



ANTI-HARASSMENT POLICY

REVIEW No. 0
DATE: 15-05-20
PAGE 1 of 8

COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

INDEX:

I. OBJECTIVE.....	2
II. SCOPE	2
III. DECLARATION OF PRINCIPLES	2
IV. LEGAL BASIS.....	2
V. DEFINITIONS	2
Harassment.....	2
Workplace.....	3
VI. SEXUAL HARASSMENT	3
SCOPE/ COVERAGE.....	4
FORMS OF SEXUAL HARASSMENT.....	4
HARASSMENT CAN OCCUR	4
WHAT IS NOT HARASSMENT?	4
VII. MORAL HARASSMENT	5
WHAT IS MORAL HARASSMENT?	5
HOW TO RECOGNIZE MORAL HARASSMENT?.....	5
WHAT ARE THE CONSEQUENCES OF MORAL HARASSMENT AT WORK?	5
ON WITNESSES INSIDE THE ORGANIZATION.....	6
ON THE ORGANIZATION.....	6
VIII. PREVENTING MEASURES	6
IX. PROCEDURE OF ACTION	6
X.- PROCEDURE OF INVESTIGATION	7



ANTI-HARASSMENT POLICY

REVIEW No.	0
DATE:	15-05-20
PAGE	2 of 8

COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

I. OBJECTIVE

This Policy is expected to be able to provide guidance to employers, employees, vendors, suppliers, workers at GRUPO ANTOLIN on preventing and effectively responding to workplace harassment.

II. SCOPE

This Policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites.

III. DECLARATION OF PRINCIPLES

The Company will not tolerate any form of harassment, if engaged in by clients or by suppliers or any other business associates. Furthermore, this policy shall be used as an instrument to raise awareness and education in preventing harassment in the workplace.

In accordance with this commitment, GRUPO ANTOLIN establishes a procedure and declare the following statements:

- Any form of harassment is against the dignity of people.
- Zero tolerance towards any kind of harassment.
- Any type of harassment is strictly forbidden.
- The company protects the victims of harassment.
- All employees, especially managers, have the obligation to help and guarantee an open working environment for everybody to feel safe in.

IV. LEGAL BASIS

The drafting of this Policy is based on international standards and relevant legislations.

V. DEFINITIONS

Harassment

Harassment frequently involves an abuse of power where the targets can experience difficulties in defending themselves. *Harassment at the workplace is any unwelcomed and offensive action, repeated and unreasonable act, addressed to a worker or a group of workers that causes difficulty in the performance of an assigned job or causes a worker to feel that he/she is working in a hostile working environment.* This can also cause risk to the health and safety of the worker.



ANTI-HARASSMENT POLICY

REVIEW No.	0
DATE:	15-05-20
PAGE	3 of 8

COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

Workplace

Workplace means a physical place where every room or field, close or open, movable or stationary, where workers work, or is frequently entered by a worker for business and where there is a sources of danger, including all rooms, fields, lawns and surrounding areas that constitutes parts of, or are connected with the place of work.

From the above definition, a workplace does not only include physical places where work is performed during the eight working hours per day, such as office or factory. Workplace also includes all locations where employment-related business is conducted as a result of employment responsibilities or employment relationship, in locations such as work-related social functions, conference and training sessions, official business travel and lunches, dinner, or promotional campaigns organized for client or partners, telephone conversations, and communications through electronic media. Therefore, workplace includes not only the physical room where work is performed for eight hours per day, but also all working hours outside of the eight-working hours in the locations outside of an office physical room.

VI. SEXUAL HARASSMENT

Sexual harassment is **any unwanted** conduct of a sexual nature, request for sexual favours, verbal or physical conduct or gesture of a sexual nature; or other behavior of a sexual nature that makes the recipient feels humiliated, offended and/or intimidated, where such reaction is reasonable in the situation and condition; or made into working requirement or create an intimidating, hostile or inappropriate working environment.

In other words, sexual harassment is:

1. Misuse of sexual behavior;
2. Request for sexual favour, and
3. Verbal statement or physical action or gestures that describe a sexual act, or
4. Unwanted action of a sexual nature:
 - a. the recipient has made it clear that the behavior is unwanted;
 - b. the recipient feels humiliated, offended and/or intimidated by the conduct; or
 - c. the perpetrator should have reasonably anticipated that the other person would be offended, humiliated and/or intimidated by the conduct.



ANTI-HARASSMENT POLICY

REVIEW No.	0
DATE:	15-05-20
PAGE	4 of 8

COMPANY:

GRUPO ANTOLIN

COUNTRY:

ALL

SCOPE/ COVERAGE

Harassment can occur to everyone. Both men and women can be victims or perpetrators of behavior that is considered rude, humiliating or intimidating. Whether a behavior is impolite, humiliating or intimidating is an objective test, based on whether a reasonable person would have anticipated that the behavior would have this effect. This action can take place between the employer / supervisor and an employee (vertical relationship) or between employee and employee (horizontal relationship), between an employer and contract or outsourced worker and between employees and service providers, clients or third parties. Unwanted behavior that is done repeatedly or continuously or a single incident may be identified as a sexual harassment.

FORMS OF SEXUAL HARASSMENT

Sexual harassment can take various forms. Broadly, there are five forms of sexual harassment.

- i. **Physical harassment** includes unwelcome touching in a sexual manner such as kissing, patting, and pinching, glancing or staring full of lust;
- ii. **Verbal harassment** includes unwelcome comments about private life or body part or person's appearance, sexually suggestive jokes and comments;
- iii. **Gestural harassment** includes sexually suggestive body language and or gestures, repeated winks, gestures with fingers, and licking lips;
- iv. **Written or graphic harassment** includes display of pornographic materials, sexually explicit pictures, screen savers or posters, or harassment via emails and other modes of electronic communication;
- v. **Psychological/emotional harassment** consists of persistent proposals and unwelcome requests, unwanted invitations to go out on dates, insults, taunts or innuendo of a sexual nature.

HARASSMENT CAN OCCUR

- i. when the conduct has the effect of creating an intimidating, hostile or offensive work environment;
- ii. in a **quid-pro-quo** or **'this for that'** situation when an owner, employer, supervisor, member of management or co-employee undertakes or attempts to influence the process of employment, terms or conditions of employment or other benefit of an employee or job applicant in exchange for sexual favours;
- iii when such conduct is unacceptable for the victim and offensive, thus it is subjective from the perspective of the recipient.

WHAT IS NOT HARASSMENT?

The key aspect of behavior that constitutes sexual harassment is the unwelcome nature of it. Besides **"the unwanted"** element, offensive behavior can lead to sexual harassment. Interaction which is based on mutual consent is not sexual harassment. Sexual harassment does not refer to occasional compliments that are socially and culturally acceptable and appropriate.

ANTI-HARASSMENT POLICY

REVIEW No. 0

DATE: 15-05-20

PAGE 5 of 8