



DIGNITY AT WORK POLICY

1. Purpose & Scope

This policy is split into two sections as follows:-

- Bullying and harassment
- Equality, diversity and inclusion

This Policy is applicable to all employees (including temporary staff and agency workers), independent contractors, officers and directors employed or engaged to provide services to any company within the NAVTOR group of companies.

For ease of reference throughout this document, we will refer to the above collectively as “colleagues and/or employees”.

This Policy is an update following changes to the Workers Protection Act 2023 which comes into force on 26 October 2024.

This policy will be reviewed annually by the HR department to ensure its effectiveness and compliance with changing laws and organisational needs.

2. Process owners and responsible parties

This instruction is approved by the CEO of NAVTOR and is owned by HR. The requirements within this detailed Global instruction shall be adhered to and be part of the NAVTOR’s directives.

3. Legal Compliance

We will comply with all applicable local, state, and federal laws and regulations governing employment. It should be noted that any form of harassment is unlawful and will not be tolerated.

4. Bullying , harassment and sexual harassment

We are committed to providing a healthy working environment where all colleagues are treated with the dignity and respect they deserve. We believe all our employees have the right to work in an environment free from bullying behaviour and any form of harassment, be it on the grounds of race, sex, disability, sexual orientation, religion or belief, age, marital status or civil partnership, pregnancy/maternity, gender reassignment or appearance.



We seek to ensure that our working environment is sympathetic to all of our employees and to those who have business dealings with us, and that they are treated with dignity and respect. This policy applies irrespective of status and applies equally to an employee bullying or harassing a manager as the other way round. In addition, we aim to ensure that employees are protected from harassment of any kind from clients, customers and other business contacts, otherwise known as “third parties”. Please refer to section 9.

Such behaviour will not be tolerated and is unlawful and could lead to disciplinary action, up to and including dismissal, if it is committed:-

- In any work situation
- During any situation related to work, such as a social event with colleagues
- Against a colleague or other person connected with the employer outside of a work situation, including social media or;
- Against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role.

What is the difference between bullying and harassment and sexual harassment?

- **Bullying** is defined as persistent behaviour against an individual that is intimidating, degrading, offensive or malicious and undermines the confidence and self-esteem of the recipient.
- **Harassment** is defined as unwanted conduct that either violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. It may be related to any personal characteristic of the individual (whether perceived or real), or by association (ie related to the individual's relationship or dealings with others who have that personal characteristic). It may be persistent or an isolated incident. It can take many forms, from relatively mild banter to actual physical violence.

Examples: unwanted physical contact or assault but also verbal bullying such as insulting or threatening comments, comments intended to undermine, belittle, embarrass or humiliate the recipient, persistent criticism or trivial fault-finding, and personal abuse, either in public or private, which humiliates or demeans the individual involved. Isolation or non-cooperation at work, deliberate exclusion from conversations or social activities. Abuse of power over a more junior colleague.

Virtual bullying - includes distribution of unwanted emails, texts, images or humiliating data published on social networking internet sites or abusing company technological facilities to contact the employee in an intimidating or malicious manner.

- **Sexual Harassment**, is defined as unwanted conduct of a sexual nature towards another person that makes them feel upset, scared, offended or humiliated. This can include unwelcome physical, verbal or non-verbal conduct.



Examples: Coercion - including threats of dismissal or loss of promotion etc for refusal of sexual favours (or promises made in return for sexual favours).

Unwanted physical conduct - such as unnecessary touching, patting, pinching, brushing against another person's body, insulting behaviour or obscene gestures, physical threats and assault.

Unwanted verbal conduct - such as unwelcome advances, patronising titles or nicknames, propositions or remarks, innuendo, lewd or suggestive comments, over-familiar behaviour, slogans or songs, jokes, gossip and slander (including speculation about a person's private life and sexual activities), banter or abusive/offensive language which is either threatening or refers to a person's sex, race (including colour and ethnic or national origins), disability, sexual orientation, religion or belief, age, marital status or civil partnership, pregnancy/maternity or gender reassignment.

Unwanted non-verbal conduct - such as racially or sexually based graffiti or graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, creation or distribution of suggestive or offensive pictures (including "pin-up" calendars) or videos through any means.

5. **Informal procedure for dealing with bullying, harassment or sexual harassment**

The sensitive nature of complaints of bullying, harassment or sexual harassment is recognised and therefore a choice of routes is provided in order to encourage employees to discuss their problems in confidence with someone they trust and feel comfortable talking to. Any employee who believes they have been the subject of harassment, bullying or sexual harassment in the course of their work may, and only if they are comfortable to do so, either:-

- Seek to speak directly to their harasser about their behaviour
- Ask for the support of an appropriate person (e.g. line manager or HR representative) to address the matter informally with their harasser

Anyone who is being harassed is not obliged to deal with the matter informally in the first instance, they can go straight to report the matter formally.

