

**Policy Control**

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| POLICY NO.     | 3.1                                      |
| NAME           | ANTI-HARESSMENT AND ANTI-BULLYING POLICY |
| DATE OF ISSUE  | 17 <sup>th</sup> April 2023              |
|                |  |
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| Approved by:   | Management Board                         |
| Approval Date: | 8 <sup>th</sup> August 2018              |

**Version Control**

| <b>Version No.</b> | <b>Date</b> | <b>Changes made by</b> | <b>Changes Details</b> |
|--------------------|-------------|------------------------|------------------------|
| 3.0                | 09.08.2018  | N/A                    | New Policy             |
| 3.1                | 17.04.2023  | Tiana Vella            | All Policy             |
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## VON DER HEYDEN GROUP

### 1. Scope

Von der Heyden Group (VDHG) is committed to providing a safe and respectful workplace for all employees. We do not tolerate any form of harassment, discrimination or retaliation.

This policy applies to all employees, including supervisors, managers, outsourced workers and suppliers and outlines the organizations' expectations for behaviours in the workplace. This policy also applies to all work-related activities, including off-site events and business trips.

### 2. Declaration of Principles

At VDHG, we firmly believe that harassment and bullying in any form is a violation of workers' dignity and is unacceptable. As part of our commitment to good management, we strive to create a workplace environment that is respectful and dignified for all employees. We recognize that individuals who experience harassment and/or bullying may suffer emotional and physical stress, as well as a negative impact on their job performance.

Failing to address harassment and bullying can also have negative consequences for our organization, including reduced morale among employees, increased absenteeism and job turnover, and decreased job performance.

As an equal opportunity employer, VDHG expects all parties, including management, to uphold and safeguard the principles outlined in this policy document. Any failure to comply with this policy will be met with severe consequences.

### 3. Definition of Workplace Harassment

Harassment at the workplace refers to any unwelcome behaviour or conduct that is based on a person's protected characteristic, such as race, age, sexual orientation, religion, disability, gender/sexual, or any other characteristic protected by law.

Harassment can take various forms, including verbal or written comments, physical conduct, visual displays, or gestures that are offensive, intimidating, hostile, or humiliating. It can also involve unwanted sexual advances, requests for sexual favours, or other unwelcome conduct of a sexual nature.

Harassment creates an intimidating, hostile, or offensive work environment that can interfere with an employee's ability to perform their job duties and can result in emotional and physical stress.

#### 3.1 Types of Harassment (list is not exhaustive)



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### 3.1.1

*Race harassment* is a form of workplace harassment that is based on an employee's race, ethnicity, or national origin. It involves unwelcome behaviour or conduct, such as but not limited to, offensive remarks, derogatory comments, racial slurs, racially charged jokes or insults, and physical intimidation.

### 3.1.2

*Sexual/gender harassment* is a serious issue in the workplace, and it can take many forms. It involves unwelcome behaviour of a sexual nature or other sex-based conduct that affects the dignity of both women and men. It's important to note that employees may not always realize that their behaviour constitutes sexual harassment, but they must recognize that what is acceptable to one person may not be acceptable to another.

It's also important to understand that sexual harassment is not the same as consensual sexual interaction, flirtation, attraction, or friendship. For sexual harassment to occur, the conduct in question must be unwelcome.

There are several different types of sexual harassment, including physical conduct of a sexual nature, verbal conduct of a sexual nature, non-verbal conduct of a sexual nature, sex-based conduct, and sexual blackmail.

*Physical conduct* of a sexual nature: commonly regarded as meaning unwanted physical conduct ranging from unnecessary touching, patting or pinching or brushing against another employee's body to assault and coercing sexual intercourse at the place of work.

*Verbal conduct* of a sexual nature: this may include unwelcome sexual advances, propositions or pressure for sexual activity; continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome; offensive flirtations, suggestive remarks, insensitive jokes, innuendoes or lewd/obscene comments.

*Non-verbal conduct* of a sexual nature: refers to the display of pornographic or sexually suggestive pictures, objects or written materials, and making sexually suggestive gestures.

*Sex-based conduct*: refers to conduct that denigrates or ridicules or is intimidatory or physically abusive of an employee's gender, such as derogatory or degrading abuse or insults that are gender related and offensive comments about appearance or dress. Such conduct can create an offensive working environment for the recipient.

*Sexual blackmail (Abuse of authority)*: refers to conduct where an employee's refusal or submission to unwanted sexual behaviour is used as a basis for a decision which affects that employee's access to



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employment, continued employment, training, salary, and promotion opportunities. This form of behaviour involves abuse of authority as only somebody holding direct or indirect (that is capable of influencing) supervisory or managerial authority has the power to threaten or actually take an employment decision affecting the person harassed.

