Dignity and Respect at Work

A guide to understanding and preventing harassment in our workplace

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We conduct our business ethically and with integrity. Our values interact with each other to support our remarkable team and strong safety culture. The values are embedded in our policies, our code of business conduct and our safety culture. The DOF Group values are Respect, Integrity, Teamwork, Excellence, and above all we are SAFE.

Safe the RITE way

Message from CEO

Providing a physically and psychologically safe working environment for all employees, contractors and other associates is DOF's highest priority. Together, we strive for a culture of diversity, equality and continuous development, in a safe, inclusive workplace: an environment free from discrimination on any grounds, free from bullying, harassment, sexual harassment or violence.

To do this we maintain an open working environment where employees and contractors are empowered to raise their voice to report any breach of law or any violation of the DOF Group's policies or other legal or ethical concerns. DOF will respond to all reports of unethical or unlawful actions or unacceptable conduct. No one will be disadvantaged or victimised for making a report in good faith.

Building a respectful and safe working environment is everyone´s responsibility. With the entire team's commitment we can ensure we do business safely, the RITE way.

Thank you.

Mons S. Aase
Chief Executive Officer

If you see something unacceptable
raise your voice.

You can report concerns without fear of intimidation or reprisal using multiple channels that maintain confidentiality and protect the rights of both the reporter and the potential subject of a report.

1. **Report it immediately** to your supervisor or any other senior member of your business unit or the human resources manager or a member of the legal/compliance department.
2. **Go to the Ethics Helpline** reporting website via links available from either the DOF intranet or the external company website.

The **Ethics Helpline** is hosted and staffed by an independent third-party provider, who screens all reports for potential conflicts of interest. Reports are then forwarded to DOF for investigation team to be assigned. It is available via link from DOF intranet, and on our external website - 24 hours a day, 7 days a week and in multiple languages. Anonymous reporting is available where local law allows, helpline staff will always alert you if there is a conflict with local laws or special reporting rules apply.

Reports can also be made by phone where you can also choose to remain anonymous or not. Country-based telephone numbers are available and can be found on the website: www.dof.com/helpline

Workplace **bullying and harassment**

unwelcome **behaviour that offends, humiliates or intimidates**

Common types of **workplace bullying and harassment** include:

Subject of **gossip** or **false rumours** and allegations.

Making your job more difficult or impossible to perform.

Sabotaging work deliberately withholding work-related information, resources or information.

Persistent criticism or dismissal of your work.

Being **made fun of,** ridiculed, called names or put down. **Teasing** or **taunting.**

Report

Workplace surveys show the majority of people who reported workplace bullying or harassment **said the behaviour had stopped** as a result.

Don't hesitate

Help is available. **Report even if you feel ...**

- **Unsure how to deal with the situation** or who to turn to for help.
- **Afraid because your bully is a boss** or senior worker.
- **You're worried you're at fault** in some way, or the **bullying is a result of something you've done**.
- **Hopeful the situation will go away** if you don't respond or you avoid the person.
- People will think **you're over-reacting.**
- **Concerned about your reputation** or career.
- It's **how the bully treats everyone.**
- Afraid of **losing your job.**

Remember

DOF has a non-retaliation policy in place so you can speak up and raise concerns without fear of threats, acts of retaliation or harassment.

Don't let these concerns prevent you **reporting workplace bullying or harassment.**

Report and we will respond.

- The Ethics Helpline is hosted and staffed by an independent third-party provider, who screens all reports for potential conflicts of interest. Reports are then forwarded to DOF for investigation team to be assigned.
- A link to the helpline can be found from the DOF intranet and on our external website - 24 hours a day, 7 days a week and is available in multiple languages.
- Reports can be made by phone or online. You have the option to remain anonymous.

Check

Bullying, harassment, sexual harassment or violence at work can inflict temporary or permanent psychological or physical harm on others. Check your behaviour. **Don't be part of the problem.**

Exclusion or **isolation from workplace activities** such as social events or meetings.

Offensive, intimidating or **hurtful messages** via telephone, written or electronic means.

Participation in **demeaning initiation ritual** or **horseplay.**

What can you do about it? If any form of bullying or harassment happens to you, speak up! Remaining silent enables unacceptable behaviour. If you experience or witness workplace harassment, **raise your voice.**

Talk to the people you trust

Seek professional advice

Report through the proper channel

Keep a record of events

- ☐ **Get advice** from your manager, Human Resources or our legal/compliance department.
- ☐ **Take care of your mental health**.
- ☐ **Know the DOF Code of Business Conduct** or refer to the bullying, harassment, sexual harassment, and violence in the workplace policy and use the grievance procedure.
- ☐ **Report unacceptable behaviour** to a senior member of your unit, or Human Resources Department or our legal/compliance department. If you are not comfortable with any of these options, you can make a report using the Ethics Helpline.
- ☐ **Keep a record.** Make a detailed record of what happened – place, date, time, people involved, what was said or done, date the matter was raised and with whom. Ensure that your records are accurate.
- ☐ **Consider approaching the bully**. Your records may help to decide which approach to take. A direct approach can be used to attempt to resolve bullying issues with minimal stress. However, if the bullying continues, formal procedures should be used.
- ☐ **If you're unhappy** with the action taken to investigate a report, or you feel your report will not be treated impartially you can raise your concern with external authorities.

