

Dated 14<sup>th</sup> May 2020



THE WORLD WATCHES  
ANTI-HARASSMENT AND BULLYING POLICY

### Introduction

This anti-harassment and bullying policy sets out the commitment of Argonon Ltd and all subsidiary companies (collectively, “**Argonon**”) to ensuring all employees, directors, officers, consultants, contractors, interns, crew, artists, agency workers and any others engaged, contracted or employed by or with Argonon and third parties such as visitors to Argonon’s premises, clients or suppliers (collectively, the “**Workers**”) are treated equally, with dignity and respect and experience a safe working environment. This policy applies to all Workers based in the UK and those Workers based in other territories but engaged/employed by Argonon to work and/or provide services within the UK. All workers based in the USA and those workers based in territories other than the USA but engaged/employed by Argonon to work and/or provide services within the USA shall abide by the USA AntiHarassment and Bullying Policy which can found on Argonon’s intranet or in hard copy by request to HR. These policies will be applied rigorously.

Argonon is committed to creating a working environment of mutual trust and respect with support for cultural diversity and an open and honest team. Co-operation and an environment free of intimidation, fear and harassment form the basics of our corporate culture. Argonon management will support this by acting as role models in their business conduct and leadership style.

This policy is non-contractual, and it does not form part of Workers’ terms and conditions with Argonon. Argonon reserves the right to amend this policy at any time.

Workers should study this policy and make sure to understand it and how it relates to the respective Worker’s role and position within Argonon.

### Principles

The British Film Institute (“**BFI**”) have created a set of principles to tackle and prevent bullying and harassment in the screen industries (*see full guidance in the BFI link below*). These have been adopted for use within Argonon as follows:

1. Argonon is responsible for creating and maintaining an inclusive workplace that is positive and supportive.
2. Argonon recognises that harassment may be unlawful under the *Equality Act 2010*.
3. Argonon accepts its responsibilities under the *Health and Safety at Work Act 1974*.
4. Argonon does not tolerate bullying and harassment, including sexual harassment, and will ensure that processes are in place for the reporting and investigation of these serious issues.
5. Argonon recognises that bullying and harassment can have significant adverse impacts on the productivity, long-term health and well-being of affected people and we will work to eradicate it. This will mean providing adequate protection for complainants and victims, and, where bullying or harassment is found to have occurred, taking appropriate action against bullies or harassers.
6. Argonon values inclusivity, appreciate difference, welcome learning from others, and consider people equal without prejudice or favour. Argonon builds relationships based on mutual respect.

Everyone at Argonon will all work to give and receive feedback in a constructive way in order to improve creativity and productivity.

7. Argonon understands that reporting bullying or harassment can be intimidating. Argonon will respect confidentiality where possible and aim to make the process of reporting clear and straightforward. If anyone comes forward to report behaviour which might amount to bullying or harassment, Argonon will endeavour to investigate objectively. Individuals who have made complaints of bullying and harassment or participate in good faith in any investigation should not suffer any form of reprisal or victimisation as a result.
8. Everyone at Argonon will respect each other's dignity, regardless of the seniority of their role in the Argonon organisation.

### Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, undermined, humiliated, denigrated 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 take the form of physical, verbal and non-verbal conduct.

Bullying may include, by way of example:

- physical or psychological threats;
- overbearing and intimidating levels of supervision; and
- inappropriate derogatory remarks about someone's performance.

Legitimate, reasonable and constructive criticism of a Worker's performance or behaviour, or reasonable instructions given to Workers will not amount to bullying on their own.

### Harassment

Harassment is any unwanted physical, verbal or non-verbal conduct 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 harassment. Unlawful harassment may involve conduct of a sexual nature or it may be related to race, nationality, marital or civil partner status, pregnancy or maternity, disability, gender reassignment, religion or belief, ethnic or national origin, sexual orientation or age. Sexual harassment does not always have to be specifically about sexual behaviour or directed at a specific person. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may take many forms and include:

- conduct which is unwanted by the recipient and perceived as hostile or threatening;
- conduct which gives rise to a hostile or threatening work environment; and
- conduct which creates an atmosphere in which it is feared that rejection or submission will be used as a basis for decisions which have an impact on the recipient at work.