### 3.1.3

*Religion harassment* is a form of workplace harassment that is based on an employee's religious beliefs or practices. It involves unwelcome behavior or conduct, such as offensive remarks, derogatory comments, insulting or belittling comments, mocking or ridicule, or exclusion from job-related activities based on religion.

### 3.1.4

*Disability harassment* is a form of workplace harassment that is based on an employee's disability or perceived disability. It involves unwelcome behaviour or conduct, such as offensive remarks, derogatory comments, insulting or belittling comments, mocking or ridicule, or exclusion from job-related activities based on disability.

### 3.1.5

*Age harassment* involves unwelcome behaviour or conduct, such as verbal offensive remarks like age-related jokes, excluding employees from certain job-related activities, meetings or trainings based on their age or perceived ability to contribute effectively to such activities, negative stereotyping, such as assuming that older workers are less technologically savvy or less productive than younger workers and incidents of negative treatment, humiliation, or intimidation that are targeted at an employee because of their age.

The above list is not an exhaustive list and should not be considered as such. Harassment is prohibited by law and is a violation of an employee's civil rights.

## 4. Definition of Workplace Bullying

Workplace bullying can take many forms, ranging from relatively mild behaviours such as being ignored or excluded, to more severe and persistent behaviours such as verbal abuse or physical assault. The behaviour is often repeated over time, causing the victim to feel intimidated, degraded, or humiliated, and can lead to a decline in work performance and job satisfaction. The bullying behaviour is typically targeted towards individuals who are perceived as being weaker or more vulnerable than the bully, such as new employees, those with disabilities, or those who are members of a minority group.

Bullying can be a very subtle behaviour and may initially be disguised as constructive criticism or feedback. However, over time the behaviour becomes more aggressive, and the victim may begin to



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feel like they are being singled out or unfairly targeted. Examples of bullying behaviour can include constant criticism, belittling comments, being shouted at or sworn at, exclusion from work-related activities or meetings, or having one's work constantly monitored or scrutinized. Bullying can also involve spreading rumours or malicious gossip about the victim, making it difficult for them to form positive relationships with other employees.

### 5. Reporting and Investigating an Incident – Procedure

The following procedure outlines the steps to take if you believe you have been harassed or bullied in the workplace:

#### Step 1: Reporting an Incident

If you have experienced or witnessed harassment or bullying in the workplace, it is important to report the incident as soon as possible. You can do this by speaking to your superior or directly to the Director of HR. You may also report the incident to an external authority, such as law enforcement, if the harassment or bullying violates applicable laws.

Major incidents report should be made in writing and shall include:

- The name of the person making the complaint
- The name of the alleged harasser
- The nature of the alleged harassment
- Dates and times when the alleged harassment occurred
- Name of potential witness to the alleged incident
- Any action taken by the complainant to stop the alleged harassment

The complaint, once signed by the complainant, should be sent, in confidence, to the Director of HR (vella@vdhgroup.com).

#### Step 2: Confidentiality and Non-Retaliation

We take all reports of harassment and bullying seriously and will conduct an investigation into the incident. Confidentiality will be maintained to the fullest extent possible, consistent with our legal obligations and the need to conduct an effective investigation.

We also have a strict non-retaliation policy. Any employee who reports harassment or bullying in good faith or participates in an investigation will not face retaliation. Retaliation against individuals who report harassment or bullying is strictly prohibited and will result in disciplinary action.

#### Step 3: Investigation and Corrective Action



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Once a report has been made, we will conduct a thorough investigation into the incident. This may involve interviewing witnesses, reviewing relevant documentation, and gathering any other relevant information.

If it is determined that harassment or bullying has occurred, we will take appropriate corrective action. This may include disciplinary action up to and including termination. We will also take steps to prevent further instances of harassment or bullying from occurring in the future.

### 6. Discipline

Employees who violate this policy are subject to appropriate discipline. If an investigation results in a finding that this policy has been violated, disciplinary action will be taken. The minimum discipline is a written reprimand. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

### 7. Confidentiality

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. However, the identity of the complainant is usually revealed to the respondent and witnesses. The Director of HR takes adequate steps to ensure that the complainant is protected from retaliation during the period of the investigation. All information pertaining to a sexual harassment complaint or investigation is maintained by the Director of HR in secure place. The Director of HR can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

### 8. Conclusion

Our organization is committed to maintaining a work environment that is free from harassment and bullying. By reporting incidents promptly and providing as much detail as possible, we can ensure that appropriate action is taken to address any issues that arise.