Caldic Global Anti-Harassment Policy

Purpose and values

Caldic is committed to provide a fair, safe and harmonious work environment in which all employees feel valued and safe, where they are treated with respect and dignity and provided equal opportunity. If employees experience any form of undesirable behavior, it is important for Caldic that they speak up without the risk of retaliation.

This Global Anti-Harassment Policy sets out the principles of what we consider a safe work environment.

The way we work on a day to day basis is essential for a safe work environment. Therefore, Caldic will promote its values on an active basis and will provide training. Each person working on behalf of Caldic should be leading by example.
Harassment distracts from a productive working environment and can impact the health, confidence, morale and performance of those affected by it, including anyone who witnesses or has knowledge of the unwanted or unacceptable behavior.

Scope and amendments

This Policy applies to all Caldic employees within the group regardless level or responsibility. This includes all members of the Caldic workforce around the world (employees and contractors of all Caldic businesses and subsidiaries worldwide) and members of the Caldic Board of Directors.

Caldic may change or supplement this Policy at any time. Employees are bound by such changes as of the date of change. All previous versions of this Policy will then be cancelled.

Definition of harassment

Harassment includes a wide spectrum of behaviors which makes an individual feel unsafe and/or affects the dignity of anyone at work or creates an intimidating, hostile, degrading, humiliating or offensive environment.

This behavior can be based on gender, sexual orientation, marital or civil partnership status, family status, gender reassignment, religion or belief, age, race, ancestry, place of origin, color, ethnic origin, citizenship, creed, record of offences, disability or any other inappropriate basis. It can also be bullying or deliberately excluding an individual, and/or mocking a person for whatever reason.

A single incident of unwanted or offensive behavior can amount to harassment.
Harassment is usually broken down in four categories:

1. Verbal or written
2. Physical
3. Non-verbal
4. Visual

The below examples are just illustrative and not exhaustive. While these examples may illustrate harassment of a person based on certain characteristics, the examples can be applied to any characteristic.

1. Verbal or written

- Offensive language, defamatory remarks, gossip or threats
- Sexual comments about clothing, personal behavior or a person's body language

- Sexual jokes
- Sending suggestive e-mails or text messages
- Requesting sexual favors
- Repeatedly asking someone out on a date
- Inquiring someone's sexual orientation or sexual history
- Making remarks about someone gender identity

2. Physical

- Touching, pushing, grabbing, punching
- Blocking a person's physical movement or invading an individual's personal space
- Inappropriate or uninvited touching of a person or their clothing
- Kissing, hugging, stroking or rubbing
- Purposefully brushing up against another person

3. Non-verbal

- Staring in a sexually suggestive or offensive manner
- Offensive gestures or facial expressions of a sexual nature
- Following or stalking a person

4. Visual:

- Posters, drawings, pictures or emails that are sexual in nature
- Sharing sexual images or videos
- Sending or displaying of material that is pornographic or obscene, including e-mails, text messages, videos, photographs, posters, emblems or any other offensive material

Definition of bullying
Bullying is intimidating or insulting behavior, which, through the abuse of power, makes the recipient feel upset, threatened, humiliated or vulnerable.

Bullying can be a form of harassment and can undermine an individual's self-confidence and self-esteem and cause them to suffer stress.
Bullying can take the form of physical, verbal and non-verbal conduct. As with harassment, there are many examples of bullying, which can include:

- Shouting at or humiliating others
- High-handed or oppressive levels of supervision
- Unjustified, offensive and/or insulting remarks about performance
- Excluding employees from meetings, events or communications without good cause
- Inappropriate posts or comments on or via social media commonly known as "cyber bullying"
- Physical or emotional threats

Bullying can occur in the workplace and outside of the workplace at events connected to the workplace, such as social functions or business trips.

Harassment and bullying will hereinafter be referred to as "**Harassment**".

It should be noted that it is the impact of the behaviour that is relevant and not solely the motive or intent behind it.

What does Caldic expect from you?

Caldic expects from you that you are mindful of how words and actions impact others, regardless of your intentions. Doing so supports a respectful workplace. Speak up when you are witness of harassment and/or offer support to someone who seems to be a victim of harassment.

What should you do if you have a question or concern?

If you experience or notice any form of Harassment or if you feel a matter has not been dealt with fairly or in an appropriate manner, Caldic encourages you to speak up in any way that feels right to you under the given circumstances and taking into account the local procedures.

In every country, you can reach out to your manager, to your local Human Resources or Legal & Compliance at any time.

You can also use the Caldic Speak Up Tool **[1800-88-4307].**

The Speak Up tool provides you the opportunity to speak with an operator in your local language. The Speak Up Tool can be accessed via the Caldic Portal as well. For more details we refer to the our Speak Up policy which can also be found on our Legal and Compliance Portal on our intranet.

In several countries where Caldic operates, an independent/external confidential advisor has been established.
A confidential advisor can assist, guide and advise you and if necessary refer you to a professional caregiver. Furthermore, a confidential advisor can also support you in possible further actions (such as filing a complaint), and providing after-care. Caldic guarantees that a confidential advisor operates fully independent.
[Contact Tel: 8051 6203 Ext. 300 and handle strictly confidential]

Whichever way you choose to report your concern, you can be confident that Caldic take all reported concerns very seriously and will act in accordance with the applicable privacy legislation (including GDPR in Europe).

Caldic is committed to a zero-tolerance policy when it comes to reporting. This mean if you report a concern in good faith or if you seek clarification on any decision, there will never be any retaliation.

Grievance Procedure

Sometimes, just talking is not enough. Then you can always file a complaint via the Caldic Speak Up Tool **[1800-88-4307].**

In any case all reports of harassment or violence in the workplace will be investigated by an independent committee that will be established based on the local policy.

Starting principles are:
1. ensuring a carefully designed plan of investigation and proper documentation of the entire process;
2. following the internal guidelines and policy;
3. taking into account the principles of proportionality and subsidiarity towards all persons involved;
4. with regard to the privacy: limiting the scope of the investigation;
5. acting expeditiously but carefully;
6. taking measures to protect the interests of the individual employees who have complained. This means that these employees should not be exposed to negative consequences due to their notification;
7. suspending an employee who is being complained about during the investigation might be an option, but be aware of the negative impact if it appears the harassment cannot be proven;

8. as soon as sufficient facts and details are available for a reasonable suspicion: providing the employee the opportunity to present his opinion and to involve this opinion in the report of the investigation.

Disciplinary actions

Employees against whom a compliant is substantiated will be appropriately disciplined. This Policy will be applied irrespective of seniority or function.

The concrete sanction will depend on the nature and seriousness and on the local legislation and may vary from a verbal or written warning up to termination of employment.

Local Human Resources advises on the appropriate sanction and is supported by an external legal advisor when necessary.

Local additions to the Code

Training

- All new employees will receive this Policy in their onboarding package
- All managers and supervisors will receive yearly training (to be developed and implemented)

Acknowledgement of success / make improvement

- Group HR will review this Policy on an annual basis and identity any gaps and make changes when necessary.