXTERNAL ZERO TOLERANCE POLICY

Introduction and Scope

This policy outlines the types of behaviours that the business does not tolerate both towards and from its staff and should act as a guide for our external stakeholders.

It applies to anyone that interacts with a member of Spencer Ogden's workforce (including clients and contractors) through any form of communication.

Spencer Ogden prides itself on the steps it takes and commitment that it makes to providing its staff with a safe workplace where mutual respect is given.

Unacceptable Behaviours

Below are several of the behaviours that the business does not deem as acceptable. Please note that this is not an exhaustive list but should provide some guidance around our expectations.

Harassment and Sexual Harassment

Spencer Ogden considers harassment (in any form, including sexual harassment) to be unacceptable and potentially unlawful.

Harassment is defined as unwanted conduct that has the purpose or effect of violating the dignity of a person or of creating an intimidating, hostile, degrading, humiliating or offensive environment. This conduct will be unwanted by the recipient and can include physical, verbal, or nonverbal conduct. It can also include circulating information or images via e-mail or the internet.

Sexual harassment can be defined as unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating the recipient's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient.

Aggressive, Threatening or Abusive Behaviour

Spencer Ogden deems it unacceptable for any form of aggression, threat or abuse to be directed towards our staff.

Aggressive, threatening or abusive behaviour includes language (verbal or written) that may cause staff to feel afraid or vulnerable. Examples of such behaviour may include threats, personal verbal abuse, derogatory remarks or rudeness.

Abusive behaviour may also include inflammatory statements, remarks of a racial or discriminatory nature and unsubstantiated allegations.

Unreasonable Demands

Spencer Ogden will consider a demand to be unreasonable when it understands it to have an excessive impact on the work of our staff or when dealing with the matter takes up an excessive amount of time and resource, preventing our staff from carrying out their duties.

Implementing the Zero Tolerance Policy

The business will manage behaviour we consider falling under the above categories in line with our internal policy, details of which are outlined below.

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- Our staff have the authority to advise individuals their behaviour is unacceptable and to ask for it to stop.
- Should the behaviour continue our staff have the authority to immediately cease communicating with the perpetrator and/or their employer.
- Our staff will report the incident(s) to our internal Human Resources Team to take action that they deem appropriate to the circumstances.

The business will confirm the action taken to the appropriate personnel following our internal investigation. Please note that should the business consider it appropriate to do so, in extremely serious instances, we may make the decision to contact the authorities.

External Stakeholder Protection

Although, this policy is created with the intention to protect our workforce, we recognise that the individuals we as a business interact with deserve to be treated with equal amounts of dignity and respect. For this reason, we have taken reasonable steps to educate our staff on acceptable behaviours, to protect those with whom they interact.

This policy is overseen by Spencer Ogden's Human Resources and Compliance Departments, any comments or concerns may be directed to askhr@spencer-ogden.com or emeacompliance@spencer-ogden.com.