

Directive on Protection from Sexual Harassment, Bullying and Discrimination at Work

14 July 2023

Table of Contents

1. Principle	3
2. Scope of application.....	3
3. Definitions.....	3
3.1 Sexual harassment.....	3
3.2 Bullying	3
3.3 Discrimination	3
4. Responsibility	4
4.1 Responsibility of superiors	4
4.2 Responsibility of employees.....	4
5. Procedure in the event of sexual harassment, bullying and discrimination at work	4
6. Punishment.....	5
7. Disclosures	5
8. Effective date	5

1. Principle

Arbonia AG and its group companies (hereinafter referred to as "Arbonia") protect privacy rights and respect the dignity and integrity of their employees. Sexual harassment, bullying and discrimination at work will not be tolerated. Labor law sanctions should be expected in the event of incidents.

Arbonia requires that all of its employees respect the privacy rights of their co-workers and personal boundaries in interactions between people.

2. Scope of application

This directive is applicable to all employees, trainees, people with executive functions and temporary employees across Arbonia.

3. Definitions

3.1 Sexual harassment

Sexual harassment is defined as any sexual act unwanted by the person affected. For example, sexual harassment can be expressed in the following types of behaviour:

- Sexually suggestive comments
- Comments complementing or insulting someone's body
- Sexist statements and jokes
- Intrusive looks and leering
- Displaying pornographic material or hanging it up
- Suggestive and explicit requests
- Unwanted body contact, physical and sexual acts
- Overtures accompanied by the promise of advantages or the threat of disadvantages

3.2 Bullying

It is a case of bullying if a person has been systematically harassed, pressured or excluded. Typical acts include:

- Constant and unjustified criticism of someone's work
- Treating someone as if they weren't there
- Avoiding contact/avoiding speaking with someone
- Spreading rumours about someone
- Making someone look stupid
- Humiliation
- No work at all or only meaningless work is assigned to someone
- Discrimination or not inviting someone to group events
- Defamation

3.3 Discrimination

Discrimination is prejudicial treatment of someone on the grounds of personal attributes where it would not be objectively justified. Typical examples include disparagement on the grounds of

- gender
- race
- skin colour
- language
- religion
- political beliefs or other beliefs
- national or social origin
- a disability
- belonging to any minority
- wealth
- or any other status

4. Responsibility

4.1 Responsibility of superiors

Superiors are responsible in their area of responsibility for a working environment free from harassment, bullying and discrimination. Superiors are to make employees aware of the Code of Conduct and take remedial action where applicable. Superiors ensure that reports of sexual harassment, bullying or discrimination are followed up without undue delay. Reports shall be taken seriously and the responsible HR contact person shall be informed.

4.2 Responsibility of employees

All employees are obliged to contribute with their personal conduct to a working environment free from harassment, bullying and discrimination. Anyone who observes others being harassed, bullied or discriminated against is encouraged to offer support to victims and to notify the harasser of their misconduct.

It is not only what usually hurts the feelings of the average person that matters. On the contrary, the perception and the subjective feelings of the victim shall also be taken into account.

5. Procedure in the event of sexual harassment, bullying and discrimination at work

Anyone who feels harassed, bullied or discriminated against should, where possible, make this clearly understood by the harasser. It should be clarified that the relevant conduct is unwanted and should be stopped immediately.

The victim or his/her co-workers may directly report the misconduct or suspicion of misconduct to their superior(s) or the responsible HR contact person.

The HR Department advises and supports the employees affected and takes suitable measures to bring the harassment, bullying or discrimination to an end and prevent it in the future. Upon request from the victim, he/she may speak with a person of the same sex.

6. Punishment

In the event that misconduct has been established, the following punishments (individually or cumulatively) may be instituted depending on the severity of the incident:

- Note in staff files of the type of incident
- Written apology to the victim
- Relocation
- Verbal or written warning
- Written threat of dismissal
- Dismissal with notice
- Dismissal without notice

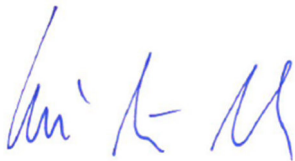
7. Disclosures

Disclosures in conjunction with the Directive on Protection from Sexual Harassment, Bullying and Discrimination at Work are made by the Head of Compliance.

8. Effective date

This directive enters into force immediately and replaces the directive on Protection from Sexual Harassment, Bullying and Discrimination at Work of 12 December 2013.

Arbon, 14 July 2023



Alexander von Witzleben
Executive Chairman of the Board of Directors



Andrea Wickart
Head of Compliance /
Secretary-General