Workplace **sexual harassment**

conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, where that reaction is reasonable in the circumstances.

Common types of **workplace sexual harassment** include:

Sexually suggestive comments or jokes.

Intrusive questions about a person's private life.

Inappropriate comments about a person's physical appearance.

Inappropriate staring or **leering** or cornering that makes people feel intimidated.

Inappropriate physical contact, **unwelcome** touching, hugging, kissing or **requests for sex.**

Don't hesitate

Help is available.
Report even if you feel ...

- It **wasn't serious** enough
- **It's easier** to keep quiet
- People will think **you are overreacting**
- It **won't change anything** or that nothing will be done.
- The complaint process **will be embarrassing** or difficult
- **Concerned for your reputation** or career.

Report

Workplace surveys show the majority of people who reported workplace sexual harassment **said the behaviour had stopped** as a result.

Remember

DOF has a non-retaliation policy in place so you can speak up and raise concerns without fear of threats, acts of retaliation or harassment.

Don't let these concerns prevent you **reporting workplace sexual harassment.**

Report and we will respond.

- The Ethics Helpline is hosted and staffed by an independent third-party provider, who screens all reports for potential conflicts of interest. Reports are then forwarded to DOF for investigation team to be assigned.
- **A link to the helpline can be found from the DOF intranet and on our external website -** 24 hours a day, 7 days a week and is available in multiple languages.
- Reports can be made by phone or online. **You have the option to remain anonymous.**

Remember

If you feel comfortable doing so and you think you can do it in a safe way, then call the behaviour out.

If you witness sexual harassment you should report it. We all have an obligation to speak up when we see unwanted behaviour.

Look out for your own mental health and seek help if you need to. Most services for victims of sexual violence are also open to supporters or witnesses.

Sharing, watching or displaying **pornographic/ provocative material** at work.

Sending suggestive notes, emails of other correspondence.

Unwanted and repeated attention, **stalking.**

If you experience or witness workplace sexual harassment, raise your voice.

Talk to the people you trust

- ☐ **Talk to a person you trust** in the workplace.
- ☐ **Approach your human resources representative** for advice.

Seek professional advice

- ☐ If you feel comfortable, **tell the person who is behaving inappropriately** you are offended and want it to stop.
- ☐ **Report the matter to management**, to a senior member of your unit, or Human Resources Department or our legal/compliance department. If you are not comfortable with any of these options, you can make a report using the Ethics Helpline.

Report through the proper channel

- ☐ **Keep a record of events** and the names of people involved, including witnesses if there are any. Make sure the record focuses on the facts; what happened, when and on what date(s) and, if appropriate copies of any relevant documents.
- ☐ **Send yourself an email** with all relevant information soon after the event is a good way to keep notes. Emails capture accurate dates and times for the record.

Keep a record of events

- ☐ **If you're unhappy** with the action taken to investigate a report, or you feel your report will not be treated impartially you can raise your concern with external authorities.

Workplace **violence**

physical violence or any behaviour that creates a fear of violence

If you are in danger or require emergency assistance, contact local emergency services without delay. The ethics helpline is not an emergency response service.

Common types of **workplace violence** include:

Angry or **hostile** behaviour, verbal threats, **Intimidation** or **insults.**

Invading physical space. Tripping.

Aggressive behaviour e.g. feet stamping; banging, kicking or hitting items; throwing objects.

Don't hesitate

Help is available. **Report even if you feel ...**

- Afraid of **retaliation**
- **Worried** you will get **a reputation for 'snitching'** or 'dobbing'
- Afraid of your **manager's reaction**
- You don't know the **company procedures and policies**
- Unsure about **what to do**
- Your **complaint will be disregarded**
- **Concerned your reputation** or career will suffer.

Report

Workplace surveys show the majority of people who reported workplace violence **said the behaviour had stopped** as a result.

Remember

DOF has a non-retaliation policy in place so you can speak up and raise concerns without fear of threats, acts of retaliation or harassment.

Don't let these concerns prevent you **reporting workplace violence.**

Report and we will respond.

