

# Chubb Bullying and Harassment Policy

**Applicability:** All UK employees of Chubb

**Effective Date:** July 2025



## Policy Statement

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All employees have the right to be treated with consideration, dignity and respect and have the right to complain if they feel that they are the subject of any form of harassment or bullying. Bullying and harassment will not be tolerated by Chubb in any form. We recognise that harassment and bullying can occur both in and outside the workplace, such as on business trips or at work-related events or social functions, including after work drinks and Christmas parties. It can also occur on social media, business and personal devices. Harassment and bullying may include job applicants, former employees, contract workers and individuals employed by third parties, including individuals employed by brokers and other companies providing services to Chubb. This policy applies to all of those situations. The content of this policy is intended to complement the Chubb Code of Conduct

The terms of this policy are not contractual and can be amended by Chubb from time to time. Where time limits are referred to, they are indicative only, and may be varied if not practicable, or by consent.

## Definitions

**Harassment** is defined as unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating and intimidating, hostile, degrading, humiliating or offensive environment for that individual. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

**Bullying** is defined as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. 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.

**Protected Characteristics** are set out in the Equality Act 2010 as follows: age; disability; sex; marriage and civil partnership; gender reassignment; pregnancy and maternity; race; colour; nationality; ethnic or national origin; religion or belief; and sexual orientation. Bullying and harassment is unacceptable even if it does not fall within any of these categories.

Examples of behaviour which could constitute bullying or harassment include:

- Spreading malicious rumours or making false allegations against others
- Humiliating or ridiculing others about their work
- Ignoring the views of others
- Spontaneous rages, often over trivial matters
- Engaging in excessive monitoring of the work of others or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, the display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- Making threats or comments about job security without foundation
- Setting unreasonable tasks or deadlines

- Preventing individuals progressing by intentionally blocking promotion or training opportunities
- Patronising remarks
- Shunning or excluding people from normal workplace conversation or social events
- Being condescending or belittling about the way people speak or dress.
- Unjustified criticism of work performance
- Unfair allocation of work and responsibilities
- Insulting, threatening or abusive language or behaviour
- Physical abuse or intimidation
- Banter
- Posts or contact on social media
- Facial expressions
- Mimicry
- Jokes or pranks
- Physical gestures

Bullying and harassment may not be face to face. They can also take place in emails, social media and by phone.

Any of the examples listed above could be on the basis of a person's protected characteristic or because of their association with a person who has a protected characteristic, or because they are wrongly perceived to have one, or are treated as if they do.

Someone who is bullied or harassed may feel anxious and humiliated. They may feel anger or frustration at not being able to cope and may try to retaliate in some way. Other people may become frightened or de-motivated. Stress, loss of self-confidence and self-esteem caused by harassment or bullying can lead to job insecurity, sickness, absence from work and may lead to employees resigning from their job. Job performance can also be impacted and relations in the workplace may deteriorate.

### What is not bullying or harassment

Legitimate and constructive criticism of an employee's performance or behaviour at work, which is delivered in an appropriate manner, is not bullying or harassment. An occasional raised voice, difference of opinion or argument may not constitute bullying. However, it is not acceptable to condone bullying behaviour under the guise of a particular management style. An effective manager achieves results whilst ensuring that employees are treated with dignity and respect.

### Types of harassment

#### Sexual Harassment

Unwelcome comments about dress or appearance unrelated to an individual's job; the display of sexually suggestive pictures or objects including posters; unwanted physical contact; sex-based jibes, language or abuse; undue pressure for social contact outside of work or demands for sexual favours; sexual gestures; intrusive questions about a person's private or sex life or a person discussing their own sex life; sexual posts or contact on social media; spreading sexual rumours about a person; sending sexually explicit emails or text messages

#### Racial Harassment

Includes a wide range of unacceptable and often unlawful behaviour including racist language and physical harassment. Also more subtle actions such as intrusive questioning about a person's racial or ethnic origin, culture or religion or subjecting this

to mockery; racist 'jokes', banter and insults; and displaying or articulating racially offensive material, including racist graffiti or imagery.

### Age Harassment

Ridiculing or demeaning behaviour or exclusion directed at people because of their actual or apparent age

### Disability related harassment

Undignified treatment or ridicule or exclusion of people because of their disability, vulnerability, or actual or perceived reduced independence.

### Harassment on the grounds of Sexual Orientation

Unwanted behaviour based on known or presumed sexual orientation. Includes name-calling, stereotyping, assault, verbal abuse, actual or threatened unwanted disclosure of sexuality, derogatory comments, excluding same-sex partners from social events, and intrusive questioning about a person's domestic circumstances.

Treating somebody less favourably where they have either rejected or submitted to unwanted conduct is also a form of harassment.

