



Anti-Harassment Policy

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INTRODUCTION

Preventing harassment in Clipper is a critical issue for the Organization, as it can negatively impact on employee's well-being, morale, productivity, and retention. Clipper takes several steps to prevent harassment.

Policy statement

This company policy intends to prevent harassment of any type, including sexual harassment of its employees, customers, partners and clients and to deal quickly and effectively with any incident that might occur.

Commitment and purpose

Clipper is committed to fostering a harassment-free workplace where all employees are treated with respect and dignity. Clipper wishes to protect employees from harassment based on race, national or ethnic origin, color, religion, age, sex, sexual orientation, marital status, family status or disability.

Harassment at Clipper is not tolerated. Employees who are found to have harassed another individual may be subject to disciplinary action. This includes any employee who: interferes with the procedure of a harassment complaint; retaliates against an individual for filing a harassment complaint; or files an unfounded harassment complaint intended to cause harm.

Application

This policy applies to all current employees of Clipper including full and part-time, casual, contract, permanent and temporary employees. This policy also applies to partners and clients. This policy applies to all behavior that is in some way connected to work, including during off-site meetings, training and on business trips.

Partners & Clients (Third parties)

This policy also aims to address employee harassment coming from people outside of Clipper and that is in some way connected to work, including during off-site meetings, training and on business trips.

DEFINITION

Harassment

Harassment occurs when one or more individuals regularly or repeatedly in a crude manner – expose one or several other individuals to violating actions, which are considered hurtful or degrading. It becomes harassment when the targeted person is unable to defend themselves. Teasing that is mutually perceived as good-hearted or isolated conflicts are not considered harassment.

Examples of harassment include:

Verbal and psychological Abuse:

- Hurtful comments
- Attacks against the affected person or criticism of their private lives
- Belittlement of the affected person's job, work effort or competencies
- Non-objective deprivation or reduction of responsibility and assignments
- Vicious teasing
- Ridicule or telling-off

Social Exclusion and isolation:

- Backbiting or spreading rumors
- Hostility or silence as response to questions or attempts at making conversation
- Exclusion from social and professional community

Professional Undermining:

- Necessary information being withheld
- Unjustified reduction of responsibilities and assignments

Discrimination and Humiliation:

- Belittlement or humiliation due to race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status or disability

Above examples are not exhaustive. Any behavior that creates a degrading, threatening, or offensive work environment may be considered harassment, regardless of whether it was intentional.

Sexual harassment

We talk about sexual harassment when one or more persons expose one or more persons to actions of a sexual nature, which the affected person considers offensive.

It may be difficult to distinguish between compliments, convivial touches and actual harassing actions. This makes it difficult for the affected person to determine when an action can actually be characterized as sexual harassment and when the affected person therefore must try to back out.

Sexual harassment is a special kind of harassment and is about both sex and power. We believe that the decided factor is whether the affected person believes his or her boundaries have been overleaped. It is therefore immaterial whether the actions are the result of thoughtlessness or a specific wish to offend the affected person.

Examples of sexual harassment include:

- Unwanted touches
- Hints/unwanted verbal encouragement to sexual intercourse
- Dirty jokes and gestures
- Irrelevant inquiries about sexual topics
- Showing of pornographic images
- Stalking

RESPONSIBILITIES AND EXPECTATIONS

Clipper is responsible for providing all employees a harassment-free workplace.

The CEO and People & Culture are responsible for:

- Ensuring that this policy is applied in a timely, consistent, and respectful manner.
- Determining whether allegations of harassment are substantiated.
- Determining what corrective action is appropriate where a harassment complaint has been substantiated.
- Ensure training of leaders and employees.
- Ensure that this policy is communicated to all employees and provide training on the importance of reporting violations and the procedures to follow.

Leaders are responsible for:

- Fostering a harassment-free work environment and setting an example about appropriate workplace behavior.
- Dealing with harassment situations immediately upon becoming aware of them, irrespective of whether a harassment complaint has been made or not.
- Taking appropriate action during a harassment investigation.
- Ensuring harassment situations are dealt with in a sensitive and confidential manner.

Employees are responsible for:

- Treating others with respect in the workplace and during off-site meetings, training and on business trips.
- Reporting harassment to People and Culture and management.
- Cooperating with a harassment investigation and respecting the confidentiality related to the investigation process.