- The Ethics Helpline is hosted and staffed by an independent third-party provider, who screens all reports for potential conflicts of interest. Reports are then forwarded to DOF for investigation team to be assigned.
- A link to the helpline can be found from the DOF intranet and on our external website - 24 hours a day, 7 days a week and is available in multiple languages.
- Reports can be made by phone or online. You have the option to remain anonymous.

Verbal abuse such as shouting or swearing.

Threats of punishment or violence.

Remember

Don't hesitate. Use the DOF Stop Work authority if there is an immediate or imminent hazard - such as the threat of physical assault - and you have a reasonable concern your health and safety, or the safety of others, is at serious risk.

Look out for your own mental health and seek help if you need to. Most services for victims of violence are also open to supporters or witnesses.

If you experience or witness workplace violence, raise your voice. Reporting unwanted or offensive behaviour early is often an effective way to prevent aggression escalating into more serious forms of violence.

Ask for help from others

Remove yourself if you're able

Report to management

Keep a record of events

- ☐ **If it is safe** to do so, remove yourself from the situation by; retreating to a safe location, asking the aggressor to leave the work area or disconnecting from the phone call.
- ☐ **If it is safe** to do so, you could use verbal de-escalation. For example, tell the other person you object to their behaviour and ask that it stop. Pointing out that the behaviour is inappropriate and makes you feel unsafe may resolve a situation before it escalates.
- ☐ **Communicate the need for help**, such as seeking support from other workers, security personnel or people nearby.
- ☐ **You may decide to seek help from Police**, for example if the behaviour escalates to physical assault or the threat of physical assault.
- ☐ **After an incident; make sure you and other people are safe**, seek first aid or urgent medical attention where necessary, seek support (including psychological support) from a colleague, helpline, counselling service or employee representative.
- ☐ **Keep a record of what, when and where** it happened, who was involved and anything else you think may be important. Keep a screen shot if the behaviour occurs online.
- ☐ **Report what happened** to a supervisor, human resources or legal department.
- ☐ **If you're unhappy** with the action taken to investigate a report, or you feel your report will not be treated impartially you can raise your concern with external authorities.

If someone reports unwanted behaviour to you, follow these guidelines on what to do, and what not to do:

If someone approaches you to report unwanted behaviour, **DO NOT**;

- ☐ Joke about the situation with other people;
- ☐ Rush to judgement or take sides;
- ☐ Offer physical comfort, like hugging the person
- ☐ Text, email, use social networking or otherwise discuss the behaviour with others;
- ☐ Ignore the person in meetings, in e-mails or during office activities;
- ☐ Never suggest that the person has misunderstood someone's actions or words;
- ☐ Disqualify feelings or demean the situation;
- ☐ Identify the people involved and apply measures without involving the necessary departments;
- ☐ Comment on the situation in team meetings.

If someone makes a complaint **you should;**

- ☐ Seek to understand the situation; Listen carefully (don't talk or interrupt, allow the person to explain the situation);
- ☐ Keep an open mind - do not jump to conclusions about either party;
- ☐ Make a note of the conversation and try to record as much information as possible: who, when, where and whether there were witnesses;
- ☐ Establish how the person wants you to proceed on their behalf, i.e. report anonymously through the Ethics Helpline or through Human Resources Department or our legal/compliance department.
- ☐ As a rule you should notify DOF HR immediately when issues or complaints arise.

Understand the consequences:

Be aware

DOF operates across geographical boundaries under different regional and international laws. Where legislation differs, DOF will favour consistent business practices within our Group and with business partners to **maintain the highest common standard.**

Please study this document and make sure you are not inadvertently perpetrating harm - there are consequences up to dismissal.

If an employee chooses to harass or bully another in the workplace, and their behaviour is reported, that individual will risk:

- ☐ Facing disciplinary action, up to and including dismissal from employment, and;
- ☐ Prosecution by government agencies, with significant penalties potentially payable by individuals found in breach.

The watertight integrity test

There is no place for any form of harassment at DOF and we have policies in place to protect our entire team, please make sure you know what to do if you ever find yourself in a position where you or someone you know needs support.

This watertight integrity test is-
if the behaviour is unwanted, it is unwelcome in our workplace.
The golden rule is respect.

Reports of unwanted behaviour will be investigated. Any person found to have bullied, harassed, sexually harassed or behaved violently towards another person will face disciplinary action.

Think the RITE way

Know what it means; bullying, harassment, sexual harassment and violence in the workplace:

Check

Be clear.

Although an assertive communication style may give a perception of personal criticism, legitimate management action, including performance management processes and disciplinary actions are not regarded as bullying.

Managers should take care to ensure their intention in these instances is clear to the members of their team.

Definitions

Harassment includes any unwelcome behaviour that offends, humiliates or intimidates a person. This includes inappropriate behaviour made on the basis of race, religion, age, gender orientation or other forms of discrimination. Harassment can involve physical conduct, verbal conduct or visual conduct (e.g., in the form of posters, email, or SMS messages).

