



<b>Document I.D.</b>	<b>Eficode Group Anti-Harassment Policy</b> Group Anti-Harassment Policy setting out our commitment to a harassment free work environment for everyone
<b>Owner</b>	Head of People and Culture
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## 1. Definitions

“**Board**” means the Board of Directors of Eficode Group.

“**Eficode Group**” or “**Group**” means Eficode Holdings Oy and all (or any, as context may require) of the legal entities belonging to the same group of companies as it, as set out in the Finnish Accounting Act from time to time.

“**Eficode People**” means all Eficode employees and Eficode non-executive directors, such as the members of the Board of Directors and those individuals acting as Eficode’s authorized agents.

“**Policy**” means this group policy governing anti-harassment in the Eficode Group.

“**Prohibited Conduct**” means collectively; discrimination, harassment, sexual harassment, abuse of authority, bullying, and victimization.



## 2. Introduction

Eficode Group is an international organization, both multicultural and diverse, and it values and celebrates all differences and expects that difference will be respected and embraced. You can learn more about this in our [Diversity, Equity, Inclusion Policy](#).

Eficode Group has a legal obligation to eliminate Prohibited Conduct of which it is, or should be, aware. We are committed to maintaining a zero-tolerance approach to all Prohibited Conduct and want to encourage a culture where individuals feel comfortable engaging in an open and honest dialogue about these topics and are able to report any incidents they encounter or witness.

## 3. Purpose

The purpose of this Policy is to ensure that all Eficode People understand that they have the right to be treated with dignity and respect. Prohibited Conduct is not acceptable and will not be permitted, condoned or tolerated within Eficode Group. Through this Policy we aim to prevent, respond to incidents that arise, and take action to effect long-term change by:

- educating all Eficode People about all forms of Prohibited Conduct and their role in developing a culture free from such behavior;
- fostering a working environment that supports the dignity and respect of all and is free from Prohibited Conduct;
- if an incident does occur, ensuring Eficode People are familiar with the process and procedure for dealing with it to ensure it is properly managed;
- capturing learning from what happened to help create an environment free from any form of Prohibited Conduct;
- monitoring our progress in achieving a workplace free from any form of Prohibited Conduct; and
- building continuous improvement into our culture.

## 4. Scope

This Policy applies to all Eficode People, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

This Policy covers Prohibited Conduct which occurs at work and outside of the workplace such as business trips, conferences, work related (including work related social) events and cyber bullying. It covers Prohibited Conduct by Eficode People (which may include consultants, casual



workers, contractors and agency workers) and also by third parties such as suppliers or visitors to Eficode Group premises.

This Policy sets out our commitment and the principles that apply to all our global operations, with no exceptions. It is also anticipated that certain geographies within Eficode Group may require local policies in order to comply with national and local laws and regulations regarding anti-harassment, in addition to the provisions of this Policy. Where national law and international standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honor the principles of international standards.

## 5. Prohibited Conduct

### 5.1. What is discrimination?

Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, religion, nationality, ethnic origin, sexual orientation, disability, age, language, social origin or other status. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority.

### 5.2. What is harassment?

Harassment is any improper and unwelcome conduct that might reasonably be expected or reasonably be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment. Harassment normally implies a series of incidents, but a single incident can amount to harassment. Disagreement on work performance or on other work-related issues is normally not considered harassment and is not dealt with under the provisions of this Policy but in the context of performance management (see section 11).

### 5.3. What is sexual harassment?

Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both sexes can be either the victims or the offenders.



## 5.4. What is abuse of authority?

Abuse of authority is the improper use of a position of influence, power or authority against another person. This is particularly serious when a person uses their influence, power or authority to improperly influence the career or employment conditions of another, including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion. Abuse of authority may also include conduct that creates a hostile or offensive work environment which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion. Discrimination and harassment, including sexual harassment, are particularly serious when accompanied by abuse of authority.

## 5.5. What is bullying?

Bullying can be offensive, intimidating, malicious or insulting behavior involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can involve both personal strength and the power to coerce through fear or intimidation. The behavior is often repeated and habitual. Bullying can be carried out by an individual or group of people and can involve physical, verbal and non-verbal conduct.

## 5.6. What is victimization?

Victimization means treating an employee badly (subjecting them to a detriment) because they have done any of the following or because it is believed that they are going to do so:

- making a claim or complaint in good faith under any local laws or regulations applicable to Eficode Group against Eficode Group or in connection to its operations;
- helping someone else to make a claim by giving evidence or information in good faith on the matter;
- making an allegation in good faith that someone has breached any local laws or regulations pertaining to the topic of this Policy or relevant local laws, such as the UK Equality Act 2010.

Any form of unlawful or otherwise retaliatory treatment is unacceptable to Eficode Group even if it does not fall directly within any of the above descriptions.

