DRAFT 1: 21 OCTOBER 2026

BATTERSEA REACH
RTM
COMPANY LIMITED

ANTI-DISCRIMINATION, VICTIMISATION & HARASSMENT POLICY

Approved by:
Date adopted:
Next review date:
Policy owner:

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1. Purpose

Battersea Reach RTM Company Limited (the **Company**) is committed to promoting equality, fairness, dignity and respect in all aspects of its activities.

The Company recognises its responsibilities to ensure that its management functions are exercised fairly, impartially and without unlawful discrimination, harassment or victimisation.

The Company adopts a zero-tolerance approach to unlawful discrimination, harassment, victimisation, bullying and intimidation.

The purpose of this policy is to:

- establish clear standards of conduct for directors and others acting on behalf of the Company;
- promote fair and equal treatment of leaseholders, residents and other persons dealing with the Company;
- prevent discrimination, harassment, victimisation and improper retaliation;
- ensure that complaints and concerns are handled fairly and objectively;
- protect individuals who raise legitimate concerns or participate in investigations; and
- maintain confidence in the integrity and impartiality of the Company's management.

2. Scope

This policy applies to:

- all directors of the Company;
- the Company Secretary;
- members of committees and working groups;
- employees and persons acting on behalf of the Company; and
- individuals exercising delegated management responsibilities.

The Company expects its managing agent, contractors, consultants and professional advisers to observe equivalent standards when carrying out work on its behalf.

The Company also expects leaseholders, shared owners, residents and visitors to treat others respectfully when interacting with directors, staff, contractors and other residents.

The Company's ability to take action against individuals will depend on its legal powers, contractual rights and other applicable obligations.

This policy applies to relevant conduct occurring during:

- board and committee meetings;
- general meetings of the Company;
- communications with leaseholders, shared owners and residents;
- correspondence and electronic communications;

- management and maintenance activities;
- complaints and dispute resolution; and
- the exercise of the Company's statutory and contractual functions.

3. Legal Framework

This policy is informed by the Equality Act 2010 and other applicable legislation.

The Equality Act 2010 prohibits discrimination, harassment and victimisation in specified circumstances.

The Act identifies nine protected characteristics:

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

The application of particular statutory protections depends on the circumstances and the relevant provisions of the Act.

The Company shall also have regard to:

- the Companies Act 2006;
- the Commonhold and Leasehold Reform Act 2002;
- the Protection from Harassment Act 1997;
- applicable data protection legislation; and
- relevant landlord and tenant legislation.

Nothing in this policy shall restrict any person's statutory rights.

4. General principles

The Company shall conduct its activities in accordance with the following principles:

- all individuals shall be treated with dignity, fairness and respect;
- decisions shall be based on objective and legitimate management considerations;
- no individual shall receive improper preferential or adverse treatment because of a protected characteristic;

- directors shall exercise their responsibilities impartially and without personal prejudice;
- complaints shall be considered fairly, irrespective of the identity or status of the complainant;
- individuals shall not be penalised for raising legitimate concerns;
- personal disagreements shall not influence the exercise of Company powers;
- reasonable adjustments shall be considered and made where required by law; and
- confidential information shall not be used to intimidate, disadvantage or improperly influence individuals.

5. Direct discrimination

Direct discrimination occurs where a person is treated less favourably because of a protected characteristic, in circumstances covered by the Equality Act 2010.

Examples of potentially unlawful conduct include:

- treating a leaseholder less favourably because of their race or religion;
- refusing to engage with a resident because of their disability;
- applying different standards to residents because of their sex or sexual orientation; and
- making management decisions based on discriminatory assumptions.

The Company prohibits direct discrimination in its activities.

6. Indirect discrimination

Indirect discrimination may arise where a provision, criterion or practice places persons sharing a protected characteristic at a particular disadvantage and cannot be objectively justified under the applicable law.

The Company shall seek to ensure that its policies, procedures and management practices do not create unjustified disadvantages.

Where concerns are identified, the Board shall consider whether reasonable and lawful alternatives are available.

7. Harassment

The Company prohibits unlawful harassment and other unacceptable conduct that undermines the dignity of individuals.

Harassment under the Equality Act 2010 includes certain unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples of unacceptable conduct include:

- offensive or derogatory remarks;
- racist or sexist comments;

- unwanted sexual attention;
- repeated humiliating or intimidating behaviour;
- offensive communications;
- threatening or abusive conduct; and
- deliberate conduct intended to undermine or humiliate another person.

