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CACI

Sexual Harassment Policy

Prepared for: CACI Employees

Prepared by: Corporate HR

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Document Control

This section details document control in terms of its distribution, configuration management, amendment history and authorisation.

Amendment History

Version	Author & Owner	Date	Changes
1	Dominique Erickson	December 2024	New policy
2	Alison M Brooks	July 2025	General Review
3	Sunaina McDonald	October 2026	ERA Aligned Review

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Definitions/References

Terms	Definitions
ERA	Employment Rights Act 2025

This policy should be read alongside other polices in the RESPECT, SAFETY & CONDUCT Governance Framework:

- **Harassment and Bullying (Dignity at Work) Policy**
- **Equality Diversity and Inclusion Policy**
- **Disciplinary Policy**
- **Grievance Policy**

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Introduction

All employees and workers are entitled to be treated with dignity and respect at work. This includes the right to work in an environment free from sexual harassment and victimisation, where individuals feel safe, supported, and able to raise concerns without fear of retaliation.

Sexual harassment can take many forms and will not be tolerated. Such conduct is unlawful under the **Equality Act 2010 and the Worker Protection (Amendment of Equality Act 2010) Act 2023**. The Company is committed to meeting its legal obligations and adopting best practice in line with current and emerging legislative requirements, including those introduced through the **Employment Rights Act framework.**

CACI is committed to taking **all reasonable and proportionate steps to prevent sexual harassment** and victimisation, fostering a culture of respect, accountability, and speaking up, and maintaining evidence to demonstrate compliance with our legal obligations.

To support this commitment, CACI will undertake periodic sexual harassment risk assessments to identify risks arising from workplace activities, client sites, business travel, work-related social events, remote working arrangements, and interactions with third parties. Action plans arising from these assessments will be documented, assigned to accountable owners, monitored to completion, and reviewed regularly to ensure their effectiveness.

This includes:
Implementing preventive measures such as regular training and clear communication of this policy
Clear, fair and supportive reporting procedures and reporting channels for our employees and third parties to make a complaint about sexual harassment
Creating a culture of respect and inclusion
Taking proactive steps to identify and mitigate risks of sexual harassment

If you have been sexually harassed, or you have witnessed sexual harassment, we encourage you to report it immediately so that we can deal with the matter swiftly. All reports of sexual harassment or victimisation will be investigated which may lead to disciplinary action including, termination of employment.

This policy will be reviewed regularly to ensure it remains effective, legally compliant, and aligned with best practice. The Company will monitor its effectiveness and implement and communicate any changes required to prevent sexual harassment and victimisation.

Scope

This policy applies to all employees and third parties of CACI regardless of gender, sexual orientation, level, function, seniority, status or any other protected characteristic.

CACI will not tolerate sexual harassment from inside or outside of the company. Employees, contractors, customers and anyone interacting with our company, staff and employees are subject to this policy.

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Definition of Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. Sexual harassment also covers treating someone less favourably because they have rejected, submitted to, raised concerns about, reported, witnessed, or supported a complaint relating to unwanted conduct of a sexual nature.

Sexual harassment may be perpetrated by employees, workers, contractors, agency workers, consultants, clients, customers, suppliers, visitors, or any other third party. It can occur in the workplace, whilst working remotely, during work-related travel, training, conferences, social events, client engagements, or any activity connected to work.

Sexual harassment does not need to occur face-to-face. It may take place through any form of communication, including email, telephone calls, text messages, collaboration platforms, social media, messaging applications (such as WhatsApp), video conferencing, or other digital channels.

A person may experience sexual harassment even if they were not the intended recipient of the behaviour. The effect of the conduct on the individual, and all the circumstances of the case, will be considered when determining whether sexual harassment has occurred.

The Company will take all reasonable steps to prevent sexual harassment by employees and all third parties and will not tolerate retaliation against any individual who raises a concern, makes a complaint, participates in an investigation, or supports another person to do so.

Examples of sexual harassment include, but are not limited to:

a) Sexual comments or jokes, which may be referred to as 'banter'
b) Displaying sexually graphic pictures, posters or photos
c) Suggestive looks, staring or leering
d) Propositions and sexual advances
e) Making promises in return for sexual favours
f) Sexual gestures
g) Intrusive questions about a person's private or sex life or a person discussing their own sex life
h) Sexual posts or contact in online communications including on social media
i) Spreading sexual rumours about a person
j) Sending sexually explicit emails, text messages or messages via other social media
k) Unwelcome touching, hugging, massaging or kissing

Definition of Victimisation

Victimisation, in the context of this policy can occur when an individual is treated unfavourably because they have raised, reported, witnessed, supported, or participated in a complaint, investigation, grievance, or legal proceedings relating to sexual harassment. This protection applies whether the complaint is made formally or informally and whether or not the allegation is ultimately upheld. The Company will not tolerate any form of retaliation against individuals who speak up, raise concerns, or support others in doing so.

