



# **Anti-Discrimination, Harassment and Bullying Policy**

## 1. Introduction

- 1.1 This Policy explains what is meant by the terms discrimination, harassment and bullying, and what you can do if you witness or experience them.
- 1.2 This Policy is discretionary and not contractual. It will be kept under review and amended from time to time.
- 1.3 True North (collectively "we", "us", "our", "True North") is committed to doing the right thing and acting with integrity and the highest ethical standards, in all our business dealings and relationships around the world, and we expect the same of our people.
- 1.4 This anti-discrimination, harassment and bullying policy ("**Policy**") sets out True North's principles, requirements and procedures in relation to complying with all equal opportunities laws and regulations-
- 1.5 Compliance with this Policy helps protect True North and our people from potential breaches of the anti- discrimination, anti-harassment, anti-sexual harassment and anti-bullying law, regulations, and/or reputational risks.

## 2. Applicable To

- 2.1 This Policy applies to all True North employees, whether permanent or fixed term, casual workers, consultants, freelancers, crew, contractors, agency staff and other temporary workers ("Team Member" or "you") as well as any third parties you interact with such as customers, suppliers or visitors to True North's premises.
- 2.2 Please note that this policy is not just about how you behave towards your colleagues, but everyone you come into contact with at True North.
- 2.3 This policy covers discrimination, harassment, sexual harassment and/or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions.

## 3. Principles

- 3.1 At True North, we work hard to be an inclusive employer, so everyone can be themselves and deliver their best work. It's an important part of being a fair and responsible company.
- 3.2 We want every voice to be heard and every person to feel confident sharing their own perspective so we can share ideas and challenge each other's thinking, bringing even more creativity and innovation to our customers. It's our ambition to be admired as an industry leader for inclusion, both on screen and behind the scenes.
- 3.3 True North is committed to providing a working environment free from discrimination, harassment, sexual harassment and bullying and ensuring all our people are treated, and treat others, with dignity and respect. Discrimination, harassment, sexual harassment and bullying are always unacceptable.

## 4. What does discrimination mean?

- 4.1 Discrimination is treating a person less favourably because they have, are believed to have, or are associated with someone who has a **protected characteristic**.
- 4.2 What is considered a protected characteristic varies among countries, but in the UK these include race, ethnicity, sex, sexual orientation, gender reassignment, religion or belief, age, marital and civil partnership status, disability and pregnancy and maternity.
- 4.3 Discrimination can take many forms:
  - 4.3.1 **Direct discrimination** is when someone is treated less favourably because of a protected characteristic. Examples include:
    - 4.3.1.1 Not considering a Team Member for promotion because they are on maternity leave.
    - 4.3.1.2 Not employing someone because there is a perception that they are "too old" to learn a new role.

- 4.3.1.3 Not considering a Team Member with a disability for a development programme, although they're the best person for the role, because of a perception that they'll take too much time off work.
- 4.3.1.4 Not recruiting someone from an ethnic minority group or someone who is gay because of a perception that they wouldn't fit in with the team.
- 4.3.2 **Indirect discrimination** can happen when there is a way of doing things, a policy or rule in place that applies to everyone but in practice puts someone with a protected characteristic at an unfair disadvantage. These can be formal or informal policies, rules or ways of doing things, and can apply both to practices in the workplace and, for example, arrangements for social events. Examples include:
  - 4.3.2.1 Asking for 10 years' experience in a job advert may be indirect discrimination based on age, as younger people who may still have the skills and qualifications will feel excluded from applying.
  - 4.3.2.2 Requiring all Team Members to work full time may indirectly discriminate against women because they are more likely to care for their children and be unable to fulfil this requirement.
  - 4.3.2.3 Changing a working pattern to include a Saturday may indirectly discriminate against Jewish employees, for whom Saturday is a religious day. This would put Jewish employees at a disadvantage in comparison to those of other faiths.
- 4.3.3 **Failure to make reasonable adjustments** to any workplace practice, workspace or office location which puts a disabled Team Member at a substantial disadvantage compared to those who are not disabled is a form of disability discrimination. Employers must take reasonable steps to remove the disadvantage.
- 4.3.4 **Victimisation** is when someone is treated less favourably by another Team Member because they made or supported a complaint to do with a protected characteristic or harassment (including sexual harassment), or someone thinks they did. For example, a Team Member gives a witness statement as part of an investigation into a sexual harassment claim against their manager, and afterwards their manager starts treating them unfairly by refusing to give them a promotion. True North does not tolerate retaliation - see sections 4.3 and 6.0 for more details on this.