## 6. Performance management

Prohibited Conduct is not the same as managing someone's performance. If your manager is giving you work to do or managing your performance using an informal or formal process, in



accordance with the law and Eficode Group's policies, this will never on its own be considered Prohibited Conduct.

## 7. Third parties

Prohibited Conduct against Eficode People will not be tolerated, whether caused by those that work here or third parties including customers, suppliers, clients or visitors to our premises. Any instances of work-related Prohibited Conduct should be reported in line with this Policy, regardless of who the alleged perpetrator is.

## 8. Our duty of care

This Policy should be read in conjunction with our other Eficode Group policies to give a holistic view of our workplace culture and efforts to combat Prohibited Conduct. The following policies are particularly relevant and provide context specific guidance:

- [Eficode Group Health and Safety Policy](#)
- [Eficode Group Code of Conduct](#)
- [Eficode Group ESG Policy](#)
- [Eficode Group People Policy](#)
- [Eficode Group Diversity, Equity, Inclusion Policy](#)
- [Eficode Group Human Rights Policy](#)
- Eficode Whistleblowing Procedures

We recognise that Prohibited Conduct can be more prevalent in certain environments, including where there are disparities in power between different groups of Eficode People. This includes but is not limited to power disparities as a result of disability, sex, sexual orientation, gender identity, race and age. We also recognise that high levels of workplace stress can be a contributory factor in creating a working environment in which Prohibited Conduct is more likely to occur.

In discharging our duty of care, we recognise that there are certain measures that can help to prevent Prohibited Conduct in the workplace. We are committed to the adoption and operation of such measures, including:

- Improving equity at all levels of the organization: See our additional policies for more information.
- Improving diversity and inclusion at all levels of the organization: See our additional policies for more information.
- Engaging with Eficode People: Ascertaining how working conditions impact Eficode People helps us to identify any areas of concern. To this end, we conduct regular



employee pulse surveys which are supplemented by ad hoc employee forums and longer surveys.

- Data monitoring: Employee data related to sickness, absence rates and turnover will be carefully monitored to identify patterns of behavior as it is recognised that they can be linked to high stress levels and associated behaviors which may be indicative of Prohibited Conduct.
- Risk assessments: that include consideration of factors that can increase the risk of Prohibited Conduct including: work-place stress, power imbalances, job insecurity, lone working, customer-facing duties, and lack of diversity and inclusion in the workforce. See our Group Health and Safety Policy for more information on workplace risk assessments.
- Continuous awareness-raising: about the nature and impacts of Prohibited Conduct and the requirement of respectful behavior for all Eficode People to create a culture free from Prohibited Conduct and identify and address incidents when they occur. Awareness of this Policy, and all associated policies, copies of which are available to all Eficode People on Confluence.
- Leadership champions: This Policy is supported and championed by the Eficode leadership team.
- Appropriate training: ensuring that all employees receive appropriate training on their expected conduct, the consequences of perpetrating Prohibited Conduct and how to report concerns or incidents of Prohibited Conduct.
- Confidential reporting mechanisms: See our additional policies for more information.
- Monitoring and reporting progress: Progress against the aims of this Policy will be monitored, reported to and reviewed by the Eficode leadership team to ensure we act on what we learn and continuously improve our efforts to meet the commitments we have made.

## 9. Responsibilities

All Eficode People have a responsibility to contribute to a respectful working environment and a duty to assist in the creation of a safe working environment, where Prohibited Conduct is not tolerated. To discharge this duty, Eficode People must:

- Ensure they understand what Prohibited Conduct is.
- Be aware of how their behavior may affect others.
- Challenge unacceptable behavior wherever possible as long as it is safe to do so. Forms of intervention include: calling out behavior that is unacceptable when it happens and addressing the person who is behaving inappropriately; taking steps to defuse the situation/redirect those involved; checking in with the recipient of the behavior after it has taken place, assuring them that what occurred was not acceptable.



- Report incidents of Prohibited Conduct when witnessed and/or support recipients of Prohibited Conduct in reporting it.
- Cooperate in investigations into alleged Prohibited Conduct.

## 10. Raising concerns

What should I do if I have perpetrated Prohibited Conduct or been accused of doing so?

If you have, or are concerned that you have, engaged in Prohibited Conduct (intentionally or otherwise), you should take responsibility for your actions as soon as you can, as they may amount to Prohibited Conduct. This is important as it may prevent the recipient of your behavior from experiencing further trauma. This applies even if you deny the alleged conduct or do not consider the alleged conduct to be connected to work. A failure to report this could amount to gross misconduct in itself.

If, at any time, you are asked (verbally or in writing) by someone who considers your behavior to amount to Prohibited Conduct to stop, you must not persist in that behavior. You should report the incident to your manager or the POPS team who will investigate it in accordance with Eficode policies.