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The protected acts are:

- Making, intending to make, or supporting a complaint, grievance, allegation, a claim or legal proceedings under the Equality Act 2010.
- Giving evidence, providing information, acting as a witness or otherwise assisting another person in connection with matters arising under the Equality Act 2010.
- Alleging, in good faith, that discrimination, harassment, victimisation or any other breach of the Equality Act 2010 has occurred or may have occurred.
- Raising concerns, reporting suspected misconduct, participating in an investigation, or undertaking any other action connected with the exercise of rights under the Equality Act 2010.

Examples of victimisation may include:

- Failing to consider someone for promotion because they have previously made a sexual harassment complaint.
- Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint.
- Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

Responsibilities and accountabilities for this policy

The CEO has overall responsibility for the operation of this policy but may delegate elements of implementation or decision-making to the Chief Human Resources Officer. Our senior leaders and line managers will maintain an open-door policy and we encourage all employees and third parties to come forward with any concerns in relation to sexual harassment. All employees have a responsibility to behave in line with the requirements of this policy.

Senior Leaders and Line Managers

- Senior leaders and line managers must foster a culture built on mutual respect where all employees feel safe to share their views and raise concerns. CACI expects leaders and line managers to act as role models by consistently demonstrating respectful and inclusive behaviour. This includes being aware of how their own status and actions may impact on others.
- In addition to self-awareness CACI expects and encourages leaders and line managers to regularly seek and act on feedback from their teams and peers regarding an inclusive culture actively engaged in preventing sexual harassment.
- Preventing sexual harassment requires leaders and line managers to communicate that any form of unfair treatment such as sexual harassment will not be tolerated.
- CACI will support and train leaders and line managers so that they are able to foster a culture of open communication and reinforce values based on dignity and respect as this will enable them to understand and resolve issues in their team proactively, quickly, effectively and impartially.

All employees and third parties

- Consider how your behaviour may affect others and amend it accordingly
- Be receptive, rather than defensive, if asked to modify your behaviour

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- Treat colleagues with dignity and respect
- Take a stand if you think inappropriate comments, jokes or behaviour is occurring
- Make it clear to others if you find their behaviour unacceptable
- Intervene, if possible, to stop sexual harassment and give support to others; reporting sexual harassment or potential sexual harassment in the appropriate manner to either your line manager or a senior member of the HR Team

Circumstances covered by this policy

The following table illustrates examples when this policy applies. This is not an exhaustive list.

Examples of behaviours covered by this policy - this is not an exhaustive list
• In the workplace during work-related activities • A situation occurring outside of the normal workplace or normal working hours which is related to work, e.g. a working lunch, a business trip or social functions • Outside of a work situation but involving a colleague or other person connected to CACI, including social media and other digital communications • Against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role • Any other circumstances where the conduct may impact the employment relationship, working environment, dignity of individuals, or the Company's legitimate business interests.

What to do if you are subject to sexual harassment or victimisation

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace. Any allegation of sexual harassment or victimisation will be taken seriously and investigated promptly, thoroughly, and impartially. Where allegations are substantiated, appropriate action will be taken, which may include formal disciplinary action up to and including dismissal for employees, or termination of engagement for workers, contractors, agency workers, or other third parties.

In respect of employees, matters will be considered in accordance with the principles of our disciplinary procedures, a copy of which is available on HIVE.

In respect of third parties matters will be considered in accordance with our disciplinary principles and in addition may include:

- Raising the matter with the third party's employer or organisation
- Removing the individual from Company premises or activities
- Restricting or terminating business contact with the individual
- Reviewing and implementing additional measures to reduce the risk of further incidents

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1. Informal Procedure

We recognise that concerns relating to sexual harassment and victimisation can be sensitive and personal. No individual is required to confront an alleged harasser before reporting a concern or making a complaint.

Where an individual feels comfortable doing so, they may make it clear that the behaviour is unwelcome and must stop, either verbally or in writing. However, where this is not appropriate or desired, support is available.

