

Anti-Harassment Statement

Rothestay - Our Commitment to a Working Environment Free from Harassment.

Our Commitment

Rothestay is committed to providing a working environment free from harassment, sexual harassment and victimisation for all of our staff and everyone we work with, including clients, customers, counterparties, suppliers and other third parties. That commitment is explicitly set out in our Anti-Harassment Policy.

We strive to ensure that all of our staff are treated, and treat others, with dignity and respect – both inside and outside of the workplace. Harassment, sexual harassment and victimisation are unlawful under the Equality Act 2010 and will not be tolerated, whether perpetrated by our staff or by third parties.

Our Group includes UK regulated entities – Rothestay Life plc and Riverton Home Finance Limited. We recognise that maintaining high standards of conduct - including in relation to non-financial misconduct - is integral to sound risk management, good governance, and the trust that underpins the financial services sector. This statement sets out our expectations and the steps we are taking to prevent harassment and sexual harassment.

What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It may involve conduct of a sexual nature (sexual harassment — see below), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment may include, for example, discriminatory jokes or remarks, threatening to disclose someone's sexual orientation or gender identity, offensive emails or messages, or mocking a person's disability.

Harassment can occur both inside and outside the workplace, such as on business trips, at work-related events or social functions, or on social media. Even if it was not the intended purpose of the harasser to violate a person's dignity or to create a negative environment for them, if that is the effect of the unwanted conduct, then it will amount to harassment.

What is Victimisation?

Under the Equality Act 2010, victimisation includes subjecting a person to a detriment because they have done, or are suspected of doing or intending to do, a "protected act". Protected acts include: bringing proceedings under the Equality Act 2010; giving evidence or information in connection with proceedings under the Act; doing anything for the purposes of or in connection with the Act; and making an allegation (whether or not express) that a person has contravened the Act. It is unlawful to mistreat, punish, or put someone at a disadvantage because they have done any of these things.

Legal and Regulatory Framework

Our approach is grounded in the following legal and regulatory framework:

The **Equality Act 2010** prohibits harassment, sexual harassment and victimisation and provides the foundational definitions for these concepts under UK law.

The Worker Protection (Amendment of Equality Act 2010) Act 2023, which came into force on 26 October 2024, introduced a proactive duty on employers to take reasonable steps to prevent sexual harassment of their employees in the course of their employment (including harassment by third parties).

The **Employment Rights Act 2025** strengthens this duty further. Effective October 2026, employers must take "all reasonable steps" to prevent sexual harassment and may be liable for third-party harassment. In addition, from 6 April 2026, disclosures relating to sexual harassment constitute qualifying disclosures attracting whistleblowing protection.

The **Financial Conduct Authority and Prudential Regulation Authority** have made clear that harassment constitutes non-financial misconduct and is a matter of regulatory concern. From 1 September 2026, a new rule in the FCA's Code of Conduct (COCON) explicitly brought serious non-financial misconduct - including sexual harassment between colleagues, within the scope of the Conduct Rules for all authorised firms.

The **Equality and Human Rights Commission ("EHRC")** has power to take enforcement action where employers fail to comply with their duty to take reasonable steps to prevent sexual harassment, including where the harassment is perpetrated by third parties. The EHRC has published guidance dealing with compliance with the preventive duty.

Scope - Who This Applies To

This statement applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, and interns. It covers all areas of our business including any overseas sites, subject to applicable local laws. It also sets out our expectations of all external third parties with whom we interact in the course of our business, including but not limited to clients, customers, counterparties, suppliers, or other third parties we work with.

What We Expect of Those We Work With

We ask that all individuals and organisations we work with share our commitment to a working environment free from harassment and sexual harassment. Specifically, we expect our clients, customers, counterparties, suppliers and other third parties we work with, to treat our staff with dignity and respect at all times. Any form of harassment or sexual harassment directed at our staff is unlawful and will not be tolerated.

We also expect our clients, counterparties, suppliers and other third parties that we work with to be aware of and compliant with their own obligations, and to have taken steps within their own organisations to prevent harassment and sexual harassment.

Reporting and Response

If our people experience, witness, or become aware of any incident of harassment or sexual harassment we encourage them to report it promptly to their line manager or the HR Department as soon as they are able to. Rothesay maintains a range of disclosure channels for people to report concerns, including anonymous reporting and whistleblowing.

External parties can contact us using the 'Get in touch' page of our website.

We commit to taking all concerns raised seriously and will act promptly to carry out appropriate action. Complaints will be investigated in a timely, respectful, and confidential manner in accordance with our Anti-Harassment Policy. Anyone found to have retaliated against or victimised someone for raising a concern in good faith will be subject to disciplinary action under our Disciplinary Procedure.

Where an incident of harassment or sexual harassment by a third party is substantiated, Rothesay will take appropriate action. This may include warning the harasser about their behaviour, banning them from our premises, terminating their engagement, reporting any criminal acts to the police, and sharing information with other branches of the business. Any reporting obligations to the FCA and/or PRA will be fulfilled as may be required.

Our Ongoing Commitment

We commit to reviewing this statement at least annually. We will also monitor its effectiveness and implement any changes that may be required in the interim to ensure that our policies, training, and procedures reflect best practice and the evolving legal and regulatory landscape.

We will take steps to identify and mitigate the risk of sexual harassment in our workplace, including sexual harassment by third parties.

We will take proactive measures to prevent future instances of harassment and sexual harassment, including by providing regular training to our staff on the prevention of harassment and sexual harassment and on their rights and responsibilities.

We expect those we work with to do the same within their own organisations.

We are grateful for the cooperation of our clients, customers, counterparties, suppliers and other third parties we deal with, in supporting a working environment in which everyone is treated with dignity and respect. Together, we can ensure that our working relationships are conducted to the highest standards of integrity and professionalism.