Policy against violence and harassment at work.

HOUSE OF HR

Policy against violence and harassment at work

1. Purpose

In line with our company **values and Code of Conduct and Ethics**, everybody has the right to work and also has the right to work in an environment free from any violence or harassment. House of HR strives to provide a safe, healthy and respectful work environment for all its people. As employment is at the heart of what we do, we strongly believe that everyone has the right to a world of work free from violence and harassment. House of HR recognizes the importance of a work culture based on mutual respect and human dignity in order to prevent violence and harassment.

House of HR recognizes the **United Nations International Labour Organization (ILO) Declaration** on Fundamental Principles and Rights at Work, and supports key principles on violence and harassment, freedom of association and the right to collective bargaining, the elimination of all types of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination as a means to ensure decent working conditions.

House of HR emphasizes the importance of creating a safe working environment where there is **no room for any form of violence or harassment**. This includes sexual harassment, abuse, threats, intimidation, bullying, mobbing or any other unacceptable and/or unlawful behaviour. We promote an environment of zero tolerance of violence and harassment to facilitate the prevention of such acts. Speaking up and taking action are key factors in creating a safe environment for all people at work.

This policy outlines the main principles relating to violence and harassment at House of HR and is **applicable** to our internal staff, consultants, temporary workers and persons in training, including interns and apprentices (in sum, our Happy Rebels), as well as candidates, contractors, workers whose employment has been terminated, volunteers, clients and other third parties. The policy is applicable at the workplace but extends to all work-related activities such as conferences and trainings, commuting to and from work, after-work events, etc.

Everyone is responsible for building and maintaining a safe and healthy workplace together. More specifically, **House of HR leaders bear a key responsibility** in acting in accordance with our core values and policies. They should not only lead by example, they should also support their team members in their efforts to uphold these principles and should act when they detect behaviour which is not in line with this policy.

2. Scope

This policy applies to House of HR and its **PowerHouses and Boutiques** ('Group'). In addition, we expect every PowerHouse and Boutique to implement the principles as set out in this policy in their day-to-day business. For this purpose, clear processes and procedures and tailored actions such as communication and training should be provided to all Happy Rebels and other parties where relevant. PowerHouses and Boutiques should also always seek to cooperate with external preferred partners, suppliers and other parties who adhere to the same principles in this respect.

3. Procedure

In line with House of HR's Code of Ethics and Conduct, which expresses a fundamental respect for the dignity of all human beings, this policy seeks to facilitate a safe and fair working environment with a clear statement of the expectations concerning conduct which may constitute violence and harassment.

3.1 Definitions

Violence and harassment imply a spectrum of harmful behaviour. This can be physical, psychological and/or sexual.

Violence implies the intentional use of power or force which might result in injury, maldevelopment, or psychological harm amongst other things. Violence can take several forms, including:

- Abuse: actions involving the disproportionate use of physical or psychological strength.
- Threats: announcements of an intention to harm a person or to damage their property.
- Assault: any attempted or actual physical injury to or attack on a person.

Harassment refers to any unwelcome and unacceptable act, whether of single occurrence or repeated, which might cause physical, psychological or sexual damage or create an intimidating, hostile, degrading or humiliating working environment. Examples of harassment include isolation, devaluation of a person's rights and opinions, verbal abuse, practical jokes, abuse of power or other unwelcome behaviour.

Sexual harassment is a specific type of harassment and includes any form of verbal, non-verbal or physical conduct of a sexual nature violating the dignity of a person. It includes both personal experience and awareness of the existence of sexual harassment. Sexual harassment can take many different forms and may include sexually oriented language, uninvited physical contact, references to sexual orientation or demands for sexual favours, either directly or by implication.

Gender-based violence and harassment means violence and harassment directed at persons because of their sex or gender or disproportionately affecting persons of a particular sex or gender.

Sexual orientation based violence and harassment means violence and harassment directed at persons because of their sexual orientation.

Bullying is repeated unreasonable behaviour by an individual that could reasonably be considered to involve humiliating, intimidating, threatening, demeaning or victimizing a person or a group of people.

Cyberbullying refers to unreasonable, repeated and harmful conduct via digital platforms. This is also known as online bullying. Examples include posting embarrassing photos on social media, sending hurtful message or threats via messaging platforms etc.

Mobbing involves a group of workers bullying one individual or a group of employees. It includes behaviours such as continually making negative remarks about or criticizing the individual or persons concerned, isolation, spreading gossip or ridiculing such individuals or persons.

