

# Prevention of Sexual Harassment Policy

(United Kingdom)

---

The best people make the best Company, and our policies and guidance are here to support you through the key moments that matter in your work life and to help make GXO a great place to work.

## CONTENTS

- [Purpose](#)
- [Scope](#)
- [Responsibilities](#)
  - [Colleagues](#)
  - [Line Manager](#)
  - [Human Resources](#)
- [Definitions](#)
  - [Sexual Harassment](#)
  - [Victimisation](#)
  - [Third-party Sexual Harassment](#)
- [The Procedure](#)
  - [Informal Steps](#)
  - [Formal Steps](#)
  - [Witnesses](#)
  - [Investigations](#)
  - [Outcome of the Investigation](#)
  - [Appeals](#)
- [Protection and Support for Individuals](#)
- [Confidentiality and Record Keeping](#)
- [Policy Review](#)

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

**OTHER RELATED POLICIES**

- Disciplinary Policy
- GXO Code of Business Ethics
- UK Public Interest Disclosure (Whistleblowing) Policy
- Business Ethics Policy - GDPR Privacy Policy
- Business Ethics Policy-Zero tolerance discrimination, harassment, and retaliation

**USEFUL CONTACTS**

HR People Services UK - hrsupportteamuk@gxo.com, 08442 577 577

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

## 1. PURPOSE

This policy is designed to set out the complaints procedure for any sexual harassment and/or victimisation that may occur in the workplace and provide a framework for managers and the Human Resources (HR) team to deal with any such complaints.

This policy is developed in compliance with The Worker Protection (Amendment of Equality Act) Act 2023

Should you have any questions about this policy, please speak to your line manager, the HR team or the GXO Ethics & Compliance team (ethics@gxo.com).

This policy does not form part of any contract of employment, and it may be amended at any time

## 2. SCOPE

This policy is supplemental to the GXO Logistics, Inc. Code of Business Ethics and its associated policies, including the “Business Ethics Policy – Zero tolerance discrimination, harassment and retaliation policy” (the “**Global Policies**”).

It applies to all colleagues who are employed by or work with GXO’s subsidiaries, divisions and other operating entities in the UK and all officers, consultants, contractors, casual workers, agency workers, apprentices, volunteers and interns who are engaged by or work with those UK subsidiaries, divisions or operating entities. The obligations and duties set out in this policy also extend to UK job applicants and former employees of GXO’s subsidiaries, divisions and other operating entities in the UK.

All directors, officers, employees and third parties acting on behalf of GXO Logistics, Inc., (including all of its subsidiaries, divisions and other operating entities) and all directors, officers, employees and third parties acting on our behalf, are subject to and responsible for complying with the requirements of this policy in relation to GXO’s operations in the UK

To the extent that that this Policy differs from or has more stringent requirements than the Global Policies, then this Policy and the requirements of the Worker Protection (Amendment of Equality Act) Act 2023 will prevail.

## 3. RESPONSIBILITIES

### 3.1 Colleagues

- Understanding and following this policy.
- Seeking clarification from their line manager if there are aspects of this policy which they do not understand.

### 3.2 Line Managers

- Understanding and following this policy.
- Treating all individuals in a fair and consistent manner.
- Managing complaints and investigations without unreasonable delay.
- Seeking HR advice where necessary.
- Maintaining confidentiality and data protection.

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

### 3.3 Human Resources

- Shall have day-to-day responsibility for this policy and any questions or suggestions for change about this policy should be referred to HR in the first instance.
- Ensuring that this policy is applied consistently throughout GXO
- Providing advice and coaching to Line Managers on the implementation and facilitation of this policy.
- Maintaining confidentiality and data protection.
- Reviewing this policy annually, monitoring its effectiveness and implementing any changes that may be required.

## 4. DEFINITIONS

### 4.1 Sexual Harassment

Sexual harassment is any unwanted physical, verbal or non-verbal 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 for them. A single incident can amount to sexual harassment and a person may be sexually harassed even if they were not the intended target.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex, in the past.

For example, sexual harassment may include:

- Unwelcome or unsolicited sexual advances (which the perpetrator may perceive as harmless).
- Requests for sexual favours or conversations regarding sexual activities.
- Sending or displaying material that is pornographic or that some people may find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet).
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favours;
- Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing
- Offensive emails, text messages or social media content.; or
- Any other conduct or advances or requests that have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

A person may be sexually harassed even if they were not the intended target. For example, a person may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

### 4.2. Victimisation

Victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, any of the following protected acts:

- Bringing proceedings under the Equality Act 2010;
- Giving evidence or information in connection with proceedings under the Equality Act 2010;
- Doing any other thing for the purposes of or in connection with the Equality Act 2010; or
- Alleging that a person has contravened the Equality Act 2010.

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

For example, victimisation in the context of sexual harassment may include:

- Denying someone an opportunity because it is suspected that they intend to make a complaint or have made a complaint about sexual harassment;
- Subjecting someone to detriment because they have supported another individual who has made a complaint about sexual harassment;
- Making employment decisions based on someone's submission or rejection of sexual harassment conduct;
- Excluding someone because they have raised a grievance about sexual harassment;
- Failing to promote someone because they accompanied another staff member to a grievance meeting; or
- Dismissing someone because they gave evidence on behalf of another staff member at an employment tribunal hearing.

