



Anti-harassment Policy



I. Introduction

The company REBELDOT SOLUTIONS SRL, with its registered office in Sat Salicea, Ciurila commune, no. 104F, Cluj County, registered with the Cluj-Napoca Trade Register under number J12/1724/2018, unique registration code RO 39271439, legally represented by the administrator XYZ MANAGEMENT SERVICES SRL, through representative Tudor-Armand Ciuleanu (hereinafter referred to as “RebelDot”), adopts this Guideline on the prevention and combating of sexual harassment and moral harassment in the workplace (hereinafter referred to as the “Guideline”), in accordance with applicable European and national legislation.

Approved by: CEO – Tudor Ciuleanu

Last update: 9 January 2025

Version: V1

II. Guiding Principles

By adopting and implementing the provisions of this Guideline, RebelDot seeks to ensure a safe environment for all employees, without discrimination based on race, nationality, ethnicity, language, religion, social category, beliefs, sex, sexual orientation, age, disability, non-contagious chronic disease, HIV infection, belonging to a disadvantaged category, or any other criterion that aims to or results in restricting or eliminating the recognition, use, or exercise, on equal terms, of human rights and fundamental freedoms or rights recognized by law in the political, economic, social, cultural, or any other public sphere.

Ensuring equal opportunities and treatment between women and men is fundamental, and any manifestation of power relations between men and women is prohibited, being considered a form of violation of human dignity and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment.

RebelDot applies zero tolerance for sexual harassment and moral harassment in the workplace and will treat all allegations of harassment with seriousness and promptness, taking the necessary measures in this regard.

RebelDot ensures a safe environment for all employees, in which all reports regarding sexual harassment and moral harassment in the workplace will be treated seriously, promptly, and confidentially. Throughout the complaint investigation process, all parties involved will be heard and treated with respect and consideration, ensuring the protection of the personal data of the persons concerned.

III. Applicable Legal Provisions

This Guideline is prepared in compliance with applicable legislation, and RebelDot will update this Guideline when required by law or when new measures need to be adopted, committing to informing the concerned persons regarding any modifications.

European legal framework

- Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation, which provides that harassment shall be deemed to be discrimination when an unwanted conduct occurs with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment;
- Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast).

National legal framework

- Law no. 202/2002 on equal opportunities and treatment between women and men, republished, with subsequent amendments and completions;
- Law no. 53/2003 – Labour Code, republished, with subsequent amendments and completions;
- Law no. 286/2009 on the Criminal Code, with subsequent amendments and completions;
- Government Ordinance no. 137/2000 on the prevention and sanctioning of all forms of discrimination, republished, with subsequent amendments and completions;
- Government Decision no. 262/2019 approving the methodological norms for the application of Law no. 202/2002 on equal opportunities and treatment between women and men.

IV. Purpose of the Guideline

The purpose of this Guideline is to provide RebelDot employees with the necessary tools to fully exercise their individual rights and freedoms in the workplace.

The main objective is to ensure a safe working environment based on equal respect for human dignity and to provide all employees, regardless of sex, with the conditions necessary for a climate of trust, empathy, understanding, and professionalism. We also commit to actively combat all forms of sexual harassment and moral harassment.



V. Applicability of the Guideline

The provisions of the Guideline apply to all employees, as well as to the persons with whom they interact during working hours within RebelDot. The provisions apply to all harassment cases, regardless of whether they occur between persons of different sexes or the same sex. Any type of harassment is prohibited, both in the workplace and outside it, when participating in various events, business trips, training sessions, or conferences.

In situations where actions contrary to this Guideline occur, RebelDot will take the necessary measures as regulated in the Guideline.