The Company shall take appropriate action where such conduct occurs in connection with its activities, within the limits of its legal powers and responsibilities.

8. Bullying and intimidation

The Company recognises that bullying and intimidation may occur even where conduct does not meet the statutory definition of unlawful harassment.

Bullying may include:

- repeated aggressive or abusive communications;
- deliberate humiliation or personal attacks;
- threats or intimidation;
- persistent unreasonable behaviour intended to undermine an individual;
- misuse of authority to exert improper pressure; and
- deliberate exclusion from processes in which a person is entitled to participate.

Such conduct is prohibited when undertaken by directors or other persons acting on behalf of the Company.

The Company shall distinguish between bullying and the legitimate, proportionate exercise of management responsibilities.

9. Victimisation

Victimisation under the Equality Act 2010 generally involves subjecting a person to a detriment because they have undertaken, or are believed to have undertaken or may undertake, a protected act.

Protected acts include, among other things:

- bringing proceedings under the Equality Act 2010;
- giving evidence or information in connection with proceedings under the Act;
- doing something for the purposes of or in connection with the Act; and
- making an allegation that another person has contravened the Act.

The Company strictly prohibits unlawful victimisation.

In addition, as a matter of Company policy, the Company prohibits improper retaliation against individuals who raise genuine concerns about its management or governance.

This wider protection includes concerns relating to:

- service charge expenditure;
- financial management;
- contractor appointments;
- the conduct of directors;
- the performance of the managing agent;
- building maintenance;
- health and safety;
- compliance with lease obligations; and
- suspected breaches of Company policies.

The Company recognises that not every complaint constitutes a protected act under the Equality Act 2010.

Nevertheless, individuals must not be subjected to improper disadvantage merely because they have raised legitimate concerns.

10. Protection of leaseholders and shared owners

The Company recognises that directors and managing agents may exercise significant influence over matters affecting leaseholders and shared owners.

Such responsibilities must not be used to penalise, intimidate or disadvantage individuals for personal reasons.

In particular, directors and persons acting on behalf of the Company must not:

- subject leaseholders to unjustified adverse treatment because they have criticised the Board;
- use management procedures to retaliate against residents who have raised complaints;
- apply rules selectively for improper personal reasons;
- deliberately withhold information to which a person is legally entitled as a form of retaliation;
- threaten inappropriate enforcement action to discourage legitimate complaints;
- use confidential information to intimidate or embarrass residents;
- allow personal disagreements to influence decisions concerning an individual property; or
- improperly obstruct a leaseholder's exercise of statutory rights.

The Company shall ensure that enforcement decisions are supported by legitimate grounds and are proportionate to the circumstances.

11. Fair and consistent management decisions

The Board shall seek to ensure that decisions affecting individual leaseholders and residents are made consistently, fairly and objectively.

This includes decisions concerning:

- building maintenance;
- access to communal facilities;
- alterations and consent applications;
- complaints and disputes;
- enforcement of lease obligations;
- service charge administration;
- communication with residents; and
- requests for information.

Different treatment may be appropriate where justified by relevant circumstances, legal requirements or reasonable adjustments.

However, personal relationships, disagreements or prejudices must not improperly influence decisions.

12. Conduct of directors

Directors are expected to demonstrate high standards of integrity, professionalism and impartiality.

Directors must:

- treat fellow directors, leaseholders, residents and service providers respectfully;
- avoid discriminatory, abusive or intimidating language;
- refrain from personal attacks during Board meetings or correspondence.
- respect differences of opinion;
- avoid using their position to settle personal disputes;
- declare relevant conflicts of interest;
- maintain appropriate confidentiality;
- support fair and objective decision-making; and
- refrain from improper retaliation against individuals who challenge Board decisions.

Disagreement with a director or criticism of a Board decision shall not, in itself, justify adverse treatment.

13. Conduct of Managing Agents

The Company expects its managing agent to maintain appropriate standards of equality, fairness and professionalism.

The managing agent shall be expected to:

- treat leaseholders and shared owners impartially;
- avoid discriminatory conduct;
- respond professionally to complaints;
- make reasonable adjustments where legally required;
- avoid retaliation against complainants;
- maintain appropriate records;
- escalate serious allegations to the Board; and
- cooperate with reasonable investigations.