Sexual harassment and victimisation are unlawful and will not be tolerated. They may lead to disciplinary action up to and including dismissal if they are committed:

- In a work situation;
- During any situation related to work e.g. a social event;
- Against someone connected to GXO outside of a work situation (e.g. on social media); or
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

If sexual harassment or victimisation of an individual occurs, GXO will take steps to remedy any complaints and to prevent it happening again. These may include updating relevant policies, providing further staff training and taking disciplinary action against the perpetrator.

GXO will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take.

### **4.3 Third-party Sexual Harassment**

Third-party sexual harassment occurs where someone is sexually harassed by someone who does not work for GXO, but with whom they have come into contact during the course of working for GXO. For example, third-party sexual harassment may include unwelcome sexual conduct from a client, customer or supplier visiting GXO's site, or where someone is visiting a client, customer or supplier's premises in the course of their employment.

Third-party sexual harassment can result in legal liability and will not be tolerated. Although an individual cannot bring a claim for third-party harassment alone, it can still result in legal liability for GXO when raised in other types of claims. Everyone is encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy.

Any sexual harassment by a colleague against a third party may lead to disciplinary action up to and including dismissal.

GXO will take active steps to try to prevent third-party sexual harassment by third parties and GXO will take steps to remedy any complaints and to prevent it happening again. These may include putting up signs in the workplace regarding unacceptable behaviour, warning the perpetrator about their behaviour, banning the perpetrator from GXO's premises and/or reporting any criminal acts to the police.

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

## 5. THE PROCEDURE

### 5.1 Informal Steps

If you are being sexually harassed or victimised, consider whether you feel able to raise the problem informally with the individual(s) responsible. You should consider explaining to them that their behaviour is not welcome and how it makes you feel. If this is not possible, you should speak to your line manager or the HR team, who can assist you with resolving the issue. If informal action does not resolve the issue, you should follow the formal complaints procedure set out below.

Supervisors/managers must immediately refer all complaints involving harassment to HR (even where the site does not have a dedicated HR team, in which case it should be referred to HR at a different site). Failure to do so may result in appropriate disciplinary action. Supervisors/managers should not initiate an investigation unless advised to do so by HR.

### 5.2 Formal Steps

If you wish to make a formal complaint about sexual harassment or victimisation, you should submit it in writing to your line manager or the HR team. If the matter concerns your line manager, you should submit it to HR.

Your written complaint should provide as much detail as possible and set out:

- Full details of the conduct in question, including the name of the alleged perpetrator;
- The nature of the sexual harassment/victimisation;
- The date(s) and time(s) at which the harassment/victimisation occurred;
- The details of any witnesses; and
- Any action that has been taken so far to attempt to stop the harassment/victimisation from occurring, including any informal action taken.

If you do not feel comfortable in bringing your complaint to your line manager or HR you may make a report to the Ethics & Compliance team ([ethics@gxo.com](mailto:ethics@gxo.com)) or you may make a complaint through GXO's reporting hotline, [gxo.ethicspoint.com](http://gxo.ethicspoint.com) or by phone on 0800-909-3695. Any complaint made via these channels will be managed in accordance with the steps outlined below.

You may report concerns anonymously if you choose to do so; however, identifying yourself better enables GXO to investigate your concerns and provide you with appropriate follow-up. All reports are handled as confidentially as possible.

As a general principle, the decision whether to progress a formal complaint is up to you. However, GXO has a duty to protect all colleagues and may pursue the complaint independently if, in all the circumstances, it is considered appropriate to do so.

### 5.3 Witnesses

Witnesses to sexual harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include intervening where you feel able to do so, supporting an individual to report it or reporting it on their behalf and/or co-operating in any investigation.

All witnesses will be provided with appropriate support and will be protected from victimisation. Witnesses should be aware that any complaints of sexual harassment or victimisation will be dealt with by GXO confidentially, and any breach of confidentiality may be dealt with under the Disciplinary Policy

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

## 5.4 Investigations

It is important that an investigation is conducted without unreasonable delay and in a respectful and confidential manner. The amount of investigation required will depend on the nature of the allegations and the circumstances of the particular case.

GXO will arrange a meeting with you, usually within 5 working days of receiving your complaint, so that you can give your account of events. It may be necessary to interview witnesses to any of the incidents mentioned in your complaint.

Where the complaint is about a colleague, GXO may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if appropriate. GXO will also consider what additional action may be appropriate to protect you and other individuals pending the outcome of the investigation. The investigator will also meet with the alleged perpetrator to hear their account of events. They have a right to be told the details of the allegations against them, so that they can properly respond.

Where the complaint is about someone other than a colleague, such as a third party, GXO will consider what action may be appropriate to protect you and other individuals pending the outcome of the investigation, bearing in mind the reasonable needs of GXO and the rights of that individual. Where appropriate, GXO will attempt to discuss the matter with the third party.

