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Instructions Relating to Victimization and Harassment

1 Introduction

- 1.1 OX2 shall provide a place of work where everyone is treated with respect and where all activities are firmly entrenched in humanistic values. No employees, job applicants or other persons linked to the company should be subjected to victimization, harassment or discrimination.
- 1.2 OX2 condemns all forms of victimization, harassment and discrimination and does not in any way tolerate its occurrence at OX2's workplaces.
- 1.3 These instructions are based on the Swedish Work Environment Authority's Regulations and General Guidelines on the Organisational Social Work Environment (AFS 2015:4) and on Systematic Work Environment Management (AFS 2001:1), the Swedish Discrimination Act 2008, OX2's Code of Conduct, OX2's Work Environment Guidelines, OX2's Instructions Relating to Systematic Work Environment Management and OX2's Gender Equality and Diversity Policy.

2 Definitions of Victimization and Harassment

- 2.1 *Victimization* (bullying) means actions in an abusive manner at one or more employees that may lead to ill health or to exclusion from the workplace community. Examples of victimization (bullying) can be
 - To exercise excessive control and constantly look for shortcomings.
 - To withhold work-related information, which makes it more difficult for an employee to do its job.
 - To slander or malign someone so that the person is seen as worse than others.
 - To mock or ridicule someone.
 - To punish twice or to put someone in front of a choice and devalue or punish the person whatever choice he or she makes.
 - To objectify, comment on or discuss someone's appearance in contexts where it is insignificant.
 - Violence or threats of violence, to use physical force to get one's will through, or to point out that the possibility exists.
- 2.2 *Harassment* comprises two parts as follows:
 - 2.2.1 Harassment is a form of discrimination and is defined in the Discrimination Act 2008 as a conduct that violates the dignity of a person and is associated with one of the grounds of discrimination: sex, transgender identity or expression, ethnicity, religion or other

belief, disability, sexual orientation or age. Examples of harassment include, inter alia, xenophobic, and insulting statements, and generalisation of ethnic or religious groups.

2.2.2 'Sexual harassment' is defined in the Discrimination Act 2008 as conduct of a sexual nature that violates someone's dignity. Sexual harassment may involve unwelcome touching, groping, propositions, jokes, jargon, or objectionable images as well as offensive and generalised statements.

- 2.3 Harassment is unacceptable. However, what is regarded as unacceptable may vary from person to person. The same behaviour may constitute harassment for one person while another person is not adversely affected at all. It is always the person who has been subjected to the harassment who determines what behaviour is acceptable and what is regarded as unwelcome. A behaviour assumes the character of harassment if it continues despite the fact that the subject has made it clear that it has been understood as offensive. If the behaviour is overt it may, however, be offensive on only a single occasion.
- 2.4 Actions violating the dignity of a person which are not associated with one of the grounds of discrimination may constitute an act of victimization (bullying).

3 Preventative Measures Against Victimization and Harassment

- 3.1 OX2 shall prevent the occurrence of victimization and harassment and make sure that such behaviour is detected at an early stage. In order to fulfil its responsibilities OX2:
- Works continuously with systematic work environment management and identifies risk factors that can lead to victimization or harassment. Examples of risk factors are conflicts, dissatisfaction, high workload, bad treatment, lack of dialogue/communication, ambiguity in roles and changes in the organization.
 - Has adopted instructions on victimization and harassment which has been given to managers as well as Safety Representatives at OX2's worksites.
 - Has routines that ensures that these instructions are followed up and adjusted continuously.
 - Ensures that managers and other key persons/subordinated managers receive relevant education on victimization and harassment and how to detect such behaviour as well as training in communication, conflict management and other work environment related issues.
 - Has informed safety representatives of behaviours which may constitute a victimization or harassing behaviour and how they should prevent such behaviour from occurring at OX2's workplaces.
 - Has adopted an action plan which is revised continuously.
 - Has as a routine to raise questions relating to victimization and harassment at employee meetings, in employee surveys, at workplace meetings as well as during safety inspections.
 - Ensures that every new employee receives a good introduction containing information on OX2's position on victimization and harassment.
 - Uses checklist from Prevent to increase knowledge about OX2's work environment, victimization and harassment and legal requirements (<https://checklists.prevent.se/checklist/answer/208>).

4 If Victimization is Found or Suspected

- 4.1 If OX2 suspects or finds that victimization or harassment occurs at any of OX2's workplaces, OX2 shall take the measures that are necessary for the conclusion of victimization or harassment. Managers have the ultimate responsibility to immediately act in these matters. All issues of this nature must be processed quickly, confidentially and with respect for vulnerable persons.
- 4.2 Information about perceived victimization or harassment can come to a manager's or other supervisor's attention in different ways, e.g. through own observations, directly from the person exposed to the behaviour, from a Safety Representative or via OX2's incident reporting system (Whistleblowing system).
- 4.3 The obligation to investigate victimization or harassment arises as soon as it comes to a manager's or other supervisor's attention that an employee has experienced or feels that he or she has been a victim of victimization or harassment. No proof is required that something has happened. The purpose of the investigation is to obtain sufficient information and knowledge about the situation, so that the investigator responsible can assess whether victimization or harassments is at hand.
- 4.4 The investigation shall be conducted based on the Swedish Work Environment Authority's Regulations and General Guidelines on the Organisational Social Work Environment (AFS 2015:4) and shall be documented in writing. An inadequate investigation of victimization may be harmful to both the work environment and employee health. The situation should therefore be investigated by someone who has adequate expertise, is able to act impartially, and is trusted by the involved parties.

