

Anti-Harassment and Bullying Policy

1. Introduction

- 1.0 We are committed to providing a working environment free from harassment, bullying and victimisation, and ensuring all employees are treated, and treat others, with dignity and respect.
- 1.1 We recognise that harassment or bullying can occur both in and outside the workplace, such as on business trips or at work-related events or social functions.
- 1.2 Harassment, bullying or victimisation of any employee, or anyone they come into contact with during the course of their work, can be unlawful and will not be tolerated.
- 1.3 We will take active steps to help prevent the harassment, bullying and victimisation of all employees. Anyone who is a victim of, or witness to, harassment, bullying or victimisation is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support.
- 1.4 Harassment, bullying and victimisation can result in legal liability for both the business and the perpetrator, whether they work for us, or are a third-party outside of our control. The law requires employers to take reasonable steps to prevent sexual harassment of their workers, including by third parties.
- 1.5 Harassment, bullying and victimisation of any individual, whether they be an employee or someone else you come into contact with during the course of your work, may result in disciplinary action up to and including dismissal.

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2. About this Policy

- 2.0 The purpose of this policy is to set out a framework for line managers to deal with any harassment, bullying or victimisation that occurs by employees (which may include consultants, contractors and agency workers) and also by third parties, such as clients, suppliers or visitors to our premises.
- 2.1 This policy does not form part of any contract of employment or contract to provide services, and we may amend it at any time.

3. Who does this policy apply to?

- 3.0 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns working on behalf of a UK-registered Tetra Tech company¹.

4. Who is responsible for this policy?

- 4.0 The board of directors of Tetra Tech² (**Board**) has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the relevant management teams in each of Tetra Tech's operating units (each, an **OU**) with operations in the UK.
- 4.1 OU HR managers (also referred to as **local** HR managers) have day-to-day responsibility for this policy and you should refer any questions about this policy to them in the first instance.
- 4.2 This policy is reviewed annually by a committee including Tetra Tech's UK HR leads and General Counsel. We will monitor its effectiveness.
- 4.3 Suggestions for any changes should be made via your local HR team.

5. What is harassment?

- 5.0 *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.

5.1 *Unlawful harassment:*

- (a) may involve any harassment of a sexual nature (sexual harassment); or

¹ The term "employee(s)" is used throughout this policy but (save where the context requires otherwise) this shall include any individuals within these categories.

² *Tetra Tech* (also "we", "our", "us", "Company") in this policy, means Tetra Tech UK Holdings Limited (registered in England with company number 05909611) and all its UK subsidiaries. It applies to anyone working for Tetra Tech overseas, subject to any applicable local laws which impose any additional requirements to those set out in this policy.

- (b) may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

Harassment is unacceptable even if it does not fall within any of these categories.

5.2 Harassment may include, for example:

- (a) racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group, religion or belief, or gender;
- (b) disclosing or threatening to disclose someone's actual or perceived sexual orientation or gender identity against their wishes;
- (c) offensive emails, text messages or social media content;
- (d) mocking, mimicking or belittling a person's disability;
- (e) unwanted physical conduct, including touching, pinching, pushing and grabbing;
- (f) continued suggestions for social or sexual activity after it has been made clear that such suggestions are unwelcome;
- (g) 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); or
- (h) unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless).

5.3 A person may be harassed even if they were not the intended target. For example, a person:

- (a) may be harassed by racist jokes about a different ethnic group, if the jokes create an offensive environment;
- (b) may be sexually harassed by pornographic images displayed on a colleague's computer in the workplace.

5.4 In addition to any harassment of a sexual nature, *sexual harassment* 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.

5.5 *Less favourable treatment* means putting a worker at a clear disadvantage compared with a real/hypothetical comparator – for example, being deprived of a choice or excluded from an opportunity.

5.6 *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:

- (a) Bringing proceedings under the Equality Act 2010.

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

5.7 Victimization may include, for example:

- (a) Denying someone an opportunity because it is suspected that they intend to make a complaint about harassment.
- (b) Excluding someone because they have raised a grievance about harassment.
- (c) Failing to promote someone because they accompanied another colleague to a grievance meeting.
- (d) Dismissing someone because they gave evidence on behalf of another colleague at an employment tribunal hearing.

