

Bullying & Harassment Policy

People Function

1 Bullying and Harassment Policy

1.1 Our Aim

At Octopus we create an environment where every member of our company can work in a supportive environment which is free from bullying, harassment and victimisation.

We expect everyone associated with Octopus to behave in line with our policies, including employees, contractors, founders, funders, investors, mentors, advisors, students, volunteers, speakers, and attendees of our events. This policy applies to all these people in any setting associated with Octopus, including offices, work events, social outings, conferences, homes, lodging, phone calls, video conferences, emails, chat, social media, blogs, or other online communication.

Octopus will not tolerate any form of bullying or harassment of any kind and all allegations will be addressed, either through informal or formal routes. If an allegation is proven, this may result in disciplinary action being taken.

1.2 What is Bullying and Harassment

The terms bullying and harassment are used interchangeably by most people. Many definitions include bullying as a form of harassment. Harassment also includes sexual harassment

Harassment means unwanted conduct that affects the dignity of colleagues in the workplace. It may relate to:

- age
- sex
- race
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- disability
- religion or belief
- sexual orientation
- nationality
- any personal characteristic of the individual

Harassment may be persistent or an isolated incident. The key is that the behaviour is received as demeaning and unacceptable to the recipient.

Bullying means behaviour that is:

- offensive
- intimidating
- malicious
- insulting

It can be an abuse or misuse of power through means intended to undermine, humiliate, belittle or injure the recipient. It may be obvious, or it may be sneaky.

Whatever form it takes, it is unwarranted and unwelcome to the individual.

Examples of bullying or harassing behaviour include:

- copying memos that are critical about someone to others who do not need to know
- ridiculing or demeaning someone
- exclusion or victimisation
- unfair treatment
- overbearing supervision or other misuse of power or position
- unwelcome sexual advances

Unwelcome sexual advances include but are not limited to:

- touching (including brushing up against an individual)
- standing too close
- display of offensive materials (this may be photos, pictures, sending inappropriate content on email)
- asking for sexual favours
- making decisions based on accepted or rejected sexual advances
- Unsolicited comments on someone's self-presentation (dress, shoes, makeup, hair) that are sexually suggestive
- Arranging meetings in inappropriate locations (e.g. hotel rooms)

Bullying and harassment can happen face-to-face and by:

- letter
- email
- phone
- social media
- internal communications systems i.e. Slack, Skype.

1.3 What is Victimisation

Victimisation is when an individual is treated differently and not given opportunities because they are suspected, or it becomes known that they have complained or given evidence which has resulted in a complaint. It also applies when an individual might make a complaint but hasn't yet, however behaviour towards them changes.

If an individual genuinely believes that what they are saying is true and correct, they have the right not to be victimised. Any form of victimisation will be dealt with through the Octopus disciplinary procedures.

1.4 What is Discrimination

Discrimination in the workplace is based on certain prejudices and occurs when an individual is treated unfavourably because of characteristics they possess. It is unlawful to discriminate against people in nine areas termed in the legislation as protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex

- sexual orientation

1.5 How to Report a Complaint

At Octopus we want to assure you that your complaint will be taken seriously, if you have a complaint then you should raise it through the following channels.

- Speak to your line manager or another manager within your team
- Speak to your HR Business Partner and/or a member of the People Team
- Speak to any member of Exco
- Submit your complaint anonymously to complaints@octopusinvestments.com
- Submit your complaint through anonymous hotline: 0800 294 6824
- If you are external to the company and wish to make a complaint you can do so by submitting your complaint to our People Director, Kirstie Hawton (Kirstie.Hawton@octopusgroup.com) who will investigate and confirm the outcome once investigated.

1.6 Resolution Processes

Octopus can deal with your complaint in both an informal or formal process. Before starting a process we would encourage you to tell the offender promptly that his/her/their behaviour is unwelcome and ask that it stop.

We understand that request may not be enough to stop the conduct. We also know that you may not feel comfortable confronting the offender directly, especially if that person is a supervisor or otherwise in a position of authority over you; in such cases, the informal process may be a good option.

The informal process:

Under the informal process, you are not making a formal complaint against the alleged offender and you are not requesting an investigation. However, even under the informal process, you can request that the supervisor, another manager or Leadership Team member speak to the alleged offender.

You should be aware all informal conversation discussing harassment or discrimination should be passed on to the People Team. It will be the responsibility of the senior management to inform the People Team. In most cases of an informal process no investigation will be initiated, and no action will be taken against the alleged offender if that is what you desire.

That said however, the People team may decide independently that it is necessary to act beyond an informal discussion in order to deal with that situation appropriately. For example, People may have a duty to investigate if the situation seems imminently dangerous or if the person may do harm to themselves or someone else. This may be the case if there are multiple reports against someone. The best course of action in any case will depend on many factors and, therefore, the informal procedure will remain flexible.

The formal process

This process will follow our current grievance and disciplinary processes which can be found on the [intranet](#).

External complaints - formal process:

Reporting a complaint: We encourage you to report any violations of our code of conduct by sending a written complaint to complaints@octopusinvestments.com which is monitored by our HR team or our People Director, Kirstie Hawton Kirstie.Hawton@octopusgroup.com. An alternative contact is the Octopus Ventures CEO, Alliot Cole.

Investigation – Upon receiving the note of grievance and investigation may occur, if necessary. To be sure we have a full understanding of your complaint, we will invite you to attend a meeting to discuss your grievance within 5 working days. This meeting will be conducted by a member of the HR team.

Action– Upon completion of the investigation and meeting a course of remedial action will be determined. Such actions may include written or verbal warnings, performance evaluation, suspension, or dismissal.

Appeal – If you are dissatisfied with the outcome of the process, you have the right to appeal. To do so you should notify your superior or the HR team with a written description of your grounds of appeal. You will then meet with the senior HR team to discuss the grievance and appeal. Depending on what information comes to light in this meeting, it may be the case that different action will be taken, but not always.

Confidentiality - When investigating a matter, the Company will bear in mind any concerns you raise relating to confidentiality, but you should be aware that a full investigation may not be possible without restricted disclosures and that, without a full investigation, it may not be possible or appropriate for the Company to reach the decision on your grievance that you desire

Timeline – You can raise a complaint at any time, no matter how long ago an incident took place. We take these complaints seriously and will move as quickly as possible, with the hopes that you'll do the same.