At the end of the investigation, the investigator will submit a report to a senior manager and HR. The senior manager/HR will arrange a meeting with you, usually within 5 working days] of receiving the report, in order to discuss the outcome and what action, if any, should be taken. A copy of the report and the findings will be given to you and to the alleged perpetrator.

Whilst it is not a statutory right, GXO will allow all colleagues (including the alleged perpetrator) to be accompanied during any investigation meetings by a colleague or a trade union representative of their choice, who must respect the confidentiality of the investigation.

## 5.5 Outcome of the Investigations

If the senior manager and HR considers that there is a case to answer and the alleged perpetrator is a colleague, the matter may be dealt with as a case of possible misconduct or gross misconduct under GXO's Disciplinary Policy or as a protected disclosure under the Whistleblowing Policy. GXO's investigation into your complaint or provision of the outcome may be put on hold pending the outcome of any disciplinary or whistleblowing process.

Where the disciplinary outcome is that sexual harassment or victimisation has occurred, prompt action will be taken to address it. GXO will also consider what additional measures need to be taken to prevent future sexual harassment or victimisation of colleagues. If the alleged perpetrator is a third party, GXO will consider what action would be appropriate to deal with the problem and prevent a reoccurrence.

Whether or not your complaint is upheld, GXO will consider how best to manage the ongoing working relationship between you and the alleged perpetrator. It may be appropriate to arrange some form of mediation or counselling, or to change the duties, working location or reporting lines of one or both parties.

Any colleague who deliberately provides false information in bad faith, or who otherwise acts in bad faith as part of the investigation process, may be subject to disciplinary action. However, you will not be disciplined or treated detrimentally simply because you have brought a complaint or it has not been upheld, or you have come forward as a witness to a complaint.

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025

## 5.6 Appeals

If you are not satisfied with the outcome of a complaint you may appeal in writing to the person outlined in your outcome letter] stating your full grounds of appeal, within 5 days of the date on which the decision was provided to you.

GXO will hold an appeal meeting with you, normally within 10 working days of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a manager who has not been previously involved in the case and who is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. All colleagues have the right to bring a colleague or trade union representative to the meeting.

GXO will confirm its final decision in writing, usually within 10 working days of the appeal hearing. This will be the end of the complaints procedure and there is no further right of appeal.

## 6. PROTECTION AND SUPPORT FOR INDIVIDUALS

Individuals who make complaints, report that they have witnessed an incident, or who participate in good faith in any investigation must not suffer any form of detriment, retaliation or victimisation as a result. GXO policies prohibit retaliation against any colleague for reporting a potential violation of this policy. Any report of retaliatory conduct will be promptly investigated, preserving confidentiality to the extent possible. If a report of retaliation is substantiated appropriate disciplinary action will be taken. If you believe you have suffered any such treatment, you should raise this in accordance with this policy.

GXO will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation it receives to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

GXO provides access to its Employee Assistance Programme for all affected colleagues which can be accessed by calling 0800 389 0285 for confidential, 24/7 support or by accessing our dedicated online portal - <https://wisdom.healthassured.org/login>

Support and guidance can also be obtained from the following external services:

- The Equality Advisory and Support Service ([www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)).
- Protect ([www.protect-advice.org.uk](http://www.protect-advice.org.uk)).
- Victim support ([www.victimsupport.org.uk](http://www.victimsupport.org.uk)).
- Rape crisis ([www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)).
- Rights of women (England and Wales) ([www.rightsofwomen.org.uk](http://www.rightsofwomen.org.uk)).
- Scottish Women's Rights Centre (Scotland) ([www.scottishwomensrightscentre.org.uk](http://www.scottishwomensrightscentre.org.uk)).

Where 2 or more individuals each raises a grievance about their personal treatment which has issues in common with any of the other grievances raised at the same time then it may be appropriate, with consent of all of the individuals concerned for the grievances to be heard collectively (i.e. in a single meeting between an appropriate line manager and a nominated union representative agreed by the group of individuals involved). In that event the grievance will be heard at Stage 2 of this procedure.

## 7. CONFIDENTIALITY AND RECORD KEEPING

Confidentiality is an important part of this policy. Details of the investigation and the names of the individual making the complaint and the alleged perpetrator must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under GXO's Disciplinary Policy.

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025



Information about a complaint by or about a colleague may be placed on their personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with GXO's Data Protection Policy.

## **8. POLICY REVIEW**

This policy has been produced to help ensure that all colleagues know what is expected of them, and that all colleagues are treated in a fair and consistent manner. If you have a question about this policy, please speak to your line manager or a member of the HR team.

The Company reserves the right to review and amend this policy from time to time to include any changes in legislation and good practice. Employees will be notified of amendments by way of written notice and/or electronic notice (which may be by e-mail or by notice on the staff intranet).

<b>POLICY NAME</b>	Prevention of Sexual Harassment Policy (United Kingdom)
<b>POLICY OWNER</b>	HR People Services UK
<b>LAST UPDATED</b>	December 2024
<b>NEXT REVISION</b>	December 2025