

Customer Conduct Policy

Spicerhaart Group



1. Introduction

- 1.1 Spicerhaart Group ("**Spicerhaart**") is committed to providing a professional, safe, respectful and inclusive environment for its employees, workers, contractors, customers, clients and business partners. We are committed to preventing harassment, including sexual harassment, and to protecting our colleagues from inappropriate conduct by third parties.
- 1.2 This policy applies to interactions in the workplace and in any work-related setting, including customer meetings, property viewings, valuations, inspections, branch visits, business travel, work-related events and digital communications.
- 1.3 We recognise that customers may at times be frustrated, disappointed or dissatisfied and are entitled to raise concerns, complaints and feedback. However, we will not tolerate conduct that is abusive, threatening, discriminatory, intimidating, harassing or otherwise inappropriate.
- 1.4 Spicerhaart is committed to taking reasonable steps to prevent harassment (including sexual harassment) of its employees, workers and representatives by third parties and to taking appropriate action where such conduct occurs.
- 1.5 This policy explains the standards of behaviour expected when interacting with Spicerhaart and the action we may take where those standards are not met.
- 1.6 The policy forms part of Spicerhaart's commitment to protecting colleagues from harassment (including sexual harassment) and maintaining a safe working environment. It supports the Company's obligation under equality, health and safety, and employment legislation.

2. Scope

- 2.1 This policy applies to customers, prospective customers, clients, tenants, landlords, buyers and sellers, contractors and consultants, suppliers, visitors, and any other person interacting with Spicerhaart, its colleagues or representatives.
- 2.2 It applies to all interactions with Spicerhaart, including face-to-face meetings, property viewings, valuation appointments, branch visits, telephone conversations, emails, letters, text messages, social media, online meetings, and any other form of communication.

3. Expected Standards of Conduct

- 3.1 We expect everyone who interacts with Spicerhaart to treat our colleagues and representatives with courtesy, dignity and respect.
- 3.2 We recognise that individuals may express dissatisfaction, frustration or disagreement. Legitimate complaints, robust discussions and constructive criticism do not, by themselves, amount to unacceptable conduct.

4. Unacceptable Conduct

- 4.1 Spicerhaart will not tolerate unacceptable conduct directed towards its colleagues or representatives.
- 4.2 Examples include:
 - (a) **Violence and Threats:** physical violence; attempted physical violence; threatening behaviour; intimidation; threats of harm; threatening remarks intended to cause alarm or distress.

- (b) **Harassment and Sexual Harassment:** unwanted sexual comments, jokes or remarks; intrusive questions of a personal or sexual nature unwanted physical contact; sexual advances; sexually suggestive comments or messages; sexually suggestive gestures; stalking behaviour; repeated unwanted contact; displaying or sending sexual images or material; conduct that creates an intimidating, hostile, degrading, humiliating or offensive environment.
- (c) **Discrimination:** racist comments; sexist comments; homophobic, biphobic or transphobic comments; discriminatory conduct relating to disability, religion, age or any other protected characteristic; offensive stereotypes or derogatory remarks.
- (d) **Abuse:** personal abuse; offensive language; aggressive shouting; swearing directed at individuals; bullying behaviour; harassment of colleagues online or in person.
- (e) **Misuse of Communications Channels:** publishing personal information relating to colleagues; contacting colleagues through personal social media accounts; abusive online commentary; targeted online harassment.
- (f) **Retaliation:** victimisation; retaliation; intimidation or adverse treatment directed towards any individual because they have raised a concern, made a complaint, reported misconduct or participated in an investigation.

4.3 The above examples are not exhaustive. Spicerhaart may determine that other conduct is unacceptable having regard to the circumstances.

5. Property Viewings, Valuations and Home Visits

- 5.1 Spicerhaart employees and representatives regularly attend properties, conduct viewings, undertake valuations and meet customers in person.
- 5.2 Customers must ensure that these interactions are conducted in a safe and respectful manner.
- 5.3 Any inappropriate, threatening, discriminatory, harassing or sexually inappropriate conduct during a viewing, valuation, inspection or other appointment may result in the appointment being terminated immediately and further action being taken by Spicerhaart in accordance with this policy.

6. How we may Respond

- 6.1 Where unacceptable conduct occurs, Spicerhaart may take such action as it considers reasonable and appropriate.
- 6.2 Depending on the circumstances, this may include:
 - (a) asking the individual to stop the conduct immediately;
 - (b) ending a telephone call;
 - (c) ending a meeting or property viewing;
 - (d) requiring an individual to leave Company premises;
 - (e) refusing entry to premises;
 - (f) restricting future communications;

- (g) requiring communications to be conducted through a particular channel;
- (h) reallocating appointments;
- (i) cancelling appointments;
- (j) refusing to provide services where legally permissible;
- (k) removing online content;
- (l) reporting conduct to the police or other authorities;
- (m) taking legal action; and/or
- (n) terminating commercial or business relationships.

6.3 In determining what action to take, Spicerhaart may consider the nature and seriousness of the conduct, whether it was repeated, its impact on employees or representatives, the risk of recurrence and any relevant legal, regulatory or health and safety considerations.

7. Protection of Colleagues

7.1 Any incident involving violence, threats, harassment, sexual harassment, discrimination or abuse may be recorded and investigated.

7.2 Spicerhaart may take reasonable steps to protect colleagues, including implementing warning markers on customer records, requiring accompanied appointments, reallocating appointments, restricting contact arrangements, limiting communications to specified channels, implementing lone-working controls, refusing future appointments or taking any other protective measures considered appropriate.

7.3 Spicerhaart may retain records relating to incidents, investigations and actions taken under this policy where reasonably necessary to protect colleagues, investigate concerns or comply with legal obligations. Personal data will be processed in accordance with Spicerhaart's Privacy Policy.

7.4 Spicerhaart will endeavour to handle reports sensitively and confidentially, although information may need to be shared where reasonably necessary to investigate concerns, protect individuals, comply with legal obligations or protect health and safety.