VI. Definitions

harassment — any unwanted conduct, including of a sexual nature, that makes a person feel offended, humiliated, or intimidated. This includes situations where a person is asked to engage in sexual activities as a condition of employment, as well as situations that create a hostile, intimidating, or humiliating environment. Harassment involves multiple incidents and/or repeated actions that constitute physical, verbal, or nonverbal harassment. Examples of conduct or behaviors that constitute workplace harassment include, but are not limited to:

- **Physical conduct** — unwanted, repeated physical contact (inappropriate touching), physical violence (including sexual assault), use of threats or job-related rewards to solicit sexual favors.
- **Verbal conduct** — comments on an employee's appearance, age, or private life; sexual comments; sexual stories and jokes; sexual advances; repeated and unwanted social invitations for dates or physical intimacy; insults related to the employee's sex or other characteristics; overly familiar remarks; sending humiliating, degrading, sexually explicit messages by phone, email, or any other communication means if done systematically/repeatedly and if they aim, result in, or are likely to cause physical, psychological, or sexual harm.
- **Nonverbal behavior** — displaying sexually suggestive or explicit materials; sexually suggestive gestures; whistling; persistent staring, if done systematically/repeatedly.

VI. Definitions

moral harassment in the workplace:

- any behavior exercised towards an employee by a hierarchical superior, subordinate, or comparable colleague, related to work relationships, which aims to or results in the deterioration of working conditions by infringing on the employee's rights or dignity, affecting their physical or mental health, or compromising their professional future, manifested in any of the following forms:
 - hostile or unwanted conduct;
 - verbal comments;
 - actions or gestures.
- any behavior that, through its systematic nature, can harm the dignity or physical or mental integrity of an employee or group of employees, endangering their work or degrading the work climate. For the purposes of this law, stress and physical exhaustion fall under moral harassment in the workplace.

informal procedure — a procedure for resolving a harassment case whereby the victim informs the alleged harasser that they perceive the behavior in question as unwanted and disturbing.

formal procedure — a procedure for resolving a harassment case consisting of the victim submitting a complaint to the person responsible for receiving and resolving harassment cases.

VI. Definitions

RebelDot wants employees to be informed; thus, for clearer understanding of the terms used in this Guideline, the following actions may represent **examples of conduct that constitutes harassment** as defined in this section:

- displaying or distributing offensive or indecent material;
- insinuations, insults, or obscene, sexist, racist, or homophobic remarks, made systematically/repeatedly;
- using offensive language in describing a person with a disability or mocking a person with a disability;
- comments about a person's physical appearance or character that cause embarrassment or distress;
- unwanted attention, such as spying, constant following, harassment, overly familiar behavior, or unwanted verbal or physical attention;
- repeated or unsolicited phone calls, text messages, emails, social media messages, faxes, or letters with sexual, hostile, or privacy-invading content;
- inappropriate and persistent questions about a person's age, marital status, personal life, interests, or sexual orientation, or similar questions about a person's racial or ethnic origin, culture, or religion;
- unwanted sexual advances, repeated requests for dates, or threats;
- suggestions that sexual favors may lead to professional promotion or that failure to grant them may harm one's career.

VI. Definitions

For the correct application and clear understanding of this Guideline, below are examples of **conduct that is legitimate in the employment relationship**, falling under the employer's prerogatives, and does not constitute harassment:

- directly supervising employees, including setting performance expectations and providing work performance feedback;
- taking steps to correct performance deficiencies, such as placing an employee on a performance improvement plan;
- taking reasonable disciplinary measures;
- giving directives regarding tasks, how and when work should be done;
- requesting updates or reports;
- approving or denying time-off requests.

It is very important that, in any procedure to which the provisions of this Guideline apply, the persons involved are informed and correctly understand the contents of this Guideline.