REPORTING PROCEDURE

Employees must inform People & Culture or their immediate leaders if they are exposed to harassment or know that others are being harassed. In case of harassment, People & Culture will discuss the problem at hand with the affected person's immediate leader.

If the harassment continues after a verbal warning, People & Culture will give a written warning or dismiss the person doing the harassment.

Filing a Complaint

An employee may file a harassment complaint by contacting People and Culture. The complaint may be verbal or in writing. If the complaint is made verbally, People and Culture will record the details provided by the employee. The employee should be prepared to provide details such as what happened, when it happened, where it happened, how often and who else was present (if applicable).

Complaints should be made as soon as possible after the incident, unless there are circumstances that prevented the employee from doing so.

People and Culture will tell the person that the harassment complaint has been made against, in writing, that a harassment complaint has been filed. The letter will also provide details of the allegations that have been made against him or her. Every effort will be made to resolve harassment complaints within 3 months. People and Culture will advise both parties of the reasons why, if this is not possible. If either party to a harassment complaint believes that the complaint is not being handled in accordance with this policy, he or she should contact the CEO.

Mediation

Wherever appropriate and possible, the parties to the harassment complaint will be offered mediation prior to proceeding with a harassment investigation. Mediation is voluntary and confidential. It is intended to assist the parties to arrive at a mutually acceptable resolution to the harassment complaint. The mediator will be a neutral person, agreed upon by both parties. The mediator will not be involved in investigating the complaint. Each party to the complaint has the right to be accompanied and assisted during mediation sessions by a person of their choosing.

Investigation

If mediation is inappropriate or does not resolve the issue, a harassment investigation may be conducted. All investigations will be handled by an individual who has the necessary training and experience. In some cases, an external consultant may be engaged for this

purpose. The investigator will interview the person who made the complaint, the person the complaint was made against and any witnesses that have been identified. All people who are interviewed will have the right to review their statement, as recorded by the investigator, to ensure its accuracy.

The investigator will prepare a report that will be submitted to People and Culture. Both parties to the complaint will be given a copy.

While investigating, we will consider the consequences for the parties involved. Not until all actions have been clarified, will they have consequences for the person doing the harassment. We believe that conflicts should be nipped in the bud and preferably by the immediate leader.

Whistleblower

Clipper have established a whistleblower scheme allowing employees, customers, or other stakeholders to report misconduct, unethical behavior, or illegal activities within Clipper, while providing anonymity. This allows Clipper to identify and address problems quickly, prevent fraud and other types of misconduct and protect employees who report wrongdoing from retaliation.

The scheme is easily accessible to all stakeholders including employees through a direct link on the [Company website](#).

The whistleblower scheme is managed by external law firm to provide the necessary anonymity. Clipper will investigate all reports of misconduct received through the whistleblower scheme and take appropriate action to address the issue. The Whistleblower scheme plays a crucial role in promoting transparency, accountability, and ethical behavior within Clipper.

Privacy and Confidentiality

All parties to a harassment complaint are expected to respect the privacy and confidentiality of all other parties involved and to limit the discussion of a harassment complaint to those that need to know. Clipper and all individuals involved in the harassment complaint process will comply with all requirements of the European General Data Protection Regulation to protect personal information.

PREVENTION AND TRAINING

Clipper will continue to prevent harassment during regular training programs when deemed applicable and necessary, to educate them on what constitutes harassment, how to identify it, and what steps they can take to prevent it. (i.e., in-person, online-course, workshops, seminars)

CONSEQUENCES OF VIOLATING THE POLICY

If a harassment complaint is substantiated, People and Culture will, in conjunction with the relevant leader, decide what action is appropriate. Remedies for the employee who was harassed may include: an oral or written apology, therapy, or counselling. Corrective action for the employee found to have engaged in harassment may include: a warning, a demotion or termination. Both parties to the complaint will be advised, in writing, of the decision.

Clipper encourages all employees to take responsibility for creating a respectful workplace free from harassment and to report any instances of harassment they observe or experience.

REVIEW AND AMENDMENT

This policy was adopted by the Senior Management Team on 13 June 2025 and will be reviewed annually.