## **ANTI-HARASSMENT**

# **POLICY**

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## **STATEMENT**

Dietsmann is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work.

Dietsmann does not tolerate acts of harassment committed by employees, or by third parties against its employees. Harassment can be a criminal offence, punishable by fines and even imprisonment. Harassment is unacceptable both in the work place and in any work-related setting outside of the work place such as business trips or business-related social events.

#### **Definition of harassment**

"Harassment" consists on any unwanted and repetitive conduct that violates an individual's dignity or constitutes victimization, or which creates an intimidating, bullying, abusive, hostile, degrading, humiliating, offensive or otherwise uncomfortable environment. This includes harassment related to the protected characteristics of sex, race, national origin, ethnic origin, age, disability, sexual orientation, gender reassignment, religion or belief. It can involve a single incident or may be persistent and may be directed towards one or more individuals.

## **OUR COMMITMENTS**

The following list is not exhaustive but is intended to provide a number of examples of unacceptable behavior that Dietsmann is committed to prevent:

- Unwanted physical contact such as unnecessary touching or brushing against another employee's body, patting, pinching, insulting or abusive behavior or gestures, physical threats, assault, coerced sexual intercourse or rape;
- Unwanted verbal conduct such as unwelcome advances, patronizing nicknames, propositions or remarks, innuendo, lewd comments, jokes, banter or abusive language, which refer to an individual or a group's race, nationality, ethnic origin, age, language, religion or similar belief, political or other opinion, affiliation, gender, gender reassignment, sexual orientation, marital status or civil partnership, connections with a national minority, national or social origin, property, birth or other status, family connections, or disability, etc.;
- Unwanted non-verbal conduct such as graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, display of pornographic or sexually suggestive literature, pictures, films, objects, or inappropriate use of network systems for this purpose;
- Bullying, including persistent inappropriate criticism and personal abuse and/or ridicule, either in public or private, which humiliates or demeans those involved;
- Any other conduct that denigrates an individual or group.



## AGREEMENT TO FOLLOW THIS POLICY

The anti-harassment policy is fully supported by the shareholders and the Board of Directors.

Any suspected deviation or act of harassment, whether you are a victim or a witness, must be reported to the direct superior or to the Dietsmann Ethics Committee via the following e-mail address <a href="mailto:ethics@dietsmann.com">ethics@dietsmann.com</a>, as described in the Business Code of Conduct & Ethics policy.

## **OUR DISCIPLINARY PROCEDURES**

Dietsmann has adopted internal grievance and disciplinary policies and procedures that can be found in the Business Code of Conduct & Ethics policy document.

All allegations of harassment are dealt with seriously and in strict confidentiality.

Any person\* found to have harassed, bullied and/or victimized may constitute gross misconduct. The Discipline Policy procedures, whether formal or informal, may be invoked where there is evidence of misconduct and/or gross misconduct. This could lead to disciplinary action, going from verbal warning to contract termination, in accordance with applicable labor law regulations.

**Cesare Canevese** 

Chief Executive Officer

June 2023