

PUNCH

Inspiring those moments

Bullying and Harassment 2026



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Purpose of the Policy

As part of the Pineapple Family, everyone is welcome, and we want all our people to feel safe and comfortable to be their true self. The safety of our people is Punch's number one priority and as such, we operate a Zero tolerance policy towards Bullying and Harassment of any kind.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 introduced a legal duty for employers to proactively take all reasonable steps to prevent sexual harassment, in line with the evolving legal standard.. Punch in line with this continues to create a culture where sexual harassment is understood to be unacceptable, including anyone in a position of authority.

This includes our commitment to reviewing how we manage and mitigate risk, developing and refreshing existing policies and equipping our people with information and support tools on all aspects of harassment, training managers on their responsibilities, and creating an environment where people feel safe to report incidents of sexual harassment and situations where they felt unsafe.

Our Commitment

At Punch, any incidents that appear to include any form of Bullying or Harassment will be taken very seriously. Our Commitment is to be committed to providing a safe environment for all colleagues and stakeholders, and no form of harassment is permitted or condoned.

We encourage colleagues and stakeholders to be vigilant and feel confident and supported to call out any behaviour they deem to be harassment. This policy helps us to put this commitment into practice and by complying with this policy, you are helping to ensure that we all take reasonable steps to prevent any type of harassment inclusive of any sexual harassment of our employees and stakeholders as required by law.

This commitment should be read in conjunction with our Code Of Ethics, Whistle Blowing & Disciplinary and Grievance policies that are already in place. In addition, we care about not only helping to support better knowledge, but it is also important for us to equip on the how and so aim to have three stages to our overall approach:

- **Explore (Phase 1): Build knowledge and awareness**
- **Grow (Phase 2): Grow in our approach on how we do things**
- **Thrive (Phase 3): Embedding our learnings from Phase 1-3 across key parts of the business**

We've created this phased approach to ensure each of us plays a part in calling behaviours out and keeping our people safe and respected. Using insight for our Risk Register specifically aimed at reviewing what more we can actively do in this space as well as insight provided through our Punch Pulse survey, which seeks to actively gauge how we are doing and what more can be done in this space.

In addition to our overall plan, we are committing to providing line managers with additional training and seek to provide targeting learning that will ensure our People team and those who support any investigations linked to harassment on how to handle investigations, grievances and hold difficult conversations are put in place before end of 2025.

Look at our interactive plans with our Equality Diversity and Inclusion volunteers for further information found on our Push The Pineapple Wellbeing page, as well via our Employee HR Shared Point area. This is all with an aim to support and protect, and applies to all colleagues, contractors, Publicans, visitors and third parties engaging with Punch.

What is Bullying?

ACAS define bullying as offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

What is Harassment?

In the Equality Act 2010, 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 an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Bullying and Harassment may be against one or more people and can involve an inappropriate abuse of power. It may involve single or repeated incidents ranging from extreme forms of intimidating behaviour, such as physical violence, to more subtle forms such as ignoring someone.

No form of harassment is permitted or condoned in the work environment. Punch wants all employees to discourage all harassment – sexual or any other type- by speaking up and making it clear that such behaviour is unacceptable (see our Call It Out Form found via the Employee section via The Punch Intranet). We are committed to investigate all alleged comments and actions and the effect they have had on the recipient, including the intent to cause offence and any other factors. Disciplinary action, up to and including summary dismissal, will be taken against any employee found to harass colleagues and any other persons

What is Sexual Harassment?

Sexual harassment is unwanted behaviour of a sexual nature. The law (Equality Act 2010) protects the following people against sexual harassment at work:

- Employees and workers
- Contractors and self-employed people hired to personally do the work
- Job applicants

To be sexual harassment, the unwanted behaviour must have either:

- Violated someone's dignity
- Created an intimidating, hostile, degrading, humiliating or offensive environment for someone

It can be sexual harassment if the behaviour:

- Has one of these effects even if it was not intended
- Intended to have one of these effects even if it did not have that effect

Some examples of this could be:

- unwanted physical contact
- unwelcome remarks about a person's age, gender, dress, appearance, race, religion, sexual orientation or beliefs, or could be jokes at personal expense, offensive or abusive language, gossip or slander
- posters, graffiti, obscene gestures, flags, bunting and emblems
- isolation or non-cooperation and exclusion from social activities
- coercion
- pressure to participate in political/religious groups
- personal intrusion from pestering, spying and stalking
- failure to safeguard confidential information
- setting impossible deadlines
- persistent unwarranted criticism
- personal insults

What does sexual harassment look and sound like?

The following behaviour can be sexual harassment at work (and outside work in relation to events involving colleagues or on company premises)

- Written or verbal comments of a sexual nature, such as banter or remarks about an employee's appearance, their sex life or sexual jokes about them or others.
- Circulating sexual images, social media posts or e-mails with content of a sexual nature, including foul language and sexual reference.
- Any unwanted physical contact and touching, including actions which, while one person may consider them to be harmless, others may consider them to be unwelcome and unacceptable.
- Sexual coercion, sexual assault, rape and physical threats.

Policy Details

Any form of bullying or harassment can be harmful and subject a person to fear, stress and anxiety which can in turn put stress on work, personal and family life. It can also lead to isolation, illness, accidents, absenteeism and poor performance.

Sometimes those who are harassed, victimised or bullied may often feel vulnerable/ reluctant or unable to speak up and as such, it is important for us all to look out for each other and speak out if we witness something that isn't right or should we feel that somebody needs support.