5 Investigation

- 5.1 It is important that the employee subjected to victimization or harassment is informed in advance about the measures that will be taken and the help he or she can receive in light hereof, e.g. through Occupational Health Service.
- 5.2 Measures should start with a conversation with the employee subjected to victimization or harassment. This person decides whether the matter shall be further pursued. If the matter is further pursued, a private conversation shall take place with the person accused of the conduct, or through mediation where both parties meet with an external impartial party.
- 5.3 The company has an obligation to both listen and talk to those involved and to be completely impartial and objective regarding the issue.
- 5.4 If the investigation is to further proceed, this should be more formal and potential witnesses should be questioned. The parties involved are entitled to have a person to support them during this process and must be kept informed about what is happening in the matter.
- 5.5 Any measures must always be directed at the person who is perpetrating the victimization or harassment and not at the person subjected to this conduct.

6 Remedy

- 6.1 OX2 shall, inter alia, take the following measures in order to remedy victimization or harassment:
- Make the person(s) who is victimizing or harassing aware of that the behaviour is perceived as victimization or harassment.
 - Clearly state that OX2 condemns such behaviour and that it shall cease immediately.

- Make the employees aware of that repeated misconduct may lead to disciplinary measures and, in the long run, termination of the employment.
 - Follow up with the offender and the victim, as well as with others affected by the events.
 - Have increased supervision and pay special attention to situations that might impose risk of victimization or harassment (see Section 3.1).
- 6.2 Sanctions that may come into question include, for example, redeployment, written disciplinary reminder, warning, and, in very serious cases, notice of termination or dismissal. A police report must always be made if a crime is suspected.
- 6.3 If a person takes sick leave because he or she has been subject to victimization or harassment, this must be notified to the Swedish Work Environment Authority and the Swedish Social Insurance Agency. The notification shall be sent to www.anmalarbetsskada.se.

7 What Should a Victim, a Colleague or an Accused do?

- 7.1 OX2 and its employees shall cooperate to prevent victimization and harassment from occurring at any of OX2's worksites. In light hereof, OX2 expects from each and every employee to prevent victimization and harassment by considering their choice of words and conduct, discouraging unacceptable behaviour from others and supporting those subjected to such treatment. Further, all employees have a responsibility, when applicable, to provide their colleagues with guidance on the prevention of victimization and harassment.
- 7.2 Any victim of victimization or harassment or any colleague of such person shall:
- Have the courage to speak out. Confront the person who is perpetrating the victimization or harassment directly, verbally or in writing. Discuss how the behaviour is perceived and demand that it ceases immediately.
 - Keep notes, including dates, times, places, witnesses, of what the person perpetrating the victimization or harassment said or did, as well as your reactions and feelings. These notes provide good support if the victimization or harassment continues.
 - Make a report to your immediate manager, HR/People, CEO and/or Safety Representative.
 - If above does employees can anonymously take up the problem via a reporting tool - the whistleblower channel. The whistleblower channel is run by a third party, and OX2's employees can report problems in their own language (Swedish, Finnish and English) via the web portal <https://report.whistleb.com/en/PeasIndustries>.
- 7.3 OX2 advises any employee subject to victimization or harassment or suspected victimization or harassment to talk to:
- A colleague,
 - Their immediate manager, HR/People or CEO,
 - A Safety Representative, or
 - The person perpetrating making it clear that the victimization or harassment is not tolerated.
- 7.4 If there is a suspicion that another employee has been subjected to victimization or harassment, OX2 advises the employees to:
- Do everything you can to avoid anyone being excluded.

- Speak out and take notice if someone is behaving in an offensive way or harassing others.
- Step up – do not rely on someone else to do so.
- Speak to the person affected.
- Speak to your immediate manager about your suspicions.
- If necessary, and measures are not taken, contact HR/People, CEO, a Safety Representative, or the Occupational Health Service.
- Reports may also be made using the Whistleblowing tool (see Section 7.2).

7.5 OX2's advice to an employee accused of victimization or harassment:

- Think about what was said and done.
- Think through the situations in which you are victimising and/or harassing. You may not agree with the person but respect their feelings of what has happened.
- Speak to your immediate manager or a Safety Representative.
- Apologise to the employee(s) subjected to the conduct.

8 Follow-up

This document is followed up annually or at an earlier point in time and revised when necessary.

References

Documents referring to this document:

Document name (link)	Description
Process document template	

Revision history

Revision index	Description	Date	Issued by	Approved by
0	First issue	2021-02-01	Markus Rydmell	COO