## 5. What does harassment mean?

- 5.1 Harassment is a type of discrimination. It is unwanted verbal, non-verbal or physical conduct which has the **purpose** or **effect** of either:
  - 5.1.1 violating the other person's dignity; or
  - 5.1.2 creating an intimidating, hostile, degrading, humiliating or offensive environment
- 5.2 This may include conduct you find offensive, or which makes you feel intimidated or humiliated. It may involve physical gestures and a single incident can amount to harassment. Even if the behaviour isn't intended to be offensive, or make you feel intimidated or humiliated, it will still be harassment if it's had that effect. An individual can be subject to harassment even if they are not personally a target of the harassing behaviour. Certain behaviours can still be harassment even if the person being harassed does not complain or ask for it to stop.
- 5.3 For example, a person may be harassed by racist jokes about a different ethnic group, as they indicate a lack of respect for others and create an offensive environment, for either the person it is directed to or those present at that time. Harassment also includes treating someone less favourably because they have submitted or refused to submit to such conduct.
- 5.4 Harassment is unlawful if it's related to a protected characteristic, however at True North harassment and unwanted conduct generally is unacceptable even if it does not relate to a protected characteristic.

- 5.5 Examples of harassment may take many forms and may include:
- 5.5.1 Sending or sharing offensive e-mails, text messages or social media content.
  - 5.5.2 Mocking, mimicking or belittling a person's disability, ethnicity, faith, gender identity or sexual orientation.
  - 5.5.3 Purposely and repeatedly misgendering a colleague.
  - 5.5.4 Purposely excluding a colleague from social events, for example, due to them being a parent or bisexual.

## 6. Sexual harassment

- 6.1 The harassment paragraph above applies equally to sexual harassment, with a few specific considerations.
- 6.2 Sexual harassment is a specific type of harassment, which is defined as unwanted verbal, non-verbal or physical conduct of a *sexual* nature which has the **purpose** or **effect** of either:
- 6.2.1 violating the other person's dignity; or
  - 6.2.2 creating an intimidating, hostile, degrading, humiliating or offensive environment.
- 6.3 It can be a one-off incident or an ongoing pattern of behaviour. It can happen in person or in other ways, for example, online in email, social media or messaging.
- 6.4 Sexual harassment can occur regardless of the gender or sexual orientation of the individuals involved and between members of the same or opposite sex, and it does not necessarily have to be motivated by sexual or romantic desire. An individual can be subject to sexual harassment even if he, she or they are not personally a target of the harassing behaviour.
- 6.5 Examples of sexual harassment may include:
- 6.5.1 Unwanted physical conduct or "horseplay" including touching, pinching, pushing, grabbing, and being too close.
  - 6.5.2 Unwelcome sexual advances or suggestive language or behaviour (even if the harasser perceives this as harmless).
  - 6.5.3 Sending sexually explicit emails, text messages, or showing sexually graphic images.
  - 6.5.4 asking intrusive questions of a sexual nature or spreading sexual rumours about a person.
  - 6.5.5 Demanding sexual or romantic consent in return for employment benefits, or to avoid work-related disadvantages.

## 7. Third Party Harassment

- 7.1 Our intention is to create a workplace which is free from harassment generally. This objective extends beyond acts of harassment by those working for True North (as outlined above) and includes an aim to prevent harassment by third parties that you may regularly come into contact with. Third-party harassment happens when someone *outside* your organisation — like a client, customer, contractor, supplier, or visitor — behaves in a way that's offensive, intimidating, or inappropriate toward staff. It can be verbal, non-verbal, physical, or written, and it's just as serious as harassment from colleagues.
- 7.2 Examples of third-party harassment include:
- 7.2.1 Clients making inappropriate jokes or comments of a sexual nature to one of True North's Team Members.
  - 7.2.2 Customers shouting or swearing at staff during a service interaction.
  - 7.2.3 Contractors repeatedly undermining or belittling a Team Member's work.
  - 7.2.4 Visitors making racist or discriminatory remarks to staff.
  - 7.2.5 Suppliers sending aggressive or threatening emails to a Team Member.
  - 7.2.6 Members of the public invading personal space or making unwanted physical contact.

## **8. Summary on Harassment**

8.1 As a headline, our objective includes:

- 8.1.1 Taking harassment seriously: harassment from anyone inside or outside the organisation, including clients, won't be tolerated.
- 8.1.2 Speaking up: if you experience or witness harassment from a third party, please report it. Your safety and wellbeing matter, and we're here to support you.
- 8.1.3 Being proactive: we regularly assess the risk of third-party harassment and review our approach to make sure it stays effective.
- 8.1.4 Your input helps: if you see areas where we could strengthen our protections, please share your thoughts with your manager. We value your perspective.
- 8.1.5 Taking action: we're committed to taking clear, practical steps to prevent harassment from third parties and protect our people.

## **9. What does bullying mean?**

9.1 Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying can be committed by any Team Member against another Team Member.

9.2 Bullying can take the form of physical, verbal, and non-verbal conduct. By way of example, bullying may include:

- 9.2.1 Physical or psychological threats
- 9.2.2 Overbearing and intimidating levels of supervision
- 9.2.3 Inappropriate derogatory remarks about someone's performance.

9.3 Legitimate, reasonable, and constructive criticism of your performance or behaviour, or reasonable instructions given to you in the course of your employment, will not amount to bullying on their own.