This policy aims to ensure the fair treatment and dignity of all our people. Any form of bullying or harassment **will not be tolerated** at Punch (unlawful or not) and will be treated as gross misconduct.

Some types of sexual harassment, such as sexual assault and other physical threats, are a criminal matter as well as an employment matter. Criminal matters should be reported to the Police:

- Call 999 if you or someone else is in immediate danger.
- Call 101 to contact police if it is not emergency.

If a complaint is reported to the police or criminal court proceedings are being pursued, Punch Pubs & Co will investigate the complaint as an employment matter. The company may then follow the disciplinary procedure without waiting for criminal proceedings, provided this can be done fairly.

Employer and Employee Responsibilities

Punch are committed to promoting an inclusive workplace where everyone is welcome. This policy will be enforced in any instances of bullying or harassment that are brought to our attention.

All our people have a responsibility to behave in a way which supports a safe and inclusive working environment for themselves and colleagues.

Everyone has the authority to challenge inappropriate behaviour and where bullying or harassment has been witnessed, report it to the appropriate person to investigate the situation as soon as possible.

Any individual alleged to have subjected a colleague, Publican/MP, customer or supplier to bullying or harassment will be investigated and subject to a formal Disciplinary Procedure and depending on the severity, the law. They will be notified of the allegation made against them as soon as is practically possible.

Punch's responsibility to investigate allegations of bullying and harassment is not confined to working hours and may include social events, hospitality or anywhere where the incidents have an impact on the company.

Dealing with Harassment

Anyone who believes that they have been subject to, or have witnessed harassment, victimisation or bullying have access to channels through which this can be raised.

All claims of bullying and harassment will be dealt with initially in accordance with the company grievance procedure. However, given the nature of harassment, victimisation or bullying it is recognised that an individual may not wish to discuss it initially with their immediate line manager or supervisor. As such, it may be more appropriate to discuss with another manager or your HR colleague.

Complaints will be handled quickly, sensitively and a way that is fair to the employee who has made the complaint, anybody who has witnessed the sexual harassment and anybody who is being accused. Employees who raise concerns about sexual harassment will be protected under whistleblowing legislation and will not suffer any detriment for making a protected disclosure. Managers will be supported in handling an appropriate investigation.

Where a person feels they are unable to raise awareness of harassment with either a manager or the HR/People team, they can first contact our external Employee Assistance providers Health Assured for further advice (just log onto your Perkbox account for all the information) or use our Call It Out Form (accessed via the Employee sections of the Punch Shared Point Page on the company intranet)

Who can sexual harassment happen to?

Sexual harassment can happen to all people, irrespective of their gender. Employees can be sexually harassed by people of the same or different gender. Sexual harassment can come from a colleague, manager or someone else who employees come in contact with while they are working, including customers and third parties.

Historic allegations

Sometimes complaints of sexual harassment will be reported much later than they first happened. Employees should feel confident all complaints will be taken seriously.

Please note that individuals can be ordered to pay unlimited damages where discrimination based harassment has occurred, including the payment of compensation for injury to feelings.

Examples of Unacceptable Behaviour

The following behaviours as defined below are unacceptable:

Harassment consists of any unwanted conduct affecting the dignity of a person. It includes unwelcome physical, verbal or non-verbal conduct and it could amount to unlawful discrimination. It can involve a single incident or may be persistent and may be directed towards one or more individuals. It can be in relation to (but not limited to) race, creed, colour, nationality, ethnic origin, an individual's age, language, religion, political or other opinion affiliation, gender, gender reassignment, sexual orientation, marital status, connections with a national minority, national or social origin, property, birth or other status, family connections, membership or non-membership of a trade union, or disability.

Unwanted Physical Contact such as unnecessary touching, patting, pinching, brushing against another individual's body, insulting or abusive behaviour or gestures, physical threats, assault, or coercion of any kind.

Unlawful Victimisation consists of treating an individual less favourably than others are, or would be treated in the same or similar circumstances, because they have made a complaint or allegation of discrimination or have acted as a witness or informant in connection with proceedings under any Discrimination Legislation.

Other Conduct which denigrates, ridicules, intimidates or is physically abusive of an individual or group.

Unwanted Verbal Conduct such as unwelcome advances, patronising titles or nicknames, propositions or remarks, innuendo, lewd comments, jokes, banter or abusive language, which refer to an individual or a group's gender, colour, race, nationality, ethnic or national origins, disability, sexual preference, etc., repeated suggestions for unwanted social activities inside or outside the workplace.

Unwanted Non-Verbal Conduct such as racially or sexually based graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, display of pornographic or suggestive literature or other items, pictures or films/videos or inappropriate use of visual display units (VDUs) or network systems for this purpose.

Bullying, including persistent criticism and personal abuse and/or ridicule, either in public or private, which humiliates or demeans the individuals involved and can gradually erode their self-confidence.

These examples **are not exhaustive**. Much of this behaviour would be considered to be gross misconduct, leading to summary dismissal. However, **none of the above types of behaviour will be tolerated**. All will result in a disciplinary investigation and may constitute gross misconduct depending upon the circumstances of the case in question.

Other associated policies and procedures:

Company Disciplinary & Grievance Procedure
Ethics and Code of Conduct Policy
Whistleblowing Policy

Policy Review History

Date Reviewed	Reviewed By	Next Review Due	Summary of Changes
March 2026	People Team	March 2027	