



**ANTI-VIOLENCE
AND
HARASSMENT
POLICY**

**January, 2024
Version LEG-01.V02.EN**

Contents

1. Intent.....	3
2. Definitions.....	3
3. Guidelines.....	4
4. Application of this Policy.....	4
5. Reporting Violence or Bullying	5
6. Investigating Reports of Violence or Bullying	5
7. Investigating Reports of Discrimination or Harassment	5
8. The Right to Refuse Unsafe Work	6
9. Special Circumstances	6
10. Fraudulent or Malicious Complaints	6
11. Disciplinary Measures	6
12. Confidentiality	6
13. Managing and/or Coaching	6

1. Intent

1.1 PharOS is committed to building and preserving a safe, productive and healthy working environment for its employees based on mutual respect. In pursuit of this goal, PharOS does not condone and will not tolerate acts of violence or harassment/bullying against or by any PharOS employee. Through application of this Policy and by education of employees, PharOS will seek to prevent, correct and discipline behavior that violates this Policy.

2. Definitions

2.1 Workplace Violence or Bullying: Workplace Violence or Bullying is the exercise, statement or behaviour of physical force by a person against another person, in a workplace, that causes or could cause physical injury to this person, such as:

- Physical acts (e.g., hitting, shoving, pushing, kicking, sexual assault, throwing an object at another person, kicking an object another person is standing on, such as a ladder, or trying to run down another person using a vehicle or equipment).
- Any threat, behaviour or action which is interpreted to carry the potential to harm or endanger the safety of others, result in an act of aggression, or destroy or damage property.
- Disruptive behaviour that is not appropriate to the work environment (e.g., yelling, swearing).

2.2 Domestic Violence: a person who has a personal relationship with another employee— such as a spouse or former spouse, current or former intimate partner or a family member – may physically harm, or attempt or threaten to physically harm, that employee at work. In these situations, domestic violence is considered workplace violence.

2.3 Personal Harassment: any unsolicited, unwelcome, disrespectful or offensive behaviour that an underlying sexual, bigoted, ethnic or racial connotation and can be typified as:

- Behaviour that is hostile in nature, and/or intends to degrade an individual based on personal attributes, including age, race, nationality, disability, family status, religion, gender, sexual orientation, and/or any other human rights protected grounds.
- Sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome.
- Reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement to the person.
- Unwelcome remarks, jokes, innuendoes, propositions, or taunting about a person's body, attire, sex or sexual orientation and/or based on religion.
- Suggestive or offensive remarks.
- Bragging about sexual prowess.
- Offensive jokes or comments of a sexual nature about an employee.
- Unwelcome language related to gender.
- Displaying of pornographic or sexist pictures or materials.

- Leering (suggestive persistent staring).
- Physical contact such as touching, patting, or pinching, with an underlying sexual connotation.
- Sexual assault despite gender.
- Any actions that create a hostile, intimidating or offensive workplace. This may include physical, verbal, written, graphic or electronic means.
- Any threats of physical violence that endangers the health and safety of the employee.

2.4 Racial/Ethnic Harassment: any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their colour, place of birth, citizenship, or ancestry. Examples of conduct which may be racial or ethnic harassment include:

- Unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin.
- Colour, place of birth, citizenship, or ancestry.
- Displaying racist or derogatory pictures or other offensive material.
- Insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment.
- Refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

3. Guidelines

3.1 PharOS is committed to providing a safe and healthy work environment free from violence, threats of violence, discrimination, harassment, intimidation and any other misconduct.

3.2 It is also a violation for anyone to knowingly make a false complaint of violence or harassment or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action, as these are described in the Internal Labor Regulation and applicable laws.

3.3 This Policy prohibits reprisals against individuals, acting in good faith, who report incidents of workplace violence or act as witnesses. Management will take all reasonable and practical measures to prevent reprisals, threats of reprisal, or further violence. Reprisal is defined as any act of retaliation, either direct or indirect.

3.4 PharOS will ensure that all employees are trained and educated on violence and harassment and that they are clear about the roles and responsibilities as well as this Policy and its procedures. In addition a copy of this Policy will be made available to all employees.