Any individual who experiences, witnesses, or becomes aware of conduct that may constitute sexual harassment or victimisation is encouraged to seek confidential advice from Human Resources, their manager, or another appropriate Company representative. Concerns will be taken seriously and handled sensitively.

If you are unsure whether particular behaviour may amount to sexual harassment or victimisation, you are encouraged to discuss the matter confidentially with Human Resources. Seeking advice does not oblige you to make a formal complaint, if you do not wish to. Please see the multiple reporting channels section below.

The Company encourages concerns to be raised promptly and will not tolerate victimisation or retaliation against anyone who raises a concern, participates in an investigation, or supports another individual in doing so.

2. Formal Procedure

Multiple Reporting Channels

The Company is committed to providing multiple, accessible channels for reporting concerns of sexual harassment or victimisation. Concerns may be raised with your manager, another manager, Human Resources, a senior leader, or through any designated reporting mechanism.

Reports may be made by individuals who have experienced, witnessed, or become aware of conduct that may breach this policy. There is no requirement to attempt the informal procedure (above) before making a formal complaint.

While the decision to raise a concern will generally rest with the individual, the Company reserves the right to investigate and take appropriate action where necessary to protect employees and maintain a safe, respectful working environment.

The Company will not tolerate victimisation, retaliation, or any detriment against anyone who raises a concern, makes a complaint, participates in an investigation, or supports another person in doing so.

Multiple reporting channels includes:

- **Manager Responsibilities**

  Employees can report concerns directly to their manager or another manager. Managers must proactively identify behavioural, environmental and operational risks that could facilitate sexual harassment and promptly escalate concerns to HRCorporate@caci.co.uk

- **Senior HR Team**

  Senior HR Team members are available should employees feel more comfortable raising concerns or reporting incidents of Sexual Harassment. See contact details at the head of this policy.

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- ### Employee Assistance Programme (EAP)

  We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), 0800 023 2296, this is a confidential 24-hour telephone counselling service, which can be accessed on HIVE.

Reminder - employees and third parties may report concerns through any member of the Senior HR Team, a more senior manager, the Chief HR Officer, or another designated reporting channel.

Reporting details should include:
• The name of the alleged harasser
• The nature of the alleged harassment
• The dates and times when the alleged harassment occurred
• The names of any witnesses
• Any action already taken by you to stop the alleged harassment

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area or suspension with contractual pay until the matter has been resolved.

Investigation

Any complaint of sexual harassment or victimisation will be taken seriously and investigated promptly, fairly, and as confidentially as possible. Investigations will be conducted impartially by an appropriate investigator to establish the relevant facts, with due regard to the rights, wellbeing, and dignity of all parties involved.

Information will only be shared on a strict need-to-know basis. During the investigation, the Company may implement temporary measures where appropriate, including amendments to reporting lines, working arrangements, duties, locations, or, in exceptional circumstances, suspension on full pay.

The investigator will normally meet separately with the complainant, the individual against whom the allegation has been made, and any relevant witnesses. Individuals may be accompanied at investigation meetings by a work colleague or recognised trade union representative.

Following the investigation, a report will be submitted to the appropriate decision-maker who will determine whether further action is required. Where allegations are substantiated, the matter may be addressed under the Company's Disciplinary Policy and may result in disciplinary action up to and including dismissal. Where concerns relate to a third party, appropriate action will be taken to protect those affected and prevent a recurrence.

Regardless of the outcome, the Company will consider what steps are necessary to maintain a safe, respectful, and productive working environment and to support those involved.

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Appeal

If you are dissatisfied with the outcome of the investigation, you may appeal the decision within 14 calendar days of receiving the outcome, by setting out the grounds for appeal in full and submitting your appeal to HRCorporate@caci.co.uk.

The appeal will be reviewed by an appropriate manager who has not previously been involved in the matter and, where practicable, is more senior than the original decision-maker. The appeal manager may review the evidence, undertake any further enquiries considered necessary, and meet with the parties involved where appropriate.

You may be accompanied by a work colleague or a recognised trade union representative of your choice. The appeal outcome will be confirmed in writing as soon as reasonably practicable. The decision reached at the appeal stage is final and concludes the Company's internal procedure.

Third parties do not have a legal right to appeal an internal workplace decision or investigation outcome regarding sexual harassment.