## Procedure – What to do if you are feeling bullied or harassed

### Informal stage

Wherever possible, an employee who feels that they have been harassed or bullied should consider asking the other party to stop and make it clear that their behaviour is unwelcome. Those experiencing harassment or bullying are advised to discuss their concerns with their manager or HR Business Partner before approaching the other party about their conduct. Alternatively, an initial approach may be made by the manager or HR Business Partner. Informal action may include the line manager confirming in writing to the other party, the standards of behaviour required and the possible consequences of failure to achieve those standards.

If an informal approach is not appropriate for any reason or the unwanted conduct continues, the formal procedure should be followed.

As a general principle, the decision whether to progress a complaint is a matter for the employee. However, Chubb has a duty to protect all staff and may pursue the matter independently if, in all the circumstances, Chubb considers it appropriate to do so.

### Formal stage

The formal stage of the procedure can be used where:

- The employee requests it, feeling unable to raise the complaint through the informal procedure
- The informal procedure has failed or is not appropriate
- Harassment or bullying is persistent
- A single instance of harassment or bullying is serious enough to warrant it

Where an employee wishes to pursue a formal complaint of harassment, they should register the complaint in writing to their line manager setting out the specifics of the complaint.

In cases where the person causing the alleged harassment/bullying is the line manager, the employee may register the complaint to the next more senior manager or to their HR Business Partner.

## Investigation

Chubb will investigate complaints in a timely, respectful and confidential matter. Investigations will be conducted by an appropriate person, taking into account the sensitivities of the case. Individuals not involved in the complaint or the investigation should not be told about it.

Chubb will invite the employee who has made the complaint to an investigatory meeting. The employee is entitled to be accompanied by a work colleague or trade union representative at the meeting. The employee should inform the HR Business Partner or person who has arranged the meeting who their companion will be in advance of the meeting. A colleague who has agreed to act as companion for someone is entitled to take reasonable paid time off to fulfil that responsibility.

If the employee's companion cannot attend on the date proposed, the employee may suggest alternative date and time, provided it is reasonable and not more than five working days after the date proposed by the manager.

Following the meeting with the employee, the investigating manager will normally investigate further, unless an alternative resolution such as mediation is agreed.

## Witnesses

Witnesses to any incidents may also be interviewed by Chubb as part of the investigation. Alternatively, written statements may be given. All interviews will be conducted confidentially. Any interviews/statements must be conducted/gathered within a reasonable timeframe.

Witnesses will not be subject to any detriment for fulfilling this role. Any breaches of confidentiality or acts of detriment against either witnesses or the individual raising the complaint may be subject to disciplinary action.

## Meeting with the person against whom the complaint is being made

The person against whom the complaint is being made will be advised of the allegation during the investigation and will have the opportunity to respond to the allegation. Chubb will invite them to a meeting to discuss the complaint and they will be given the opportunity to be accompanied by a work colleague or a trade union representative.

## Other considerations during the investigation

Depending on the circumstances, consideration should be given to the following:

- Separating the employee who made the complaint from the person against whom the complaint is being made. In such cases, the alleged harasser should normally be moved unless the complainant's preference is to be moved.
- Increasing levels of supervision
- Modifying work procedures to minimise interactions between the parties

In more serious cases, the employee who is alleged to have caused the bullying or harassment may be suspended with pay, in line with Chubb's Disciplinary Policy. Suspension is a neutral act, does not prejudice the result of the investigation and is intended to protect the interests of all parties during the investigation process.

During the investigation, confidentiality should be maintained as far as is compatible with a thorough investigation and the effective handling of each case.

Chubb will keep both employees informed of progress during the investigation.

## Outcome of investigation

Once the investigation has been completed, a decision should be made on an appropriate outcome. This could include offering mediation or a supported conversation between the parties and considering any corrective action that may be required e.g. coaching or training. Chubb may also recommend whether it is appropriate to consider the alleged behaviour of the employee against whom the complaint was made at a hearing under the Disciplinary Policy. Alternatively, Chubb may decide that the complaint is not upheld and that no further action is required.

Both the employee who made the complaint and the person against whom the complaint was made will be invited to separate meetings to discuss the findings and what, if any, action or steps are being recommended. These individuals may be accompanied at the meeting by a colleague or trade union representative.

The outcome will also be confirmed in writing to both parties.

### Disciplinary Action

If Chubb considers that harassment or bullying has occurred, prompt action will be taken to address it.

Where the harasser or bully is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under the Disciplinary Policy. Any abuse of power over a more junior colleague will be taken into account in deciding the outcome. If the harasser or bully is a third party such as a supplier or other visitor, Chubb will consider what action would be appropriate to deal with the problem.