## **10. Requirements and Procedures**

10.1 The sections below detail the actions you can take when someone behaves in a way that breaches this policy.

### **10.1.1 Informal Action**

- 10.1.1.1 If you are being discriminated against, harassed, or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable.
- 10.1.1.2 If this is too difficult or embarrassing for you to do on your own, or you are not comfortable that the issue has been resolved adequately, you should speak to your manager and/or HR. If the person concerned is your manager or production supervisor, you should speak to the next level of management or HR. You can also raise your concerns formally.
- 10.1.1.3 If the conduct continues or if it is not appropriate to resolve it informally, you should keep a record of any relevant incidents and follow the formal procedure set out below.

### **10.1.2 Formal Action**

- 10.1.2.1 If informal action has not stopped the behaviour or the situation is too serious to be dealt with informally, you can raise your concerns formally. At True North, there are different ways in which you can do this. Irrespective of which option you choose, we will always arrange for the concerns to be investigated thoroughly and sensitively. Our formal procedure can be found in more detail in our Grievance Policy.

10.1.3 **To all True North Team Members:**

10.1.3.1 You can raise concerns to your manager, the Talent Executive, Welfare Supervisor, Heads of Production and HR.

10.1.3.2 You can also raise concerns through the confidential helpline which is administered by an independent third party. You can choose to give your name and take part in the investigation process, or you can remain anonymous. Anonymity can make it more difficult to investigate any concern raised because we may be unable to obtain further information from you, and so we encourage you to identify yourself where possible. Please note, that if you choose to pursue your complaint and maintain anonymous, we are unable to guarantee total anonymity, as certain aspects of the complaint may reveal information relating to the complainant.

10.1.3.3 You'll find more details about this in our Whistleblowing Policy.

10.1.3.4 In addition to the above, you can also raise any problem through the formal part of our Grievance process. You can find the formal procedure in our Grievance Policy. It's your decision whether or not to start the formal grievance process. Initially you will need to write to your manager or your manager's manager. Then we will arrange to speak with you to ensure that we understand the situation before carrying out a full investigation.

10.1.4 **Protection and support for those involved.**

10.1.4.1 Anyone who makes a complaint or who participates in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. If you ever feel you've suffered adverse treatment or victimisation because you spoke up, you should raise this as a new concern using one of the formal routes detailed in section 4.2.

10.1.4.2 "Good faith" does not mean that a reported concern must be correct, but it does require that a Team Member be honest and truthful when reporting a concern. True North aims to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.1.4.3 Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the conduct policy and employment/labour laws.

10.1.4.4 In addition to supporting you to raise your concerns so that they can be fully investigated, we also offer support to anyone affected or accused of discrimination, harassment or bullying. For details, contact HR.

**11. Consequences of Breaching this Policy**

11.1 Anyone found to have acted in a way that contravenes this policy, even if done in a jest with no intention to offend, may be subject to a disciplinary procedure in accordance with the conduct policy and employment/labour law, which may result in the termination of your contract with True North.

**12. Reporting Breaches or Concerns**

12.1 If you witness discrimination, harassment or bullying of another True North employee, applicant, contractor or client, or suspect a breach of this policy, we expect you to report this by contacting your line manager, another local leader or the HR team. You can also report issues through the confidential helpline. For more information on the available reporting channels go to Ethics Point – Comcast Corporation or our Whistleblowing Policy.

12.2 True North strictly prohibits retaliation against any employee who makes a good faith report of an actual or suspected breach of this Policy even if the concern is eventually unsubstantiated. See section 4.3 for more details.

- 12.3 Nothing in this Policy or any other True North policy limits your ability to communicate with or provide information to any regulatory body, governmental agency or commission, including the U.K. Financial Conduct Authority, or local equivalent regarding possible legal breaches without disclosure to True North, as protected under international whistleblower laws.
- 12.4 We expect you to report any suspected or actual breaches of this Policy by contacting your line manager, the HR team or the confidential helpline on 0808 234 9777 or Web Portal (Ethics Point – Comcast Corporation). For more information on the available reporting channels, please refer to the Whistleblowing Policy.
- 12.5 True North strictly prohibits retaliation against any employee who makes a good faith report of an actual or suspected breach of this Policy even if the concern is eventually unsubstantiated.
- 12.6 Nothing in this Policy or any other True North policy limits your ability to communicate with or provide information to any regulatory body, governmental agency or commission, including the U.K. Financial Conduct Authority or local equivalent regarding possible legal breaches without disclosure to True North, as protected under international whistleblower laws.

### **13. Changes to this Policy**

- 13.1 True North makes sure its policies are up to date and right for everyone at True North. This Policy may change from time to time with or without notice.
- 13.2 The latest version of this Policy will be published, and it is your responsibility to read, understand and comply with the requirements, procedures and other matters set out in the latest version of this Policy at all times.

### **14. Monitoring and Review of this Policy**

- 14.1 The Policy Owner is responsible for reviewing and maintaining this Policy from time to time and for ensuring that appropriate governance and oversight controls and procedures are designed, implemented and monitored with local business owners, training is provided, and for management reporting as appropriate to mitigate the risks covered by this Policy.
- 14.2 This Policy is non-contractual, and it does not form part of your terms and conditions with True North.

### **15. Point(s) of Contact**

- 15.1 For enquiries about this Policy please contact your line manager and/or HR.