

Anti-Harassment Policy

Effective Date: 18th October 2025

Last Updated: 18th October 2025

Applies to: Viamed Ltd, Vandagraph Ltd, Vandagraph Sensor Technologies Ltd

1. Policy Statement

At Viamed Ltd, Vandagraph Ltd, and Vandagraph Sensor Technologies Ltd (collectively "the Company"), we are committed to providing a safe, respectful, and inclusive working environment, free from all forms of harassment. The Company will not tolerate any conduct that constitutes harassment or discrimination, and we will take all necessary steps to prevent and address such behaviour in the workplace.

This includes our legal duty under the Worker Protection (Amendment of Equality Act 2010) Act to take all reasonable steps to prevent sexual harassment in the workplace.

2. Purpose

The purpose of this policy is to outline the Company's zero-tolerance approach to harassment and ensure that all employees, contractors, customers, and third parties are treated with dignity and respect. This policy complies with all relevant laws and regulations, including the new legal requirements enforced by the Equality and Human Rights Commission (EHRC).

3. Scope

This policy applies to all employees, directors, owners, contractors, and third parties associated with Viamed Ltd, Vandagraph Ltd, and Vandagraph Sensor Technologies Ltd, regardless of location. It covers behaviour in the workplace, during work-related activities outside the workplace, and online interactions.

4. Definition of Harassment

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment. Harassment can take many forms, including but not limited to:

- **Verbal Harassment:** Offensive comments, jokes, slurs, or unwanted remarks about a person's appearance, age, race, religion, gender, sexuality, or any other protected characteristic.
- **Physical Harassment:** Unwanted physical contact, invasion of personal space, or threatening behaviour.
- **Sexual Harassment:** Unwanted sexual advances, comments, or requests for sexual favours, as well as inappropriate gestures or physical acts.
- **Non-Verbal Harassment:** Inappropriate gestures, visual displays, or the circulation of offensive material via email or other means.
- **Third-party Harassment:** Harassment may also be committed by third parties such as customers, clients, contractors, or visitors. These incidents are treated as seriously as internal cases and must be reported through the same process.

Harassment is not limited to direct communication and can occur through written, electronic, or visual forms, including social media and other digital platforms.

5. Responsibilities

All Employees:

Every employee is responsible for maintaining a respectful workplace and must refrain from any behaviour that could constitute harassment or discrimination. Employees are encouraged to report any incidents of harassment they experience or witness.

Managers and Supervisors:

Managers and supervisors are responsible for enforcing this policy, ensuring that their teams are aware of and adhere to the policy, and taking immediate action when a report of harassment is made.

HR Department:

The HR Department is responsible for investigating all reported incidents of harassment and ensuring appropriate actions are taken. HR will maintain confidentiality to the greatest extent possible while conducting a thorough investigation.

6. Reporting Procedures

If any employee believes they have been harassed or have witnessed harassment, they should report the incident as soon as possible. The following options are available:

- Report the incident to a direct supervisor or manager.
- If the supervisor is involved or the employee is uncomfortable reporting to them, they may contact the HR Department directly.
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All reports of harassment will be taken seriously and investigated promptly. The Company is committed to ensuring that no one will face retaliation for reporting an incident in good faith.

7. Confidentiality

The Company will ensure that all complaints of harassment are handled with the utmost discretion. Information about a complaint will only be shared on a need-to-know basis, and any breach of confidentiality by those involved in the investigation process may result in disciplinary action.

8. Investigation and Disciplinary Action

Once a complaint is made, the Company will carry out a prompt, thorough, and impartial investigation. During the investigation, both the complainant and the alleged harasser will be given the opportunity to present their version of events.

If the investigation determines that harassment has occurred, the Company will take immediate and appropriate corrective action. This may include disciplinary measures up to and including termination of employment, depending on the severity of the offence.

9. Training and Prevention

The Company is committed to providing ongoing training to all employees to prevent harassment in the workplace. All employees will receive mandatory harassment prevention training, with additional training provided to managers and supervisors on how to handle complaints and foster a respectful workplace environment.

As part of our duty to prevent harassment, we will carry out regular risk assessments, monitor workplace culture, and provide targeted training to ensure a safe environment for all staff.

10. Monitoring and Evaluation

The Company will regularly review and update its anti-harassment policies to ensure compliance with legal standards and to address emerging issues in the workplace. The effectiveness of this policy will be evaluated periodically through employee feedback, audits, and assessments of workplace culture. A risk assessment will be carried out to ensure there are no areas of concern or missed.

Risk assessments and cultural monitoring will be carried out regularly as part of our ongoing legal duty to evaluate the effectiveness of preventative measures.

11. Use of Confidentiality Clauses

The Company will not use confidentiality clauses to silence victims of harassment or prevent them from seeking justice. Any confidentiality agreements entered into during settlement processes will be used cautiously and only when absolutely necessary.

12. Consequences of Non-Compliance

Failure to comply with this policy can lead to serious consequences, including disciplinary actions and potential legal action. Additionally, non-compliance with this policy may result in increased victim compensation and enforcement action by the EHRC.

Contact Information

If you have any questions about this policy or need to report an incident of harassment, please contact the HR Department.

This policy will be reviewed on an annual basis to ensure its effectiveness.