6. **Formal procedure for dealing with bullying, harassment or sexual harassment**

In order to encourage reporting of harassment there is no prescribed format or form to complete when an employee wants to make a complaint.

NAVTOR have provided all employees with a reporting system through the following steps:

- Log onto HUMA
- Scroll down from the left hand side sub sections until you find "Whistleblowing".
- Click onto the Whistleblowing portal in the top right hand corner



- Click report an incident

Your case will then be received by one of NAVTOR case handlers who will start a follow-up process. The case handlers are currently the NAVTOR HR department.

Your case will always be handled by an HR representative and manager who is not based in your Country so you can feel assured the key contacts for your case are able to review and investigate objectively.

7. Next steps after a complaint is received via the Whistleblowing portal.

The HR team member to which your complaint has been assigned to, will review the complaint and find the right level of manager to support them with the investigation. Depending on who the complaint is regarding will impact on which manager will handle the investigation. Where reasonably practicable this will be a person one level up in seniority than who the complaint is regarding. You will be informed of who will be handling your case within 5 working days of your complaint being received.

Investigations will be conducted as quickly as is practicable and without unreasonable delay, however, the nature of the complaint will dictate the type and length of the investigation.

There may be instances where suspension from work with pay is necessary while investigations are carried out. The Company has the right to suspend the colleague with pay in order that an unbiased, impartial and thorough investigation can take place. The suspension will not normally go beyond 5 working days and is not a form of disciplinary action.

Depending on the circumstances of the case, all employees involved in the complaint may be invited to attend an investigatory meeting. There is no right for colleagues to be accompanied at a formal investigatory meeting.

The Company reserves the right to dispense with an investigatory meeting and to proceed directly to a formal disciplinary hearing.

8. Outcome of investigation

If following an investigation there is found to be a case to answer, informal action may be taken, or where appropriate a formal Disciplinary Hearing will be scheduled. Wherever possible this will be conducted by managers that have not been part of the investigatory process.



If Disciplinary action is required we will follow local legislation for disciplinary action and sanctions however all employees should be warned that bullying, harassment and sexual harassment may lead to dismissal if upheld during this process.

Possible consequences and sanctions of bullying, harassment and sexual harassment that can be handed out by the Disciplinary Hearing panel are as follows:-

- Stage 1 – Verbal Warning
- Stage 2 – First Written Warning
- Stage 3 – Final Written Warning
- Dismissal

9. Third party harassment

NAVTOR does not tolerate harassment of any kind, including third-party harassment, which occurs when an individual is subjected to unwanted conduct by someone who is not a direct employee or representative of the organization. Third party harassment may result in legal liability.

Third-party harassment is defined as unwelcome behaviour directed at an employee, client, or visitor by an individual who is not part of the organization, including but not limited to clients, vendors, contractors, or members of the public.

We encourage all NAVTOR employees who have experienced harassment in any form, to report this to us promptly.

All definitions referred to in section 4 regarding bullying, harassment and sexual harassment apply under this section 9, third party harassment.

Prevention – we have conducted a risk assessment in order to try and mitigate third party harassment incidents. We all have a responsibility to ensure ourselves and our colleagues are kept as safe as possible when dealing with third parties. Therefore all employees are asked to review and contribute to the risk assessment on a regular basis to ensure NAVTOR’s ability to mitigate those risks.

Reporting Procedure – Please follow the steps as defined in this policy, section 5 & 6, for reporting and third party harassment complaint.

Investigation – Please follow the steps as defined in this policy, section 7, for how your complaint will be reported and investigated.



Outcome and action following an investigation - Appropriate action will be taken based on the findings, which may include measures to address the behaviour and ensure a safe environment. NAVTOR may also be obliged, if the incident is serious enough, to report criminal activity to the Police.

10. Closing statement

NAVTOR prohibits retaliation against anyone who reports bullying, harassment or sexual harassment or participates in an investigation. Any retaliatory actions will be addressed swiftly and appropriately.

Any malicious complaints may result in disciplinary action when an allegation of bullying, harassment or sexual harassment is both false and made in bad faith.

11. Training and Awareness

We will provide regular training to employees on recognising and addressing bullying, harassment, and sexual harassment.

12. Feedback and Continuous Improvement

We encourage feedback from both hiring managers and candidates to continuously improve our recruitment process.

SECTION 2 - Equality, diversity and inclusion policy

NAVTOR is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

NAVTOR, in providing goods and/or services and/or facilities, is also committed against unlawful discrimination of customers or the public.

The intention of this policy is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time



- not unlawfully discriminate (in accordance with local legislation) protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities

NAVTOR commits to:

- encouraging equality, diversity and inclusion in the workplace as they are good practice and make business sense
- create a working environment free of bullying, harassment, sexual harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.
- All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, sexual harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public
- make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- decisions concerning staff being based on merit
- review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.