4. Application of this Policy

4.1 This Policy applies to all individuals working for the organization including front line employees, temporary employees, contract service providers, contractors, all directors, heads, managers, supervisors, specialists, or officers. The organization will not tolerate violence or personal harassment whether engaged in by fellow employees, directors, heads, managers, supervisors, specialists, officers, or contract service providers of the organization.

4.2 PharOS will not tolerate any form of harassment or discrimination against job candidates and employees on any grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

4.3 All PharOS employees are personally accountable and responsible for enforcing this Policy and must make every effort to prevent discrimination or harassing behaviour and to intervene immediately if they observe a problem or if a problem is reported to them.

4.4. For the purposes of this Policy, harassment/bullying can occur:

- At the workplace
- At employment-related social functions
- In the course of work assignments outside the workplace
- During work-related travel
- Over the telephone, if the conversation is work-related or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship

5. Reporting Violence, Bullying, Discrimination or Harassment

5.1 In the event that an employee is either directly affected by or witness to any violence in the workplace, it is imperative for the safety of all PharOS employees that the incident be reported without delay according to the terms and conditions of the Whistleblowing Policy of PharOS. Reporting any violence or potentially violent situations should be done immediately via the Whistleblowing policy (SpeakUp procedure) of PharOS

6. Investigating Reports of Violence or Bullying

6.1 The Company Shall:

- investigate all reported acts / incidents of violence, and:
- consult with other parties (i.e. Legal Counsel/Manager).
- take all reasonable measures to eliminate or mitigate risks identified by the incident.
- document the incident, its investigation, and corrective action taken.
- review this Policy and hazard assessments annually, or as changes to job responsibilities or environments occur, and revise the assessment as needed.
- review annually, in conjunction with review of hazard assessments, the effectiveness of actions taken to minimize or eliminate workplace violence and make improvements to procedures, as required.

7. Investigating Reports of Discrimination or Harassment

7.1 Once a written complaint has been received, PharOS will complete a thorough investigation according to the terms and conditions of the Whistleblowing Policy of PharOS (SpeakUp procedure). Harassment should not be ignored as silence can, and often is, interpreted as acceptance. Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they rejected sexual advances or because they lodged a complaint when they honestly believed they were being harassed or discriminated against.

8. The Right to Refuse Unsafe Work

8.1 This is a legal right of every employee. PharOS is committed to ensuring a safe workplace.

9. Special Circumstances

9.1 Should an employee have a legal court order (e.g. restraining order, or "no-contact" order) against another individual, the employee is encouraged to notify his or her supervisor, and to provide a copy of that order to the Head of Human Resources. This will likely be required in instances where the employee strongly feels that the aggressor may attempt to contact that employee at PharOS, in direct violation of the court order. Such information shall be kept confidential.

9.2 All records of workplace violence and harassment, and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law.

9.3 In cases where criminal proceedings are forthcoming, PharOS will assist police agencies, lawyers, insurance companies, and courts to the fullest extent.

10. Fraudulent or Malicious Complaints

10.1 This Anti-Violence and Harassment Policy must never be used to bring fraudulent or malicious complaints against employees it is important to realize that unfounded/frivolous allegations of personal harassment may cause both the accused person and the Company significant damage. If it is determined by the Company that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal without further notice.

11. Disciplinary Measures

11.1 If it is determined by the Company that any employee has been involved in a violent behaviour, unacceptable conduct or personal harassing, immediate disciplinary action will be taken, as these are described in the Internal Labor Regulation.

11.2 For the purposes of this Policy the Group Head of Human Resources and Administration shall act as a workplace coordinator with respect to workplace violence and harassment issues.

12. Confidentiality

12.1 PharOS will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. PharOS will protect this privacy so long as doing so remains consistent with the enforcement of this Policy and adherence to the law. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation or disciplinary action. Any disciplinary action will be determined by the Company and will be proportional to the seriousness of the behaviour concerned.

12.2 PharOS will also provide appropriate assistance to any employee who is victim of discrimination or harassment.

13. Managing and/or Coaching

13.1 Counselling, performance appraisal, work assignment, and the implementation of disciplinary actions is not a form of personal harassment, and the Policy does not restrict a manager/supervisor's responsibilities in these areas.