3.2 Principles and responsibilities

Violence and harassment are broad concepts and can take many forms, which may be physical, verbal or non-verbal.
Examples of violence and harassment **at the workplace** include, but are not limited to:

- Misuse of authority, for example by restricting information
- Indecent assault or other criminal offences
- Abuse of personal data
- Persistent criticism or undermining of a person
- Jokes, suggestive comments or offensive gestures related to a person's disability, religious conviction, ethnicity or sexual characteristics
- Distribution or display of material regarded as offensive
- Repeated, unwanted name calling
- Persistent questions about a person's private life
- Unwanted physical contact
- Vandalization or hiding of personal belongings or work equipment

House of HR and all PowerHouses and Boutiques have a responsibility to take **all reasonable steps**, consistent with their duty of care, to:

- Ensure the health, safety and wellbeing of our Happy Rebels, candidates, visitors, contractors and customers;
- Support a working environment that is free from violence and harassment by establishing clear and tailored policies;
- Ensure that Happy Rebels, candidates, visitors, contractors and customers are informed of this by proper communication and awareness initiatives;

- Inform all stakeholders of their responsibilities under this policy through the implementation of training and awareness raising strategies; and
- Appoint proper persons of trust or establish whistleblowing channels to ensure that questions and concerns can be raised at the local level.

House of HR has zero tolerance of acts of violence or harassment. This not only applies in public and private spaces at the workplace, but also **extends to work-related activities** such as:

- Conferences, seminars, or training
- Work related trips
- Afterwork events
- Work related communications
- Provision of employer-provided accommodation, e.g. when providing housing facilities to people at work
- Commuting to and from work

We emphasize that attention should be paid to any form of violence or harassment especially when working remotely. As irregularities might be more subtle or difficult to detect, people should be mindful of any signals.
With regard to **verbal forms of violence and harassment**, these include several types of communication such as oral (e.g. speaking in person), written (e.g. in minutes of meetings) and electronic (e.g. using social media) communication.
House of HR promotes a culture of **transparency and openness**. Actions and conversations should be sincere, honest and mutually respectful. It is important to distinguish honest conversations and comments from harassment. House of HR leaders have a professional responsibility to challenge their teams and aim for high quality work and performance. Therefore, providing advice and constructive feedback, asking for performance improvements or stating a different opinion are part of the day-to-day responsibilities of a House of HR leader and do not generally constitute harassment.

3.3 Divergence from local legislation

House of HR, including its PowerHouses and Boutiques, must at all times comply (in letter and in spirit) with **all applicable national and international laws and regulations**. The legal framework on violence and harassment at work differs from country to country. Whilst some countries have specific legislation on workplace violence, there is usually a more general law on occupational health and safety or equal treatment which covers these aspects.

Where our policies and procedures on violence and harassment are stricter than local legislation requires, we always act in accordance with our higher standards. If local legislation is stricter, this takes precedence over what is provided in this policy.

3.4 Zero tolerance

We are committed to a respectful working environment and **do not tolerate** any form of violence, (sexual) harassment or bullying. All actions taken by fellow Happy Rebels, candidates, customers, suppliers or other third parties should be based on sincerity, fairness and mutual respect.

Any behaviour creating an offensive or hostile work environment will not be accepted and will be considered as a **violation** of this policy. Third parties or customers engaging in such behaviour will also be reprimanded.

Sanctions are determined in accordance with the circumstances in question and may include counselling, actions to redress acts of violence or harassment, use of disciplinary procedures, removal from position, civil action, or the reporting of actions to law enforcement officials, which may result in criminal charges.

A serious view will be taken of clear **abuse** of this policy by intentionally false accusations or allegations made in order to harm the reputation of another person which are found to be unsubstantiated. Where found to be intentional or malicious, they may result in disciplinary action.

3.5 Raising your questions and concerns

House of HR strives to create and maintain a healthy and safe work environment. Therefore, everyone can and should **raise awareness** if a violation of this violence and harassment policy is going on so that appropriate action can be taken. All reports will be treated confidentially and empathetically. Anyone who has **questions or doubts** about whether a situation violates the policy should speak up.

All breaches, questions, concerns and doubts can be raised via multiple channels:

1. The internet application "Spot": Spot allows you to raise sensitive issues in an accessible and, if desired, anonymous way. The customized workflow within Spot guides issue raisers throughout the process. Any issue will be addressed and followed up according to existing escalation procedures. Open the tool via talktospot.com/hohr of via the QR code.

2. You can contact your direct line manager or superior, the next level manager, the HR manager, your local compliance team or the person(s) of trust within your PowerHouse or Boutique.

3. If you believe the above channels to be insufficient or inappropriate, you can contact Thomas Decruy, the Group Chief Risk and Sustainability Officer (contact below).

House of HR ensures that persons covered by the scope of this policy will **not be victimized or penalized** for reporting alleged unreasonable behaviour. Any person who is found to have victimized a person will be subject to the consequences of breaching this policy.

In case of doubt or questions regarding this policy, please contact the Chief Sustainability and Risk Officer to review the matter:

Thomas Decruy
Chief Risk and Sustainability Officer
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4. Policy information

This policy is updated regularly to ensure its relevance over time. Below is the list of updates made to the policy.

Version	Date	Update
1.1	April 2023	Initial policy
1.2	February 05, 2026	'Policy information' section added

This policy has been approved by the ESG Committee on behalf of the Board of directors.