5.8 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:

- (a) In a work situation.
- (b) During any situation related to work, such as at a social event with colleagues.
- (c) Against a colleague or other person connected to us outside of a work situation, including on social media.
- (d) Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

5.9 We 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.

5.10 If any harassment or victimisation of any employee occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include updating relevant policies, providing further training and taking disciplinary action against the perpetrator.

5.11 *Third-party harassment* occurs where a person is harassed or sexually harassed by someone who does not work for, and who is not an agent of, the same employer, but with whom they have come into contact during the course of their employment.

5.12 Third-party harassment could include, for example, derogatory comments about a person's age, disability, pregnancy, colour, race, religion or belief, sex or sexual orientation from a client, customer or supplier visiting the employer's premises, or where a person is visiting a client, customer or supplier's premises or other location in the course of their employment.

- 5.13 Third-party harassment can result in legal liability and will not be tolerated. All employees are encouraged to report any third-party harassment they are a victim of, or witness, in accordance with this policy.
- 5.14 Any *harassment* by a colleague against a third-party may lead to disciplinary action up to and including dismissal.
- 5.15 We will take active steps to try to prevent third-party harassment of employees.
- 5.16 If any third-party harassment of employees occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other parts of the business.
- 5.17 We will provide training for all employees around harassment and bullying, including additional training for any employees or locations identified as being higher risk.

6. What is bullying?

- 6.0 *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.
- 6.1 Bullying may include overbearing and intimidating levels of supervision or inappropriate derogatory remarks about someone's performance. However, legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, will not amount to bullying.

7. If you are being harassed or bullied, what you can do informally

- 7.0 If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible.
- 7.1 You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult, you should speak to your line manager or your local HR team, who can provide confidential advice and assistance in resolving the issue formally or informally.
- 7.2 If you feel unable to speak to your line manager because the complaint concerns them, you should speak informally to your local HR team. If this does not resolve the issue, you should follow the formal procedure below.

- 7.3 If you are not certain whether an incident or series of incidents amounts to bullying or harassment, you should initially contact your line manager or local HR team informally for confidential advice.
- 7.4 If informal steps are not appropriate, or have been unsuccessful, you should follow the formal procedure set out below or, if applicable, refer your OU's Grievance Procedure.

8. Raising a formal complaint

- 8.0 If you wish to make a formal complaint about bullying or harassment, you should submit it in writing to your line manager. If the matter concerns your line manager, you should submit it your local HR team.
- 8.1 Your written complaint should set out full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 8.2 If you wish to make a formal complaint about victimisation, you should submit it in writing to your line manager. If the matter concerns your line manager, you should submit it to your local HR team.
- 8.3 You may also make a complaint to:

Internally

- (a) The Tetra Tech Corporate Human Resources department
tes.corporatehumanresources@tetrattech.com
- (b) Tetra Tech's General Counsel/Chief Compliance Officer at +1 626-470-2481 or
general.counsel@tetrattech.com

Externally

- (c) Tetra Tech's anonymous, 24-hour-a-day Ethics Hotline: dial 0808-234-9250 (within the UK) or see *MyTetraTech*³ to access a full list of hotline numbers available outside of the UK
- (d) Tetra Tech's anonymous online reporting portal at tetrattech.ethicspoint.com
- 8.4 Your written complaint should set out full details of the conduct in question, including the name of the person(s) you believe have victimised you, the reason you believe you have been victimised, the nature of the victimisation, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

³ <https://tetrattechinc.sharepoint.com/sites/Legal/SitePages/Ethics-and-Compliance.aspx>

8.5 As a general principle, the decision whether to progress a complaint is up to you. However, we have a duty to protect all employees and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

9. If you witness harassment or victimisation

9.0 Employees who witness harassment or victimisation are encouraged to take appropriate steps to address it. Depending on the circumstances, this could include:

- (a) Intervening where you feel able to do so.
- (b) Supporting the victim to report it or reporting it on their behalf.
- (c) Reporting the incident where you feel there may be a continuing risk if you do not report it.
- (d) Cooperating in any investigation into the incident.

