Anti-Harassment, Bullying and Sexual Harassment Policy

1. Purpose

Corstorphine & Wright is committed to maintaining a professional, inclusive and respectful working environment in which all employees, workers, contractors, clients, consultants, visitors and other third parties are treated with dignity and respect.

We maintain a zero-tolerance approach to harassment, bullying, discrimination, victimisation and sexual harassment. We expect everyone who works with us, including clients, consultants, contractors, suppliers, agency workers, visitors and other third parties, to uphold these standards.

This policy sets out our expectations of third parties and explains how concerns will be addressed if inappropriate behaviour occurs.

2. Scope

This policy applies to all third parties who interact with Corstorphine & Wright employees, workers, contractors and representatives, including:

- Clients and their representatives
- Consultants
- Contractors and subcontractors
- Suppliers and service providers
- Agency workers
- Visitors to our studios and sites
- Business partners
- Members of the public engaging with our employees

The policy applies to interactions that take place:

- At any Corstorphine & Wright studio, premises or workplace
- On construction or project sites
- During business travel
- At work-related meetings, events, conferences or social functions
- Through telephone conversations
- In written communications
- Via email, messaging platforms, social media and other digital channels

3. Statement of Commitment

Corstorphine & Wright is committed to taking all reasonable steps to prevent harassment, including sexual harassment, of its employees and workers by third parties, in accordance with its statutory obligations.

We will proactively identify and assess risks, implement appropriate preventative measures and respond promptly and proportionately to concerns or incidents of unacceptable behaviour

Harassment, sexual harassment, bullying, discrimination and victimisation may constitute unlawful conduct and will not be tolerated under any circumstances.

Third parties are expected to behave professionally and respectfully at all times when engaging with our people.

4. Definition of Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

Marriage and civil partnership, and pregnancy and maternity, are also protected characteristics under the Equality Act 2010. Although they are not expressly included within the specific definition of harassment related to a protected characteristic under Section 26(1), conduct relating to them may constitute unlawful discrimination or other prohibited conduct and is not tolerated by Corstorphine & Wright.

Harassment may be verbal, non-verbal, written, physical or online, and whilst not an exhaustive list, examples may include:

- Offensive comments, jokes or stereotypes
- Insults, ridicule or mockery
- Excluding individuals from meetings or discussions
- Intimidating or threatening behaviour
- Displaying offensive material
- Repeated unwanted communications
- Derogatory remarks relating to a protected characteristic

5. Definition of Sexual Harassment

Sexual harassment is any unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Examples may include:

- Unwanted sexual advances
- Requests for sexual favours
- Inappropriate touching or physical contact
- Sexual jokes, comments or innuendo
- Comments about a person's appearance or body
- Repeated invitations after a person has indicated they are not welcome
- Sharing sexually explicit or inappropriate content
- Displaying sexual images or materials
- Offensive remarks regarding sexual orientation or gender identity

The intention of the individual carrying out the behaviour is not the determining factor. The impact of the behaviour on the recipient will be taken seriously.

Third-Party Sexual Harassment

Corstorphine & Wright recognises its statutory responsibility to take all reasonable steps to prevent sexual harassment of its employees and workers, including harassment by clients, contractors, consultants, suppliers and other third parties.

We will assess the risks associated with third-party interactions and implement proportionate preventative measures, including communicating our behavioural expectations, providing appropriate training and maintaining accessible reporting procedures.

We reserve the right to investigate concerns involving third parties and take appropriate action where conduct does not meet the standards required by this Policy.

6. Definition of Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour that involves the misuse of power or position and leaves an individual feeling vulnerable, upset, humiliated or threatened. Whilst this is not an exhaustive list, examples include:

- Shouting, aggressive behaviour or intimidation
- Persistent unjustified criticism
- Public humiliation
- Deliberately undermining a person's work or reputation
- Spreading malicious rumours
- Excluding individuals from communications or activities
- Excessive or unreasonable demands designed to cause distress

7. Expectations of Third Parties

All third parties working with or visiting Corstorphine & Wright are expected to:

- Treat all individuals with dignity and respect.
- Communicate professionally and courteously.
- Refrain from any conduct that could reasonably be perceived as harassment, bullying, discrimination, victimisation or retaliation.
- Respect personal boundaries.
- Cooperate with any investigation relating to alleged misconduct.
- Comply with this policy and any site-specific behavioural requirements.
- Promote a professional and inclusive working environment in all interactions with Corstorphine & Wright employees and representatives.

8. Reporting Concerns

Any employee, worker or third party who experiences or witnesses unacceptable behaviour is encouraged to report the matter promptly.

