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**WARNER BROS.  
TELEVISION  
PRODUCTION UK  
GROUP**

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**ANTI-BULLYING & ANTI-  
HARASSMENT  
POLICY**

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## **INTRODUCTION**

All forms of bullying, harassment and discrimination are prohibited by Warner.

When bullying, harassment or discrimination occurs, it can bring about a climate of fear and insecurity, can demoralise those on the receiving end and can sometimes affect work performance. It is therefore vital that every employee and member of Warner's non-employee workforce understands his or her responsibilities under this Policy. Warner will not tolerate acts which breach this Policy and all instances of such behaviour or alleged behaviour will be taken seriously.

This Policy is effective from January 2020. It does not form part of your terms and conditions of employment or engagement and, in any event, we reserve the right to review, revise, amend or replace the contents of this Policy to reflect the changing needs of the business or to comply with new legal developments.

This Policy is applicable to all employees and members of the non-employee workforces of Warner Bros. Television Production UK Limited and each of its subsidiary companies (each referred to as Warner in this document).

All managers have a specific responsibility to operate within the boundaries of this Policy, ensure that all staff understand the standards of behaviour expected of them and to take action when behaviour falls below its requirements. Managers will be given training in order that they may do so.

Please also refer to Warner's Equal Opportunities Policy which deals with discrimination in more detail or speak to HR for further information.

## **WHAT ARE BULLYING AND HARASSMENT?**

**Bullying** is offensive, intimidating, malicious or insulting behaviour often involving the misuse of power that can make an individual feel vulnerable, upset, denigrated, injured, humiliated, undermined or threatened. Power does not always mean a position of authority but can include personal strength and power to coerce through intimidation.

**Harassment** is unwanted conduct that has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient. Unacceptable conduct may amount to discrimination and relate to a protected characteristic under equality legislation (namely; age, civil partnership, disability (whether mental or physical), gender reassignment, marital status, pregnancy or maternity, race including nationality, ethnic or national origin, religion or belief, sex or sexual orientation) or it may relate to a personal characteristic that is not a protected characteristic. Not all harassment is sexual but sexual harassment is gender-neutral and orientation-neutral and can be perpetrated by any gender against any gender.

Unacceptable conduct can be intentional or unintentional and involve action or inaction. It can be targeted at a particular individual or group; or not targeted at all and can be perpetrated by an individual at the same or a different level/department to the recipient. Unacceptable conduct may be repeated or an isolated incident and may take place in private or in front of colleagues. It does not have to take place face to face but can, for example, be through written communications (including email), visual images, telephone/texting or social media/online (including instant messaging and blogs). Condoning, overlooking or excusing unacceptable conduct may be bullying or harassment in itself.

Regardless of how you are employed or engaged by Warner, you should not be bullied, harassed or discriminated against by anyone involved with Warner.

## **EXAMPLES OF UNACCEPTABLE CONDUCT**

Examples of unacceptable conduct include, but are not limited to, the following:

- (i) unsolicited or unwelcome conduct of a sexual nature, including touching, staring or commenting (e.g. comments of a sexual nature about a person's appearance or dress, unsolicited or unwelcome sexual advances or requests for sexual intimacy, sexually explicit emails or other electronic communications/messaging);

- (ii) subjecting someone to a detriment for rejecting (or complaining about) unwelcome conduct of a sexual nature or indicating that acceptance of such unwelcome conduct will lead to favourable treatment;
- (iii) verbal abuse including shouting, threatening, swearing or insulting behaviour;
- (iv) sexist or racist jokes, jokes about an individual's age, sexual orientation or physical or mental attributes, or jokes of a sexual nature;
- (v) unwelcome comments or "banter" that is offensive to the recipient even if they were not the intended target;
- (vi) the display or circulation of sexually suggestive or racially abusive material;
- (vii) ridiculing someone or picking on them in private or in public;
- (viii) spreading rumours about or insulting somebody either directly or indirectly;
- (ix) refusing to communicate, excluding individuals or groups or socially isolating them;
- (x) intentionally setting unrealistic objectives or deadlines;
- (xi) belittling a person's creative input or other abilities;
- (xii) constant criticism which cannot be justified;
- (xiii) cyber bullying, for example, making or publishing discriminatory or derogatory comments on social media or abuse via instant messenger;
- (xiv) "mobbing" (where there is more than one perpetrator involved); and
- (xv) victimisation.