9.1 All witnesses will be provided with appropriate support and will be protected from victimisation.

10. Formal investigations

10.0 We will investigate complaints in a timely, respectful and confidential manner. Individuals not involved in the complaint or the investigation should not be told about it.

10.1 We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague of your choice, who must respect the confidentiality of the investigation.

10.2 Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the alleged harasser or bully who may also be accompanied by a colleague of their choice to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

10.3 Where your complaint is about someone other than an employee, such as a client, supplier or visitor, we will consider what action may be appropriate to protect you 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, we will attempt to discuss the matter with the third party.

10.4 We will also seriously consider any request that you make for changes to your own working arrangements during the investigation. For example, you may ask for changes to your duties or working hours to avoid or minimise contact with the alleged harasser or bully.

- 10.5 It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.
- 10.6 At the end of the investigation, the investigator may submit a report to a senior manager or local HR representative. The investigator, senior manager or local HR representative may arrange a meeting with you, usually within a week of receiving the report, in order to discuss the outcome and what action, if any, should be taken. You have the right to bring a colleague to the meeting. A copy of the report and the investigator's findings may be given to you and to the alleged harasser, where appropriate.

11. Actions following the investigation

- 11.0 If the investigator, senior manager or local HR representative considers that there is a case to answer and the harasser or bully is an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under their OU Disciplinary Procedure. Our investigation into your complaint may be put on hold pending the outcome of the Disciplinary Procedure. Where the disciplinary outcome is that harassment or bullying occurred, prompt action will be taken to address it.
- 11.1 If the harasser or bully is a third party, such as a client or other visitor, we will consider what action would be appropriate to deal with the problem.
- 11.2 Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the person concerned. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.
- 11.3 Any employee who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under their OU Disciplinary Procedure.

12. Making an Appeal

- 12.0 If you are not satisfied with the outcome, you may appeal in writing to your local HR team, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you in writing.
- 12.1 We will hold an appeal meeting, normally within one week of receiving your written appeal. Where practicable, the appeal hearing will be conducted by a senior manager who has not been previously involved in the case and is senior to the individual who conducted the previous meeting. They may ask anyone previously involved to be present. You have the right to bring a colleague to the meeting.

12.2 We will confirm our final decision in writing, usually within one week of the appeal hearing. This is the end of the procedure and there is no further right of appeal.

13. Protection and support for those involved

13.0 Employees who make complaints, report that they have witnessed wrongdoing, or who participate in good faith in any investigation, must not suffer any form of retaliation or victimisation as a result. This will not be tolerated. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under their OU Disciplinary Procedure.

13.1 If you believe you have suffered any such treatment, you should inform your local HR team. If the matter is not remedied, you should raise it formally using your OU Grievance Procedure or this procedure, if appropriate.

13.2 We will monitor the treatment and outcomes of any complaints of harassment or victimisation we receive 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.

13.3 Your OU may offer access to confidential counselling for anyone affected by, or accused of, bullying or harassment. Please speak to your local HR team or consult your OU intranet/SharePoint for further details of any applicable Employee Assistance Programme.

13.4 Support and guidance can also be obtained from our workplace equality champions and the following external services:

- (a) The Equality Advisory and Support Service (www.equalityadvisoryservice.com).
- (b) Protect (www.protect-advice.org.uk).
- (c) Victim support (www.victimsupport.org.uk).

14. Reporting outcomes, confidentiality and record-keeping

14.0 Confidentiality is an important part of the procedures provided under this policy. Details of the investigation and the names of the person making the complaint, and the person accused must only be disclosed on a "*need to know*" basis. Breach of confidentiality may give rise to disciplinary action under your OU Disciplinary Procedure.

14.1 Where appropriate and possible, where a complaint is upheld, we will advise the complainant of the action that has been taken to address their specific complaint and any measures put in place to prevent a similar event happening again.

- 14.2 Information about a complaint by or about an employee 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 our Data Protection Policy.
- 14.3 We will monitor risks of bullying and harassment on an ongoing basis.