The Company shall seek to incorporate appropriate obligations into its managing agent agreement.

Where a complaint concerns the managing agent, the Board shall ensure that it is reviewed by persons sufficiently independent of the matter.

14. Reasonable adjustments and accessibility

The Company recognises that disabled individuals may require reasonable adjustments to access services, facilities, information or procedures.

Where a legal duty to make reasonable adjustments applies, the Company shall comply with that duty.

The Company shall also seek to accommodate reasonable accessibility requests where practicable and appropriate.

Examples may include:

- providing correspondence in accessible formats;
- allowing alternative methods of communication;
- making appropriate adjustments to meeting arrangements;
- considering accessibility requirements when planning works; and
- providing reasonable assistance with relevant management procedures.

Requests shall be considered individually, taking account of legal obligations, practicality and the circumstances.

15. Complaints procedure

Any person who believes that they have experienced discrimination, harassment, victimisation, bullying or improper retaliation in connection with Company activities may raise a complaint.

Complaints should normally be submitted in accordance with the Company's complaints procedure, which is available on the Company's website.

16. Confidentiality and data protection

Complaints and investigations shall be handled with appropriate confidentiality.

Information shall be shared only where there is a legitimate need, including where necessary to investigate allegations, obtain advice, comply with legal obligations or ensure procedural fairness.

The Company shall comply with applicable data protection legislation.

Information concerning protected characteristics or other sensitive personal matters shall receive appropriate safeguards.

Confidentiality shall not be used to conceal unlawful conduct or prevent legitimate reporting to appropriate authorities.

18. Protection against retaliation

No director, employee or person acting on behalf of the Company may improperly penalise, threaten or disadvantage an individual because they have:

- raised a genuine complaint;
- reported suspected discrimination or harassment;
- provided evidence in an investigation;
- exercised statutory rights;
- challenged a management decision through legitimate procedures; or
- reported suspected misconduct.

Any allegation of retaliation shall be treated seriously and may be investigated separately from the original complaint.

19. False or malicious allegations

The Company recognises the importance of protecting individuals against deliberately false or malicious allegations.

Where clear evidence establishes that a person has knowingly made a materially false allegation with malicious intent, the Company may consider proportionate action within its lawful powers.

However, a complaint shall not be regarded as malicious merely because it is unsubstantiated, mistaken or unsuccessful.

No person shall be penalised simply for making a genuine complaint or raising a concern in good faith.

20. Breaches of this policy

Where a breach is established, the Company may take appropriate and proportionate action.

Depending on the circumstances, this may include:

- requiring unacceptable conduct to cease;
- issuing a formal warning or censure;
- removing delegated responsibilities;
- reviewing an affected management decision;
- requiring additional training;
- seeking independent professional advice;
- taking contractual action against a service provider;
- considering action under the Company's Articles of Association; and
- referring potentially unlawful conduct to appropriate authorities.

Any action must be consistent with applicable law, contractual rights and the Company's constitutional powers.

21. Training and awareness

The Board shall take reasonable steps to ensure that directors understand their responsibilities under this policy.

The Company shall make the policy available to directors and relevant persons acting on its behalf.

The Board may arrange additional guidance or training where appropriate.

22. Monitoring and review

The Board shall periodically review the operation of this policy.

The review may consider:

- complaints received;
- patterns of alleged unfair treatment;
- outcomes of investigations;
- identified weaknesses in procedures;
- recommendations for improvement; and
- relevant changes in legislation.

The policy shall be formally reviewed at least annually.

23. Relationship with other policies

This policy shall be read alongside the Company's:

- Conflict of Interests Policy;
- Anti-Bribery and Corruption Policy;

- Complaints Procedure;
- Data Protection Policy; and
- Directors' Code of Conduct.

Where any provision conflicts with mandatory legal requirements, the applicable law shall prevail.

24. Review and amendment

The Board shall review this policy annually, or sooner where required by legislative changes, material changes in the Company's activities or identified governance concerns.

Amendments shall be approved by the Board and recorded in the minutes. Amendments so approved shall be posted to the Company's website within five business days and be put to the next general meeting for further approval. Where such general meeting does not approve such amendments, they shall be deemed to be abrogated with effect from such meeting.

25. Adoption

This policy was approved by resolution of the Board of Directors of the Company on [] 2027.

This policy was further approved by the general meeting of the Company on [] 2027.