



Dignity at Work Policy

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Introduction

dnata is committed to providing a working environment where all employees are treated with dignity and respect. This policy aims to prevent all forms of bullying, harassment, sexual harassment, discrimination, and/or victimisation. It also aims to promote respectful and professional behaviour by providing clear procedures for reporting concerns.

Scope

This policy covers all employees within dnata in the UK and applies to all individuals working for dnata at all levels and grades, including directors, employees, apprentices, graduates, home workers, part-time and fixed term employees (collectively known as employees in this policy). It covers behaviour in the workplace, at work related events and travel, online communication (email, messaging, social media) and interactions with clients, customers, and other third parties.

Policy Statement

This policy supports dnata's responsibilities under the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025.

The company's Dignity at Work Policy is based on the principle that each employee has the right to:

- ✔ Work in an environment free from bullying, harassment, sexual harassment, discrimination, and victimisation.
- ✔ Be treated with dignity, respect, and courtesy.
- ✔ Raise concerns without fear of retaliation.
- ✔ Have complaints investigated fairly, promptly, and confidentially.

Bullying, harassment, sexual harassment, discrimination, and victimisation can affect people in many ways. It can lead to illness, increased absenteeism, poor performance, and an apparent lack of commitment. dnata acknowledges that distinguishing characteristics of these forms of behaviours is that employees subjected to them are sometimes very vulnerable and are often reluctant to raise concerns.

Managers will be responsive and supportive to any employee who raises a concern about being subject to or witnessing any of these forms of unwanted behaviour. An employee may raise a complaint if they feel, or have witnessed someone being, bullied, harassed, discriminated against, and/or victimised even if the behaviour was not intended to offend or was intended to offend but did not have that effect.

When deciding whether conduct has had this effect, dnata will consider the individual's perception, the wider circumstances of the case and whether it was reasonable for the conduct to have that effect.



Unwanted behaviour can include a one-off incident, repeated behaviour, spoken words (banter), written words, imagery, graffiti, gestures, mimicry, jokes, pranks, or physical behaviour that affects an individual.

Definitions

Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour that undermines a person's dignity, confidence, or wellbeing.

Examples include (but are not limited to):

- ✔ Persistent criticism or humiliation.
- ✔ Shouting or aggressive behaviour.
- ✔ Unreasonable workloads or deadlines.
- ✔ Deliberate exclusion.

Harassment

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating or hostile, degrading, humiliating, or offensive environment connected to any of the following protected characteristics: age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Sexual harassment is usually directed at an individual however it can also be a culture of behaviour that is not specifically aimed at one individual.

Examples include (but are not limited to):

- ✔ Unwelcome sexual advances or physical contact.
 - ✔ Sexual comments, jokes, or gestures.
 - ✔ Sexualised banter or discussion.
 - ✔ Displaying sexually explicit material.
 - ✔ Sending inappropriate messages or images.
 - ✔ Intrusive questions about a person's private or sex life.
 - ✔ Verbal, non-verbal, and physical conduct.
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- ✔ Online/digital sexual harassment.
- ✔ Comments about a person's body, appearance, or clothing.
- ✔ Repeated requests for dates after refusal.
- ✔ Sexualised workplace cultures.

dnata is committed to proactively prevent sexual harassment through training, awareness, risk assessments, and clear behavioural expectations for suppliers, clients, customers, trade unions, and other third parties.

Third-Party Harassment & Sexual Harassment

Third-party harassment occurs when an individual is subjected to harassment by a third party in relation to a protected characteristic, as outlined in the harassment definition within this policy.

Third-party sexual harassment occurs when an individual is subjected to sexual harassment by a third party. We recognise our duty to take all reasonable steps to prevent sexual harassment, including from third parties.

Third parties include, but are not limited to, customers, clients, passengers, airline representatives, suppliers, contractors, agency personnel, trade unions, visitors and members of the public.

Discrimination

Discrimination is where someone is put at a disadvantage or treated less favourably because of a protected characteristic. Under the Equality Act 2010 protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Victimisation

Victimisation occurs when someone is subjected to a detriment because they:

- ✔ Carried out, or believed to have carried out a protected act, including raising a complaint under the Whistleblowing Policy.
- ✔ Made a complaint.
- ✔ Supported another person's complaint.
- ✔ Provide evidence in an investigation.



Employer Responsibilities

dnata will take all reasonable steps to prevent harassment and sexual harassment, including:

- ✔ Carrying out appropriate risk assessments of roles involving third party contact, work-related travel, overnight stays, and social events. These will be reviewed annually and should workplace arrangements materially change. Risk assessments will also be reviewed regularly including after any incidents.
- ✔ Providing mandatory training for employees and additional training for managers on handling complaints.
- ✔ Setting clear behavioural expectations for third parties, including displaying or communicating zero-tolerance statements where appropriate.
- ✔ Having robust reporting processes that are accessible and confidential.
- ✔ Communicating our Dignity at Work policy with existing and new clients, customers, and suppliers.
- ✔ Regularly reviewing the effectiveness of controls and this policy.
- ✔ Taking proactive action when incidents occur and risks are identified.
- ✔ Regularly refreshing awareness of standards and expectations.
- ✔ Monitoring trends and data.
- ✔ This policy, the training (including refresher training), risk assessments, and third party communications will be subject to compliance audits.

Manager Responsibilities

In addition to their responsibilities as an employee, managers will:

- ✔ Promote respectful behaviour.
- ✔ Respond to or escalate where required, concerns promptly.
- ✔ Support employees who raise concerns.
- ✔ Review local risks.