Malicious or vindictive allegations of harassment and bullying may be treated as a disciplinary offence and disciplinary action may be taken where appropriate and may include dismissal. Investigations will normally consider whether complaints have been made in good faith.

### Separating Employees

Whether or not the complaint is upheld, Chubb will consider how best to manage any ongoing working relationship between the complainant and the person concerned.

### Timescales

Complaints regarding bullying or harassment should be made as soon as possible following the incident taking place or the manifestation of what the employee considers to be an inappropriate pattern of behaviour. This is to ensure that the investigation can take place while events are still easy for witnesses to re-call and the issues can be addressed as soon as possible.

If possible, investigations should be concluded as quickly as possible. To assist with this, employees should make time in their diaries to attend meetings.

### Appeal

The employee who made the complaint has the right to appeal against the outcome of the investigation if they are dissatisfied with it.

Any appeal should be made in writing setting out the grounds of the appeal, within 5 working days of receiving the written notification of the outcome. The appeal can be on the following grounds:

- That they do not agree that the allegation has or has not been upheld
- Process e.g. that the procedure has not been followed or was biased
- If new evidence has come to light since the conclusion of the investigation

The employee who made the complaint may not appeal the recommendations of the investigation. For example, if a period of retraining or mediation is recommended as opposed to disciplinary action, this cannot be appealed.

An appeal will normally be a review of the areas of the outcome that the employee who made the complaint was dissatisfied with rather than a rehearing of the original investigation. It is therefore acceptable for Chubb to restrict discussion to those specific areas rather than rehear the whole complaint.

Where practical, the appeal will be heard by a more senior manager than the manager who heard the original complaint or by a manager of the same seniority in a different part of the business, together with a member of the HR team. Neither person should have previously been involved in the complaint.

The decision made at the appeal stage is final.



### False Accusations/Malicious Complaints

Disciplinary action may be taken in any cases where a complaint is made frivolously, maliciously or for personal gain. This will be the decision of the investigating manager and in such cases the company may not be able to preserve the confidentiality of the employee who made the complaint.

It should not be assumed that a lack of evidence for an allegation means the allegation was not made in good faith or is not true and in these circumstances, no action will be taken against the employee.

### Confidentiality and Record-Keeping

All complaints of bullying and harassment will be handled sensitively and confidentially. The outcome of any complaint will be treated as confidential, as will all meetings, documents and other conversations relating to any investigation.

If it is recommended that the matter should be dealt with under the Disciplinary Policy then the employee who made the complaint will be informed of this, however, they will not be informed of the outcome of any disciplinary action.

Information about a complaint by or about an employee may be placed on the employee's HR file, along with a record of the outcome and of any notes or other documents compiled during the process.

### Harassment by a Non-Employee

If an allegation of harassment involves a non-employee, the principles of this policy will apply in terms of addressing the complaint. This includes attempting to resolve the matter informally if appropriate. Any employee who feels that they have been harassed by someone who is not an employee of Chubb e.g. a consultant or agency worker, should report the matter to their line manager as soon as possible. If the alleged bully or harasser is working at Chubb, their line manager should be informed.

Where a case cannot be resolved informally or the incident is of a more serious nature, the matter should be referred to a more senior manager, who may choose to take any of the following steps:

- Reviewing or terminating a contract with an external organisation
- Writing to the individual to inform them that their behaviour is not acceptable and will not be tolerated.
- Exclusion from Chubb's premises
- A formal request for investigation by the individual's employer

Chubb will consider what action may be appropriate to protect the complainant and anyone involved, pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, Chubb will attempt to discuss the matter with the third party.

### Harassment of a Non-Employee

Should someone who is not employed by Chubb feel that a Chubb employee has harassed them, they should report the incident to a senior manager so that the matter can be investigated.

Chubb will consider what action may be appropriate to protect the complainant and anyone involved, pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, Chubb will attempt to discuss the matter with the third party.

### Support for Employees



Employees can contact the Employee Assistance programme (EAP) for emotional or practical support on 0800 028 0199. More details can be found in Benefits Place.

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Allegations that anyone has retaliated against or victimised someone in this way may be subject to disciplinary action under the Disciplinary Policy. Examples of retaliation and victimisation can include being rejected for promotion, being denied the opportunity to attend external events or undertake training, or not being given a discretionary bonus or performance-related award.

Support can also be provided from HR at both the informal and formal stages of the policy for the employee who feels bullied or harassed, including advising the employee of their options to stop the behaviour, acting as a link with management to raise the issue and accompanying the employee to informal and formal meetings as appropriate.

The same provision of support is available for the employee accused of bullying or harassment.

This policy will be reviewed periodically by Human Resources. Chubb reserves the right to amend this policy at any time.