The following are examples of types of behaviour which may amount to harassment:

- physical or sexual assault;
- requests for sexual favours in return for career advancement;
- unnecessary physical contact;
- negative comments about an individual's gender or gender as a group;
- exclusion from social networks and activities or other forms of isolation;
- compromising suggestions or invitations;
- suggestive remarks or looks;

- display of offensive materials, including on a computer screen;
- tasteless jokes or verbal abuse, including but not limited to any sent by email;
- offensive remarks or ridicule; and
- dealing inappropriately or inadequately with complaints of harassment.

#### How will Workers be protected and supported

If a Worker is being harassed or bullied, the Worker should consider whether they feel able to raise the problem informally with the person responsible. The Worker should explain clearly to the person responsible that their behaviour is not welcome or makes the Worker feel uncomfortable. If this is not appropriate in the circumstances, too difficult or embarrassing, the Worker should speak to their line manager or directly with Human Resources, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, the Worker should raise the matter under Argonon's Grievance Procedure. Where harassment is found to have occurred this will amount to misconduct or gross misconduct.

No one who makes an allegation of harassment in good faith should be subjected to any detriment as a result. If a Worker believes that they have suffered any such treatment, the Worker should inform the Whistleblowing Officer (as detailed at the end of the policy) immediately. If the matter is not then remedied, the matter should be raised formally using Argonon's Grievance Procedure.

"Good faith" does not mean that a reported concern must be correct, but it does require that a Worker be truthful when reporting a concern. Argonon aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Retaliation against someone or the victimisation of someone who reports a problem in good faith may result in sanctions against the retaliator, up to and including termination of their contract with Argonon.

If Argonon concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

#### What happens if a Worker raises a concern

Argonon will usually arrange a meeting as soon as possible to discuss the Worker's concern. The Worker will be allowed to bring a colleague or trade union representative to any meetings. Any companion must respect the confidentiality of the disclosure(s) and any subsequent investigation.

Information about a complaint by or about a Worker may be placed on the individual's 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 Argonon's data protection policy.

#### Will the Worker's concern be treated confidentially?

Argonon intends that Workers will feel able to voice whistleblowing concerns or other concerns of bullying and harassment openly under this policy. Completely anonymous disclosures are difficult to investigate. If Workers would prefer to raise their concern confidentially, Argonon will make every effort to maintain the confidentiality of the identity of the Worker and only reveal it where necessary, to those involved in investigating your concern.

### Can a Worker alert someone external to Argonon?

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, Workers should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for Workers to report concerns to an external body such as a regulator. Argonon strongly encourages Workers to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

In serious cases of sexual harassment like sexual assault, please call the police and inform HR where appropriate.

### Who Workers can contact

If a Worker has any questions regarding this policy or wants to report an incident of harassment and/or bullying the Worker should speak to the person who is responsible for overseeing Argonon's bullying and harassment policy:

Name: Jenny King  
Position: Head of HR  
Email: Jenny.king@argonon.com  
Phone number: 0207 704 3300

### Other relevant contacts

<b>Whistleblowing Officer</b>	Jenny King 0207 704 3300 Jenny.king@argonon.com
<b>COO</b>	Laura Bessell Laura.bessell@argonon.com
<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk

### Useful links:

#### [BFI Guidance](#)

A practical workplace guide for the prevention of bullying and harassment in the screen industries.

#### [The Film and TV Charity](#)

The Film and TV charity provides information and a free support line.

#### [BBC Bullying and Harassment Policy](#)

The Policy explains the support available and how one can informally or formally address issues with bullying or harassment.

#### [ITV Code of Conduct](#)

A Code of Conduct for those working for ITV.

#### [Channel 4 - Support Organisations](#)

A list of organisations who can be contacted for support regarding bullying, harassment and internet safety, compiled by Channel 4.

#### [Directors UK Bullying and Harassment Handbook](#)

A handbook for screen directors which contains useful information about behaviours and their legal status, as well as Directors UK's own code of conduct