Employee Responsibilities

All individuals must:

- ✔ Treat others with dignity and respect.
- ✔ Not engage in harassment or inappropriate behaviour.



- ✔ Report incidents of harassment, whether experienced personally or witnessed, by emailing safespace@dnata.co.uk.
- ✔ Support colleagues who raise concerns.
- ✔ Challenge inappropriate behaviour where safe and appropriate to do so.

Reporting and Handling Concerns

Concerns can be reported via:

- ✔ Employee's line manager or the next appropriate level of management if necessary.
- ✔ Local HR department.
- ✔ Through the company dedicated email address: safespace@dnata.co.uk.
- ✔ Through the Group confidential reporting line Speak Up: speakup@dnata.com.

Employees are encouraged to report incidents as soon as possible, to ensure they are effectively investigated, however there is no time limit on raising concerns.

All reports will be taken seriously and handled promptly and sensitively. A fair and impartial investigation will be carried out, and appropriate action taken. Information will be treated confidentially, as far as reasonably practicable. No one will be treated unfairly for raising a concern, supporting a complaint, or participating in an investigation.

The Procedure

When a complaint has been made it will be investigated thoroughly and as quickly as possible ensuring the rights of the complainant and those of the alleged perpetrator(s) are protected.

Informal

An informal approach may be appropriate where the individual raising a concern wishes to use it and the nature of the concern makes it suitable. This should not discourage anyone from pursuing a formal procedure where they prefer that option. Furthermore, there may be some instances where the seriousness of the concern warrants formal action and possibly criminal proceedings. Formal procedures may also be necessary where a previous informal approach has failed.

The company may escalate to formal investigation where necessary (i.e. serious allegation, repeated behaviours etc).

If the individual feels able to, they may raise their concerns directly with the person whose behaviour is creating the situation, explaining that the conduct is unwelcome, offensive, or interfering with work.

Alternatively, the concern may be raised with the relevant departmental manager or HR representative, which may be particularly helpful if the concern relates to an employee's direct supervisor.



If the individual does not feel comfortable raising the matter with their manager, a senior manager within the business, or HR then they may raise their concerns to a director as outlined in the company's Whistleblowing Policy.

Formal Procedure

The company's formal Grievance Procedure may be used, however in some cases involving a complaint regarding a supervisor or manager, the complainant may go directly to a senior manager or HR representative.

The following will apply to the formal procedure:

- ✔ Prompt, thorough, and impartial investigation with due regard to the rights of both the complainant and the alleged perpetrator.
- ✔ Temporary workplace measures may be considered where necessary to protect those involved or preserve the integrity of the investigation. These may include changes to reporting lines, duties, shifts or work location. Suspension will only be considered where there is no reasonable alternative, will normally be on full pay, will not imply guilt and will be kept under regular review. Care will be taken to ensure that any measures do not unfairly disadvantage the person who raised the concern.
- ✔ Investigating managers or support must not be connected with the allegation.
- ✔ The right for both parties to be accompanied by a work colleague or an official representative of a Trade Union.
- ✔ Clear details of the complaint and the timescales for a response.
- ✔ Commitment to timescales for the resolution of problems.
- ✔ Investigations based on objectivity rather than preconceptions.
- ✔ Information will be shared only where there is a legitimate need to know, including where necessary to investigate the concern fairly, take protective or disciplinary action, meet legal obligations or protect the safety of individuals. Absolute confidentiality cannot be guaranteed, but information will be handled sensitively and shared as narrowly as reasonably practicable.
- ✔ Where necessary, referral to a disciplinary hearing which could result in disciplinary action being taken.
- ✔ A record of complaints will be kept which will include names of parties, date, nature and frequency of incidents, and action taken.
- ✔ Any retaliation as a result of someone raising a concern will not be tolerated and will be dealt with under the company's Disciplinary Policy.



No action will be taken against a person simply because a complaint is not upheld. However, where there is evidence that a person has deliberately made an allegation, they know to be false, or has knowingly provided false or misleading information, the matter may be considered under the Disciplinary Policy.

If any employee has any queries or concerns regarding this document, they should raise them with their line manager.

Sexual harassment is recognised in UK law as a qualifying disclosure under whistleblowing legislation, meaning disclosures relating to sexual harassment attract whistleblowing protection. Workers raising concerns about sexual harassment are therefore entitled to whistleblowing protection, including protection from detriment and, for employees, unfair dismissal. For further information please refer to the Whistleblowing Policy.

Employee Assistance Programme and Mental Health Support

We recognise that workplace concerns can sometimes be difficult to deal with and may have an impact on employees. Employees have access to a confidential 24-hour Employee Assistance Programme (EAP), which provides telephone counselling and online support. Employees are encouraged to make use of this service if they feel it would be helpful to talk to someone about their concerns.

Employee Assistance Programme

- ✔ Telephone: 0800 015 5630
- ✔ Online: my.healthhero.com
 - ✔ Activation Code: AVIVAPROTECTION
 - ✔ Registration Code: AVIVAPROTECTION

In addition, Mental Health and Wellbeing support, including access to trained Mental Health First Aiders, is available to provide guidance, information, and signposting to further help if needed.

Mental Health and Wellbeing resources:

Online: <http://intranet.dnata.co.uk/mental-health-and-wellbeing/mental-health-resources>

Other Relevant Policies

- ✔ Whistleblowing.
- ✔ Equality, Diversity and Inclusion.
- ✔ Grievance.
- ✔ Disciplinary.