



REGULATION

Ref no.: Z/04/2019

Policy on prevention of mobbing and other forms of discrimination

§ 1

1. Hereunder a system of monitoring events connected with employment and interpersonal relations in the Company is established, aiming at avoidance, limitation or counteracting any harmful types and effects of mobbing and other forms of discrimination at work.
2. Monitoring shall be conducted by the HR Department, based on regular information and personnel analyses, as well as based on additional analyses and research conducted in the form of surveys (also with engagement of external entities).
3. Principal information in the monitoring system come directly from employees. Any comments, insights or complaints or employees submitted in connection with any forms of mobbing and discrimination are treated with priority.

§ 2

1. Employees who think they have experienced any form of mobbing or discrimination shall be entitled to report this.
2. Also other employees, such as witnesses, may report such events.
3. Submissions may be made in the following manners:
 - a) verbal report to line manager,
 - b) written submission to line manager,
 - c) verbal report to senior manager (if the subject matter concerns relations between the employee and his/ her line manager),
 - d) written report to senior manager (if the subject matter concerns relations between the employee and his/ her line manager),
 - e) verbal report to the HR Department (the person authorized to receive submissions on discrimination, mobbing or molesting shall be the HR Manager),
 - f) written report to the HR Department (the person authorized to receive submissions on discrimination, mobbing or molesting shall be the HR Manager),
4. In case of submissions concerning relations between line managers and subordinates, the President of the Management Board may appoint a three-person committee to independently review the case. This committee shall be composed of: senior manager (head of the structure, which includes the organizational unit where the issue arose), HR Manager, representative of the Legal Department.

Meetings, works and findings of the Committee must be documented in writing.

5. Any submissions, regardless of their form, shall be registered by the aforementioned persons, reviewed in detail, promptly and maintaining confidentiality. Complaints should be



treated seriously, but also with caution and respect of rights of both reporting persons and persons against whom complaints are submitted.

6. As a result of undertaken explanatory proceedings, both parties (i.e. the person reporting on the mobbing or discrimination and the person against whom complaints are submitted) should have a possibility to present their standpoints.
7. During the review of the submission, in order to explain all circumstances and for evidence-related purposes the person who accepts the submission may demand a written confirmation of a verbal submission.
8. A written submission should include the following information:
 - a) defining first name and surname of the person against whom the complaint is made, as well as his/ her function or job position:
 - supervisor,
 - colleague,
 - subordinate.
 - b) presentation of behaviours that comprise discrimination practices; defining whether such reprehensible behaviour consists of:
 - psychological abuse,
 - physical abuse,
 - sexual molesting,
 - economic abuse (e.g. ordering additional tasks without remuneration, forcing to work overtime, ordering tasks which have been assigned to someone else),
 - open discriminatory unequal treatment.
 - c) description of circumstances, including:
 - person(s) against whom the complaint is submitted,
 - time and place of event,
 - relevant circumstances (e.g. training, team meeting, performance review),
 - witnesses of the event or results of the event,
 - any evidence held (e.g. Instructions in writing, notes) which proves improper behaviour.
 - d) defining the frequency of events:
 - Has this happened once?
 - Happened several times.
 - Lasted for several weeks, several months.



- Lasted six months or longer.
- e) description of any additional aspects connected with the subject matter of the complaint,
 - f) if applicable, presentation of any individual mental, health-related or other effects of described events.

§ 3

1. As a result of reviewing the submission, steps shall be undertaken to explain the situation and to ensure protection to reporting employees.
2. Confirmation of circumstances (of mobbing or discrimination) by persons authorized to accept submissions shall result in disciplinary steps being undertaken against persons committing abuse and may constitute the basis of termination of employment.
3. This Policy does not exclude or restrict the entitlement of employees to enforce their rights under relevant laws.



ATTACHMENTS:

- Attachment no. 1 - **Reporting on mobbing**