Remember that everyone has the right to decide what behavior is acceptable to them and to have their feelings respected by others. An authentic apology and genuine assurance that the behavior will not be repeated may be enough to end the matter. However, in some cases a direct apology without a third party to facilitate may not be appropriate and advice from POPS should be sought in advance. You should be sensitive to the reaction/potential reactions of the recipient. If the recipient refuses to accept your apology or is upset further by it, you should not persist in contacting them.

What should I do if I am the recipient of Prohibited Conduct?

You can report any concerns to your manager or the POPS team. In some cases, you may feel able to ask the perpetrator to stop the behavior. If that is ineffective, or you do not feel able to do this, an informal discussion with POPS can be a useful way of talking through what has happened and deciding what further action you wish to take. Such discussions will be dealt with in confidence as would any other sensitive personal matter relating to work. However, if the Prohibited Conduct is of such a serious nature because of the high immediate risk to the safety of the complainant, or others with whom the perpetrator may come into contact, then Eficode may need to take further action.



Recipients of Prohibited Conduct are encouraged to report any instances experienced. Reporting is an important step in preventing the behavior and is important to the recipient's ongoing health, safety and wellbeing, and will enable them to access appropriate guidance and support. However, we recognise that there may be many reasons that someone who has experienced Prohibited Conduct may not report it and we are committed to making it easier and less stressful to do so.

## What should I do if I have witnessed Prohibited Conduct?

You do not have to be the recipient or target of Prohibited Conduct to raise a concern or make a complaint. If you see it happening or become aware of it, you should report it provided it is safe to do so and you feel able to do so. We recognise that past experience of Prohibited Conduct may make this difficult. Your actions can be important in helping create a culture free from Prohibited Conduct and ensuring that there are no bystanders. Tackling Prohibited Conduct is everybody's responsibility. Those who have witnessed Prohibited Conduct can use the reporting mechanisms outlined below.

# 11. Reporting mechanisms

It is important that any concerns are reported as you may be the first to formally raise something that has been occurring for some time.

We retain the right to investigate concerns that we become aware of even if these are based on anonymous reporting or complaints are withdrawn. Our ability to investigate and take action may be restricted in these circumstances, and we will act with respect and empathy towards any person who has raised a concern but no longer wishes to be involved in the process. As an employer, we may still pursue matters if it is appropriate and proportionate to do so. This is important to ensure that we can tackle concerns about potential Prohibited Conduct within the organization.

## Informal reporting

An informal discussion with your manager can be a useful first step in talking about what has happened. This may be followed by a formal report. As stated above, although the wishes of the complainant to keep the report on an informal footing will be adhered to wherever possible, there may be some circumstances where the Prohibited Conduct is of such a serious nature that Eficode will need to take action because of the high immediate risk to the safety of the complainant, or others with whom the perpetrator may come into contact with. In such situations, we will put in place appropriate safeguards, such as instigating a formal investigation with suspension, or transfer of the alleged perpetrator, to prevent further incidents.





## Formal reporting

If informal action does not stop the Prohibited Conduct, or a formal report is made, a formal grievance should be initiated in line with the law of the local Eficode Group entity where the complainant is employed.

## Anonymous reporting

If you need to raise a Prohibited Conduct concern confidentially and anonymously you may report through the whistleblowing channel, as outlined in the Eficode Whistleblowing Policy and if you are employed within the UK or USA as outlined in the Public Interest Disclosure ('Whistleblowing') Policy. It may not be possible to take direct action against any individual perpetrator of Prohibited Conduct in response to an anonymous report, but the data generated from such reports will be gathered and stored in compliance with data protection laws. This can be very important in revealing a pattern of behavior.

## Reporting to an external third party including the police

A person may also report concerns about Prohibited Conduct to the police or a third party when they consider it appropriate to do so. Personal safety is paramount and where a person has any concerns about criminal behavior being involved we recommend reporting to the police. If a person is unsure what is appropriate we encourage reaching out to POP's prior to making an external complaint.

# 12. Outcomes and sanctions following a report of Prohibited Conduct

In some cases the outcome of a complaint under the grievance procedure may be an informal resolution, such as an apology or mediated discussion with the alleged perpetrator about how their behavior is received, or that the matter is not found to amount to Prohibited Conduct. If this is the case the information will be provided to the complainant and any alleged perpetrators. There will be support provided in dealing with the outcome.

If a complaint of Prohibited Conduct is upheld, then it may progress to a disciplinary process. The outcome of that disciplinary process could range from no sanction, to a sanction including warnings, and dismissal (with or without notice). These steps will be taken in accordance with the local Eficode Group entity disciplinary procedure.

All Eficode People shall be protected from intimidation, victimization or discrimination for making a complaint of Prohibited Conduct in good faith or for assisting in an investigation. Such retaliation will be handled as a disciplinary offence.