VII. Roles and Responsibilities

For the implementation and enforcement of this Guideline, the following persons have specific roles and responsibilities:

7.1. Responsibilities of the company management:

- a. Ensure that the provisions of the Guideline are communicated to employees through the People & Culture department;
- b. Ensure employee involvement in preventing and eliminating situations of sex-based harassment and moral harassment at the workplace by creating a pragmatic approach to managing these types of situations;
- c. Ensure the creation of all necessary mechanisms so that all instances of inappropriate behavior are reported and resolved, without relying solely on formal or informal complaints made by employees;
- d. Ensure that incidents in which harassment is alleged are investigated with the utmost seriousness and reported in accordance with applicable legal provisions;
- e. Designate a person responsible for receiving and resolving complaints;
- f. Ensure that employees are aware they will be heard regarding the situations they report, that they face no constraints of any kind in communicating the facts, and that the reported situations are confidential and carefully analyzed;
- g. Ensure the establishment of a case-reporting registry where complaints will be recorded; the registry will include a registration number, information about the incident, and the solutions identified;
- h. Initiate all necessary actions to ensure that any employees found guilty in confirmed harassment cases are sanctioned in accordance with legal provisions and that all protective measures for the victim are ensured.

VII. Roles and Responsibilities

7.2. Person responsible for receiving and resolving harassment cases

- (1) The person responsible for receiving and resolving harassment cases is appointed by the company management.
- (2) Upon appointment, this person will sign a confidentiality agreement regarding the activities they will carry out, in accordance with applicable legal provisions.
- (3) The responsible person ensures:
 1. Receipt and registration of complaints in the special registry;
 2. Documentation of all steps taken during the incident investigation phase;
 3. Preservation of the documents produced/managed, both in electronic format and on paper.
- (4) The responsible person has the following duties:
 1. Participate in informing employees about current policies and legislation;
 2. Provide support and counseling for employees affected by a harassment incident, ensuring that the situations reported are confidential and carefully analyzed;
 3. Resolve complaints made by employees related to inappropriate behavior, regardless of whether these complaints are formal or informal;
 4. Report all harassment cases brought to their attention to the company management;
 5. Cooperate with employees whenever they are asked to provide relevant information for resolving a harassment case;
 6. Manage the complaint resolution processes and/or disciplinary measures, together with company management.

The appointment of another responsible person can only be made through an official decision by company management.

VIII. Complaint and resolution procedure

The procedure for resolving harassment cases within the company can be **(1) informal** or **(2) formal**.

8.1. Informal procedure

When possible, harassment victims may inform the alleged harasser that they perceive the behavior as unwanted and disturbing. This is a right of the victim, not an obligation.

They may also communicate this information to representatives of the People & Culture department.

In this context, the mentioned parties will ensure that the victim is properly informed and that choosing to resolve the situation through an informal procedure does not exclude the possibility for the victim to also follow the formal procedure outlined in this Guideline.

8.2. Formal procedure

When the person responsible for receiving and resolving harassment cases receives a harassment complaint, they must:

1. Register the complaint and relevant information in the registry;
2. Ensure that the victim understands the procedures for resolving the complaint;
3. Maintain a confidential record of all discussions;
4. Respect the victim's choices;
5. Ensure the victim knows they can also file a complaint with other institutions competent in the field of harassment.

During the complaint resolution procedure, the victim has the right to the support of an advisor, and the employer is obliged to inform the victim about this right. Additionally, the victim may be assisted by an employee representative during the resolution procedure.

The responsible person will inform the victim about the possibility of requesting legal or psychological counseling.

VIII. Complaint and resolution procedure

8.3. Reporting and resolving incidents

Step 1 – Filing the complaint

The complaint can be submitted by the harmed person either in writing (signed) or verbally (through a discussion with the responsible person, after which a written record will be drafted).

The responsible person will ensure the confidentiality of the harmed person's data within this procedure and will offer the complainant the necessary support during the process.

Step 2 – Report and analysis of the reported situation

The responsible person will analyze the reported situation and draft a report for resolving the complaint.