Please note that, it is unlikely that reasonable management action will constitute bullying, harassment or discrimination. Reasonable management action includes, but is not limited to, giving reasonable instructions, giving constructive feedback, carrying out performance reviews, dealing with minor disciplinary issues informally or following performance management or disciplinary procedures fairly.

While Warner's principal concern is to ensure that no form of bullying, harassment or discrimination occurs in the workplace (which includes when you are on location), you are also expected to adhere to this Policy outside work including, for example, at Warner's social events, at informal social events with colleagues, during travel to and from work, in accommodation provided by Warner, on social media and in all interactions with colleagues. Please be mindful that alcohol and drugs can affect behaviour and that, being under the influence of alcohol or drugs, is not an acceptable excuse for a breach of this Policy.

The principles in this Policy also apply to the way in which Warner and its employees and members of its non-employee workforce treat visitors, applicants, clients, customers, suppliers and former colleagues.

### **WHAT HAPPENS IF YOU BREACH THIS POLICY?**

The highest standards of conduct are required of everyone regardless of seniority and how they are employed or engaged by Warner. Breaches of this Policy will not be tolerated, and any employee or member of Warner's non-employee workforce found guilty of bullying, harassment or discrimination or any other breach of this Policy runs a significant risk of disciplinary or other action, up to and including termination of their employment or engagement.

### **REPORTING BULLYING, HARASSMENT OR DISCRIMINATION**

Warner encourages its employees and its non-employee workforce to raise, in good faith, any concerns that they have under this Policy.

All complaints will be handled fairly and sensitively. Furthermore, all employees and members of Warner's non-employee workforce shall be protected from victimisation, coercion, intimidation, retaliation, interference or discrimination for reporting in good faith any alleged acts of bullying, harassment or discrimination or participating in an investigation of a bullying, harassment or discrimination complaint. Such victimisation is unlawful.

Warner encourages you to take action as soon as possible in relation to any acts of bullying, harassment or discrimination, either against you or that you have witnessed against someone else. If, however, Warner reasonably considers that you have not acted in good faith in making a complaint or as part of an investigation, it reserves the right to take appropriate action against you.

Concerns may be raised anonymously but you should be aware that anonymity might restrict the ability of Warner to investigate.

### **Informal steps**

Where possible and if appropriate, bullying, harassment and discrimination issues may be resolved informally by first making the person aware that their behaviour is unacceptable and asking that person to stop the behaviour.

If the behaviour continues or if you do not feel able or willing to deal with the issue in this way, you should either report it to your line manager or a member of HR, or, if you are working on a production, you should report it to your Production Executive, Head of Production/Business Director or a member of HR. At this stage, the complaint will be discussed in absolute confidence. However, there may be circumstances where Warner is subsequently obliged to disclose information. This includes, for example, where your complaint leads to disciplinary action against an employee of Warner or where Warner is legally obliged to disclose the information to a third party. Warner may also have an obligation to address the issues discussed even if you later decide not to make a formal complaint.

### **Formal steps**

If it is not appropriate to try to resolve the matter informally or you wish to make a formal complaint, you should do so in writing under Warner's Grievance Policy (if you are an employee) or by contacting HR (if you are a member of Warner's non-employee workforce).

### **ACTION FOLLOWING A FORMAL COMPLAINT OF BULLYING, HARASSMENT OR DISCRIMINATION**

Following a formal complaint, the alleged harasser or bully have a right to be told the details of the allegations against them, so that they can respond. It may be necessary to interview witnesses to any of the incidents mentioned in the complaint. If so, the importance of confidentiality will be emphasised to them.

Where the harasser or bully is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under Warner's Disciplinary Procedure. If the harasser or bully is a third party such as a customer or other visitor, Warner will take what action it reasonably can and would be appropriate to deal with the problem. Whether or not your complaint is upheld, Warner will consider how best to manage any ongoing working relationship between you and the person concerned.

### **SUPPORT FOR THOSE INVOLVED**

Warner offers support to all internal parties involved in any complaint of bullying, harassment or discrimination, through its Employee Assistance Programme (EAP). Further details of the EAP are available from the HR team or your Head of Production/Business Director.

### **HR Contact Details**

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