Sexual Harassment Policy

All contractors, self-employed individuals, consultants and any other persons engaged to provide services to ATA Logistics Ltd are entitled to be treated with dignity and respect whilst undertaking work on behalf of the Company. This includes freedom from sexual harassment, feeling safe and supported, and having access to appropriate reporting channels should such behaviour arise.

The Company operates a zero-tolerance approach to all forms of sexual harassment and is committed to ensuring that the working environment is safe, professional and inclusive for everyone working with or on behalf of the organisation. This includes employees, workers, agency workers, volunteers, clients, suppliers and independent contractors.

This policy forms part of the standards expected of all contractors engaged by ATA Logistics Ltd and compliance with it forms part of the contractual terms governing the provision of services.

Legal Framework

Under the Equality Act 2010, protection from discrimination and harassment can extend beyond employees to include contractors and certain self-employed individuals where they are engaged to personally provide services.

Contractors must also comply with the Company's policies relating to dignity at work, equality, diversity and anti-harassment when undertaking work on behalf of the Company.

This policy applies to behaviour occurring:
• During work activities carried out on behalf of the Company
• At Company sites or client locations
• During work-related travel, meetings or events
• At work-related social events
• During online communications connected with work
• Outside work where conduct may impact professional relationships or the Company's reputation

Failure to meet these standards may result in termination of contracts, removal from assignments, or other appropriate action.

All contractors are expected to:

- Maintain professional behaviour at all times;
- Treat everyone with dignity and respect;

Sexual Harassment Policy

- Not engage in any form of harassment, discrimination or victimisation;
- Comply with Company policies when working on Company premises or representing the Company;
- Report any incidents of sexual harassment they experience or witness.

Definition of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment also includes treating someone less favourably because they have either submitted to or refused unwanted sexual conduct.

Sexual harassment may include (but is not limited to):
• Sexual comments or jokes
• Displaying sexually explicit images
• Suggestive looks, staring or leering
• Sexual advances or propositions
• Offering work-related benefits in exchange for sexual favours
• Sexual gestures
• Intrusive questions about a person’s private life
• Sexual messages or posts online
• Spreading sexual rumours
• Sending sexually explicit messages
• Unwanted physical contact such as touching, hugging or kissing

Third-Party Sexual Harassment

Third-party sexual harassment occurs where a contractor is subjected to harassment by someone they encounter through their work such as clients, customers, suppliers, visitors, other contractors or members of the public.

The Company will not tolerate sexual harassment of contractors by third parties and expects contractors not to engage in sexual harassment towards any third party.

Possible actions may include investigation, removal from assignment or termination of business relationships where appropriate.

Sexual Harassment Policy

Reporting Concerns

Contractors who experience or witness sexual harassment are encouraged to report concerns as soon as possible.

Reports should be made to the Company contact via the designated reporting email (for example: yourvoice@itbholdings.co.uk).

All reports will be taken seriously.

Investigation Process

All complaints will be handled sensitively, fairly and as confidentially as possible.

Possible outcomes may include:
- Removal from assignment
- Termination of contract
- Restriction from future work
- Reporting serious matters to relevant authorities where appropriate

Deliberately false or malicious complaints may also result in action.

Responsibilities of Contractors

All contractors must:
- Comply with this policy
- Complete any required training where applicable
- Cooperate with investigations
- Maintain professional conduct when representing the Company

Failure to comply may result in termination of the contractual relationship.

Policy Review

This policy will be reviewed periodically to ensure compliance with current legislation and best practice.