Workplace bullying is the repeated and unreasonable behaviour directed towards a worker or group of workers.

Mobbing or 'group bullying', mobbing in the workplace involves groups of people targeting a co-worker for isolation, humiliation, and aggression.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, where that reaction is reasonable in the circumstances.

Abuse of power is the misuse of a position of power to take unjust advantage of individuals, organisations, or governments.

Workplace violence is as any act in which a person is abused, threatened, intimidated or assaulted in his or her employment. While exact definitions vary, generally speaking workplace violence or harassment includes: threatening behaviour – such as shaking fists, destroying property or throwing object.

Our commitment:

The DOF Group does not tolerate any form of harassment, (including sexual harassment or bullying) in the workplace. The Group seeks to create an environment of empathy, mutual respect and understanding amongst all staff.

The DOF Group shall:

- **Create an awareness of the DOF Group's intolerance toward harassment and abuse** in all forms including sexual, racial, ethnic, religious, disability and age;
- **Create an open environment of trust** whereby any person will feel able to report incidences of harassment free from retaliation;
- **Maintain a fair, pro-active and thorough program for the investigation of harassment and bullying allegations**;
- **Maintain a process of counselling and disciplinary action** for personnel found to be engaging in harassment or bullying;
- **Remain alert to the potential of unreported incidences of harassment**;
- **Dismiss personnel engaged in harassment** if counselling or other actions are ineffective.

Reporting FAQs

I want to report unacceptable behaviour, what channel should I use? Can my concerns be resolved using the standard reporting structure, or should I use Ethics Helpline?

Whichever reporting channel you use, all reports remain confidential, will be treated with respect and investigated by a professional, impartial team. No one will ever be disadvantaged or victimized for making a complaint in good faith.

If you wish to remain anonymous you can do so by making a report on the Ethics Helpline platform. If you do not wish to identify yourself, we will always respect your decision.

DOF investigates breaches in the Company's Polices or Code of Business Conduct (COBC) to improve operations and contribute to a safe, honest, and respectful environment.

What happens when I make a report in Ethics Helpline and start a complaint process?

When making a report, you will receive a unique, non-transferable, protocol number and a password. Do not pass this information on to third parties. You can access the investigation status updates and follow its progress with the protocol number and password.

The compliance team will initiate an internal investigation into the different aspects of the reported situation. The investigation is conducted by a professional, impartial team, using best practice techniques and always focuses on the safety and protection of all involved.

The complexity of the case and the number of people involved will dictate the time to conclusion and this may not be as fast as you anticipated. However, you can access the platform for status updates or to communicate with the investigation team whenever you want, with your protocol number and password.

If I choose to make a report anonymously, can DOF track my phone number or email?

No. Your phone number, and/ or email are protected by the Ethics Helpline platform, and no-one will be able to see or track your personal information. Your anonymity is guaranteed.

If I make a report on the Ethics Helpline platform or I submit contributing information in the system, how is my anonymity protected. What are my guarantees?

All interviews are conducted in the strictest confidence to ensure that everyone involved feels comfortable reporting what happened. All supporting information is protected within the Ethics Helpline platform and is only accessible to the investigating team.

DOF has a non-retaliation policy, which guarantees that the parties involved, when reporting violations in good faith will not be subject to persecution, threats, acts of retaliation or harassment.

How will I know what happens to my report?

You will receive a protocol number and a password to use to access the platform.

The status and outcome are always communicated to the reporting party. Please be aware, due to confidentiality and privacy legislation, we cannot disclose certain results and actions resulting from the complaint.

If the report is anonymous, the reporting party will be encouraged to get in touch through the available channels.

If I make a report my communication will be ignored?

All reports are reviewed and actioned promptly. While not all reports will require a formal investigation, every report will receive a response explaining the next steps. No report will be ignored.

Will I face retaliation or be disadvantaged at work for using the Ethics Helpline?

No. Retaliation against anyone who raises a concern in good faith is a violation of DOF's COBC and conduct which will not be tolerated.

I have witnessed a breach of DOF's COBC. I am not sure this is my problem or if I want to get involved?

We all have an obligation to speak up when we see unethical behaviour. Those who engage in conduct that violate DOF's COBC, policies or the law harm themselves, their colleagues and the company. If you suspect or witness a violation of our COBC, our policies, procedures or the law, please Speak Up!

Making a report through the Help Line will secure my employment?

Use of the Help Line ensures confidentiality, and retaliation will not be tolerated. However, it will not secure employment. If the reporting party is performing poorly, is not complying with DOF's values, policies and procedures, then appropriate disciplinary action may be taken, and this action should not be confused with retaliation.

You are right to report something you see as wrong

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