Concerns may be reported in several ways according to C&W's whistleblowing Policy. You can contact the People & Culture Team by email: people@cw-architects.co.uk

Alternatively, concerns may be raised through the Company's whistleblowing service WhistleB or via an appropriate Manager or Director.

Where concerns are raised by a third party regarding the conduct of a Corstorphine & Wright employee, worker or representative, these will also be taken seriously and investigated in accordance with relevant company procedures.

Concerns may be raised without fear of retaliation and will be treated seriously, whether reported formally or informally.

Where a concern involves a member of the People & Culture Team, a Manager or a Director, the matter may be reported through an alternative reporting channel, including the Company's independent whistleblowing service WhistleB https://report.whistleb.com/en/cwarchitects

Individuals raising concerns will be informed of the process to be followed and, where appropriate, the outcome, subject to confidentiality and data protection requirements.

9. Investigation Process

All concerns will be assessed promptly, fairly and impartially, taking account of the nature and seriousness of the allegations.

Investigations will be undertaken by an appropriate person who is not directly involved in the matter. Where necessary, external support may be appointed to ensure independence.

Appropriate records will be maintained of concerns raised, investigations undertaken, findings and any preventative or corrective actions implemented, in accordance with applicable data protection requirements.

Corstorphine & Wright may:

- Meet with the affected individual(s)
- Gather evidence and witness statements
- Speak with the third party concerned
- Review relevant correspondence, communications or records
- Assess whether the reported behaviour breaches this policy

Where necessary to protect the wellbeing, safety or dignity of our employees, workers or other individuals, Corstorphine & Wright reserves the right to implement interim measures while an investigation is ongoing.

Such measures may include:

- Restricting access to company premises or project sites
- Changing points of contact
- Removing individuals from meetings or project activities
- Suspending engagement pending investigation

Appropriate action will be taken based on the findings of the investigation.

10. Protection from Retaliation

Corstorphine & Wright prohibits retaliation against any person who:

- Raises a concern in good faith;
- Assists with an investigation; or
- Acts as a witness in relation to a complaint.

Any retaliatory behaviour may result in action being taken, including the termination of business relationships, contracts or services where appropriate.

11. Action Following Breaches

Where a third party is found to have breached this policy, Corstorphine & Wright reserves the right to take appropriate action, including:

- Issuing a formal warning;
- Requiring specific individuals to be removed from a project, assignment or work location;
- Restricting access to company premises, studios or project sites;
- Removing individuals from meetings, events or business activities;
- Suspending work, services or contractual arrangements;
- Terminating contracts or business relationships;
- Reporting matters to relevant professional bodies, regulatory authorities or law enforcement agencies where appropriate.

Corstorphine & Wright reserves the right to remove individuals from meetings, events, project teams, studios or sites immediately where behaviour is considered inappropriate or where there is a risk to the wellbeing, safety or dignity of our employees or others.

Any suspension or termination of contractual arrangements will be undertaken in accordance with the applicable contractual provisions and legal requirements.

Nothing in this Policy prevents Corstorphine & Wright from taking immediate and proportionate protective measures where necessary to safeguard the wellbeing, safety or dignity of individuals.

Any action taken will be proportionate to the severity and nature of the conduct.

12. Responsibilities of Clients, Contractors and Suppliers

Corstorphine & Wright encourages all organisations with whom we work to maintain and enforce their own policies relating to harassment, discrimination, bullying, victimisation and sexual harassment.

Clients, contractors, consultants, suppliers and other business partners are expected to communicate the standards of this Policy to their employees, representatives, subcontractors and agents who may interact with Corstorphine & Wright personnel.

They are expected to take appropriate preventative measures within their own organisations and cooperate with Corstorphine & Wright in addressing concerns involving individuals acting on their behalf.

Where concerns involve employees, contractors or representatives of another organisation, we may work collaboratively with that organisation to investigate and resolve the matter.

Failure to address inappropriate behaviour may be taken into account when reviewing ongoing business relationships.

13. Review

This policy will be reviewed annually and updated where necessary to reflect changes in legislation, guidance and best practice.

In addition to the annual review, this Policy will be reviewed following significant incidents, material changes in legislation or guidance, or where risk assessments identify a need for additional preventative measures.

Corstorphine & Wright remains committed to fostering a respectful, inclusive and safe working environment for everyone who works with us or on our behalf.

Policy Statement

Corstorphine & Wright expects all individuals and organisations with whom we work to share our commitment to dignity, respect, inclusion and professional conduct.

Behaviour that undermines these principles will not be tolerated and may result in corrective action, removal from projects or sites, or the cessation of the working relationship.

Signed:



Ed Baverstock

Date: 30.10.2026

For & On Behalf of Corstorphine & Wright Ltd