Disciplinary action

Where an allegation of sexual harassment or victimisation is upheld, the matter will be addressed under the Company's Disciplinary Policy. Sexual harassment and victimisation are regarded as serious misconduct and may result in disciplinary action up to and including summary dismissal.

When determining the appropriate outcome, the Company will consider the seriousness of the conduct, its impact, any pattern of behaviour, and any aggravating or mitigating factors. Aggravating factors may include abuse of power, seniority or trust, repeated behaviour, retaliation against a complainant or witness, or attempts to interfere with an investigation.

Where the perpetrator is a third party, the Company will take appropriate action to protect those affected and prevent a recurrence, including restricting access to Company premises or raising a complaint directly with the third-party employer, where appropriate.

Any employee subject to disciplinary action will have the right of appeal in accordance with the Company's Disciplinary Policy.

What to do if you witness sexual harassment or victimisation

All employees, workers, contractors and agency workers are encouraged to speak up if they witness, become aware of, or have concerns about potential sexual harassment or victimisation.

Where it is safe and appropriate to do so, you may challenge the behaviour, support the individual affected, encourage them to report the matter, or raise the concern yourself.

Concerns should be reported to a senior member of the HR team as soon as possible by emailing HRCorporate@caci.co.uk.

All concerns will be handled sensitively by a senior member of the HR team.

No individual will be subjected to victimisation or retaliation for raising a concern or participating in an investigation in good faith. Deliberately false or malicious allegations may be addressed under the Company's Disciplinary Policy.

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Protection for those raising ~~making~~ complaints or participating in ~~an~~ investigation

The Company encourages individuals to raise concerns and participate in investigations relating to sexual harassment and victimisation. Anyone who makes a complaint, provides information, acts as a witness, or participates in an investigation in good faith will be protected from victimisation, retaliation, intimidation, or any other detriment.

Any concerns about such treatment should be reported to Human Resources or raised under the Company's Grievance Policy.

Concerns raised in good faith will be treated seriously, regardless of the outcome. However, knowingly false allegations or bad-faith complaints may result in disciplinary action under the Company's Disciplinary Policy.

Harassment by Third Parties

CACI adopts a zero-tolerance approach to harassment by customers, clients, suppliers, contractors, visitors and other third parties. Appropriate preventative measures will be implemented where risks are identified, including escalation arrangements, site-specific controls, reporting mechanisms, warning processes and, where necessary, restricting or terminating commercial relationships.

Support and Guidance

Employees are encouraged to raise concerns of seek advice via one of the multiple reporting channels above. If unsure, please contact HRCorporate@caci.co.uk

Employee Assistance Programme

We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), 0800 023 2296, this is a confidential 24-hour telephone counselling service, which can be accessed on HIVE.

Record Keeping

Appropriate records will be maintained to evidence preventative measures, investigations, training, risk assessments and corrective actions.

Confidentiality

Confidentiality is an important aspect of this policy. All individuals involved in raising, receiving, investigating, or responding to concerns of sexual harassment or victimisation must handle information sensitively and maintain appropriate confidentiality. Information will only be shared on a need-to-know basis or where required by law.

Any breach of confidentiality or unauthorised disclosure of information relating to a complaint or investigation may be treated as a disciplinary matter under the Company's Disciplinary Policy.

Training

We provide mandatory training to all senior management. Additional role-based training will be provided to managers, investigators, HR practitioners and senior leaders. In addition, we provide mandatory annual training to all staff on sexual harassment to ensure there is a clear understanding of:

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- what sexual harassment is, how it may occur and that it will not be tolerated
- expected levels of behaviour
- how they can report any incidents of having been sexually harassed or having witnessed it
- how acts of harassment will be dealt with under the disciplinary procedure, which can potentially result in dismissal.

We ensure that all levels of management are trained on implementing this policy, including preventing and managing sexual harassment in the workplace and the procedure to follow if an allegation is reported. We will regularly review the effectiveness of our training.

Monitoring and Governance

This policy reflects the law and the Company's practice. See document control section of this policy for monitoring and review periods.

The Chief HR Officer will provide periodic reporting to Executive Leadership regarding:

- Formal complaints
- Informal concerns and trends
- Training completion rates
- Risk assessment outcomes
- Third-party incidents
- Corrective actions implemented

Review of Policy

This policy will be reviewed annually to ensure its effectiveness and compliance with current legislation and following any significant incidents.

This policy does not form part of your employment contract. The Company reserves the right to amend this policy at any time to reflect changes in legislation, regulatory requirements or business needs.

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