

## Equal Treatment Policy

### Anti-victimization and harassment policy

The work environment and the corporate culture at NA-KD must be stimulating and permissive, and characterized by employee contentment, a sense of community and security. We do not accept discrimination, victimization or harassment in any form. All managers within the business must take both signs/reports of such behavior and the actual misconduct itself seriously, and then promptly and discreetly investigate the situation and ensure that unwelcome behavior ceases.

As an employee you are expected to contribute to a positive work environment, where we include one another in our community and show respect for one another. It is important to be willing to speak out or otherwise draw attention to a colleague who behaves in an unwelcome manner – no one should be party to concealing victimization or harassment.

Our work environment responsibility extends to all employees, as well as hired and contract labor and interns.

This policy covers events in the following contexts:

- In the workplace
- In a work situation or training situation outside the actual workplace
- In connection with applying for work.

All employees must be familiar with our procedures and our actions in situations where victimization or harassment has arisen, as this enables victims to get help and support quickly.

### What is the definition of discrimination?

Discrimination is when someone is disadvantaged or someone's rights are violated on the basis of seven defined grounds for discrimination:

- Gender
- Transgender identity or expression
- Ethnicity
- Religion or other belief
- Disability
- Sexual orientation
- Age

### What is the definition of victimization?

Victimization involves actions directed against one or more employees in an abusive manner, which could lead to ill health or their being placed outside the workplace community. It concerns phenomena that are commonly referred to as bullying, psychological abuse and social exclusion.

Some examples of victimization are:

- Withholding information
- A negative greeting or not greeting someone
- Slander and gossip
- Exclusion
- Use of master suppression techniques

### **What is the definition of harassment?**

Harassment is behavior that ridicules or disparages an employee and is linked to the seven grounds for discrimination, and it can take various forms, such as unwelcome physical, verbal or non-verbal conduct. Harassment can also be of a sexual nature. In addition to comments and words, there may be touching or suggestive looks. Harassment can also involve unwelcome compliments, invitations and suggestive remarks.

It is always the individual's perception of the situation that determines what is offensive. An employee who says that a particular behavior is unwelcome must be respected, and the behavior in question must cease immediately.

Knowingly victimizing or harassing a colleague is conduct that breaches the employment contract and is also prohibited by law. Therefore, disciplinary measures such as warnings, redeployment, termination or dismissal will be taken.

Temporary differences of opinion, problems cooperating or different perceptions of an issue are not considered to be a form of victimization but are perfectly normal occurrences within a business. Having different opinions should be accepted and respected.

### **Prevention**

- All our managers receive work environment training, which includes dealing with victimization in order to understand the contexts in which this may arise and how action plans should be developed.
- Within the framework of our systematic work environment management, all managers should investigate risks of victimization and harassment, and take action to minimize risks.
- All new employees must be told where they can find this policy.
- All employees are responsible for notifying their immediate manager, HR or a safety representative if there are indications that victimization or harassment may arise or has arisen.
- Each manager must take an active approach to ensuring open and reciprocal communication within the group, and resolve conflicts quickly.