To draft the report, the responsible person will analyze the reported incident following these rules:

- Communicate to the victim the possible resolution options, analyze the victim's requests, clarify their opinions, and record the decision made; also recommend psychological and legal counseling.
- Inform the person against whom the complaint was made about the complaint and ensure they understand the provisions of this Guideline.
- Inform both the complainant and the alleged perpetrator separately about the possibility of facilitating discussions between the two parties; these discussions are conditional on the prior written agreement of the complainant.
- Interview the involved parties separately, as well as other relevant third parties.
- With the consultation of the People & Culture department and company management, take provisional measures to protect the complainant if circumstances require it.
- Keep a clear and written record of all actions taken.
- Ensure the confidentiality of all information.

VIII. Complaint and resolution procedure

The report will include:

i. Data from the complaint: All relevant information provided in the complaint will be recorded, such as the description of the incident, date and place of the incident, names of those involved, and any witnesses.

ii. Data resulting from the guidance and counseling process for the victim:

- Communicate resolution options, analyze the victim's requests, clarify their opinions regarding the desired outcome, and record the decision made;
- Refer the victim to psychological and legal counseling and record the proposed and agreed measures.

iii. Data resulting from the hearing and counseling process for the alleged harasser:

- Provide the alleged harasser the opportunity to respond to the complaint;
- Ensure the alleged harasser understands the complaint mechanism;
- Inform the alleged harasser about the harassment, sexual harassment policies, and the relevant national legislation;
- Inform the alleged harasser about possible sanctions;
- Facilitate, if applicable and only with the prior agreement of the victim, discussions between the two parties.

If the reported incident presents complex elements and a high degree of difficulty, the responsible person has the right to request that the company management assign two persons from the People & Culture department to participate in the procedure regulated by this article. The report prepared by the responsible person will be submitted to company management for the resolution of the complaint.

VIII. Complaint and resolution procedure

8.4. Resolution of the complaint

The responsible person is obliged to ensure that the complaint resolution process is completed within a maximum of 45 working days from the date the complaint was filed.

The resolution of the complaint represents the final stage of the procedure, during which, based on the report regarding the complaint, the company management will decide on the applicable measures.

8.5. Possibility of filing an external complaint

An employee who has been subjected to harassment may also file a complaint with other institutions competent in the field of harassment. These complaints can be made under the provisions of Law no. 202/2002, republished, with subsequent amendments and completions, to:

- The Territorial Labor Inspectorate (ITM);
- The National Council for Combating Discrimination (CNCD);
- The courts of law;
- The criminal investigation authorities if the harassment is so severe that it constitutes an offense under the Penal Code.

IX. Sanctions

Any person who, following the completion of the complaint procedure, is found guilty of harassment may be subject to the sanctions provided by applicable legislation, including but not limited to the provisions of **Law no. 53/2003 – Labor Code, Law no. 286/2009 – Penal Code, and Government Ordinance no. 137/2000** on the prevention and sanctioning of all forms of discrimination, republished, with subsequent amendments and completions.

The nature of the sanctions will depend on the severity and scope of the harassment acts. Proportional sanctions will be applied to ensure that harassment incidents are not treated as normal or tolerated behavior.

Sanctions applicable to the employer/manager are provided under **Government Ordinance no. 137/2000** on the prevention and sanctioning of all forms of discrimination, republished, with subsequent amendments and completions, as well as **Law no. 202/2002** on equal opportunities and treatment between women and men, republished, with subsequent amendments and completions, and are applied proportionally to the gravity of the acts.

X. Monitoring and Evaluation

RebelDot will undertake all necessary steps to effectively implement this Guideline.

The responsible persons will ensure monitoring and will report to the company management on the application of the provisions of this Guideline by the end of the first quarter of each year, covering the previous year, including the number of incidents recorded, how they were resolved, and the recommendations provided.

This Guideline complies with the legal provisions in force at the time of its adoption (November 6, 2023). In the event of any relevant legislative changes, the Guideline will be continuously updated to remain aligned and will be communicated to the affected parties.

