

AET Global Anti-Harassment and Bullying Policy



1. Scope

This policy covers all individuals working on shore at all levels and grades on behalf of any company within the AET Group in any capacity whatsoever, including without limitation, the senior management team, employees, consultants, contactors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as "Employees" throughout this policy).

This policy does not form part of any Employee's contract of employment and AET may amend it at any time.

In the event of a conflict between this policy and local laws, local laws will prevail.

2. Intent

As part of AET's overall commitment to equality of opportunity and valuing diversity, AET is committed to providing a working environment for all its employees that is free from all forms of bullying and harassment and where Employees are treated with respect and dignity. Harassment and/or bullying detracts from a productive working environment and can affect the health, confidence, morale and performance of those affected by it, including anyone who witnesses, or had knowledge of, the unwanted behavior.

All Employees are responsible for treating their colleagues with courtesy and respect and should consider whether their words or conduct could be offensive to others, even unintentional bullying is unacceptable. The policy sets out examples of the type of conduct that may constitute harassment or bullying and AET's commitment to eliminating such conduct.

Line Managers are responsible for ensuring that the standards set by this policy are observed, that their own conduct sets a good example in this respect and that all complaints are promptly handled.

AET expects all Employees to be familiar with the Anti-Harassment and Bullying policy to ensure that they conduct themselves at all times in a manner which is not likely to offend any other Employee or clients of the company.

3. Policy Body

3.1 What is Harassment?

Harassment in general terms, is any unwanted conduct affecting a person's dignity in the workplace or conduct which creates an intimidating, hostile, degrading, humiliating or offensive work environment. It may be physical, verbal or some other form of communication including telephone calls or emails, texts or messages, social media posts, cartoons, lewd posters, jokes or gestures. Actions or comments which you may consider to be harmless may not be appreciated by the recipient in the same light. The recipient might view such behavior as demeaning and unacceptable.

Harassment may take many different forms and it can be persistent and repeated, including after the person subjected to it makes it clear that the actions should stop. A single instance can also constitute harassment if it is sufficiently serious.

Unlawful harassment is dependent on which country you are in but may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, color, nationality, ethnic or national



origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

There are various forms of unacceptable behavior such as:

- a. Unwanted physical conduct which can range from touching, pinching, pushing or brushing past someone or invading an individual's personal space, to grabbing, shoving, punching, kissing, cornering and more serious forms of physical or sexual assault;
- b. Unwelcome sexual behavior, which the harasser may perceive as harmless like flirting, and which may involve unwanted suggestions, advances, propositions or pressure for sexual activity;
- c. Where submission to sexual harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances (known as "quid pro quo");
- d. Where the harassment creates an offensive and unpleasant working environment (known as a "hostile work environment");
- e. Request for sexual favors;
- f. Continuous suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome (including repetitive unwelcome requests for dates);
- g. Inappropriate behavior whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks;
- h. The sending or displaying of material that is pornographic or obscene or that some individuals or groups may find reasonably offensive (including e-mails, text messages, video clips and photographs taken or sent using mobile phones or via the internet);
- i. Ignoring or shunning an individual, for example, by deliberately excluding the individual from a conversation or a workplace social activity;
- j. Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- k. Outing or threatening to out someone as gay or lesbian; or
- l. Mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

3.2 What is Bullying?

Bullying is 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 include both personal strength and the power to coerce through fear or intimidation.

Bullying is largely defined by the impact of an individual's behavior on the recipient and can take the form of physical, verbal and non-verbal conduct.

Direct forms of bullying include:

- Open aggression, threats, intimidation, shouting abuse or obscenities;
- Subjecting an individual to humiliation or ridicule, belittling his/her efforts, often in front of others;
- Without justification, removing an individual's whole area of work responsibility from the individual or reducing the job to routine tasks that are below his/her skills and capabilities;
- Ostracizing or marginalizing an individual by unreasonably excluding that person from discussions, decisions etc.; or



- Spreading malicious rumors about the individual.

Indirect forms of bullying are usually acts which are committed repeatedly including:

- Subjecting an individual to excessive supervision without justification, excessive monitoring of his/her work and being overly critical about minor things;
- Constantly taking the credit for another individual's work, but never the blame;
- Deliberately withholding information that an Employee requires in order to do his/her job effectively; or
- Blocking a reasonable request for leave and/or training.

3.3 If you are being harassed or bullied

If an Employee feels that they are being harassed or bullied, they must consider whether they feel able to raise the problem informally with the person responsible. Employees should explain clearly to them that their behavior is not welcome or makes them uncomfortable. If this is too difficult or embarrassing, Employees must speak to the HR, who can provide confidential advice and assistance in resolving the issue formally or informally.

3.4 Raising a formal complaint

Employees who wish to make a formal complaint should put their complaint in writing. This written statement will form the basis of the subsequent hearing and any investigations, so it is important that the Employee sets out clearly the nature of the harassment or bullying and includes as many details as possible.

The complaint should be sent to the Employee's Line Manager and HR. If the complaint is regarding the Employee's Line Manager (or the Employee feels uncomfortable raising the matter with their Line Manager), then the complaint may be sent to HR only.

It may be necessary to carry out an investigation into any allegations made by the Employee. Details of the investigation and the name(s) of the person making the complaint and the person accused will only be disclosed on a "need to know" and confidential basis. Investigations will be conducted in a timely and confidential manner. An investigation panel may be formed to investigate the allegations and will be conducted by someone with appropriate experience and no prior involvement in the complaint. Evidence gathered in the course of these investigations is confidential.

Once the investigation is complete, we will inform the Employee of the decision. If AET considers that the Employee has been harassed or bullied the matter will be dealt with under the AET Disciplinary Policy and may result in disciplinary action.

3.5 Protection and support for those involved

Employees who make complaints or who participate in good faith in any investigation will be protected against any form of retaliation or victimization as a result. Any Employee found to have retaliated against or victimized someone in this way will be subject to disciplinary action under the AET Disciplinary Policy.

4 **Cross References**

- AET Global Disciplinary Policy
- AET Global Grievance Policy
- AET Global Equal Opportunity Policy
- AET Code of Conduct and Business Ethics (CoBE)