



EET Code of Conduct – special focus edition on Offensive behaviour



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1. PURPOSE

- 1.1 The purpose of this document is to lay down the framework for conduct and behaviour at EET with specific focus on culture, offensive behaviour and wellbeing.
- 1.2 Offensive behaviour, including sexual harassment, bullying, violence or violent behaviour, is not tolerated.
- 1.3 Everyone is entitled to be treated with respect, and we must treat each other with consideration, courtesy, and dignity.

2. POLICY STATEMENT

- 2.1 Offensive behaviour will not be tolerated and must be prevented.
- 2.2 At EET we have a shared responsibility for preventing and stopping offensive behaviour, regardless of who the offender is.
- 2.3 All employees should know how to deal with offensive behaviour and what options they have.
- 2.4 The above-described conduct may result in a warning, dismissal, or summary dismissal (see section 6).
- 2.5 Before talking about a colleague internally or externally, you should carefully consider whether to obtain their consent first.
- 2.6 You should be open to the fact that what you consider to be your private and personal sphere may differ from that of your colleague, and you must accept your responsibility for ensuring that you do not invade your colleague's privacy without meaning to do so. Please note that the above also applies to social media, and that you should only share photos etc. from work-related events if consent has been obtained and such sharing is not inappropriate for EET as a workplace.

3. DEFINITION

- 3.1 Under this policy, offensive behaviour is when one or more persons severely subject others to conduct and/or acts which are perceived as degrading or humiliating.
- 3.2 Offensive behaviour is thus an umbrella term for bullying, sexual harassment, violent behaviour, and other offensive acts which may occur at or in connection with work.
- 3.3 Bullying is when one or more persons regularly and over a period of time – or repeatedly and severely – subject others to unwelcome behaviour which is perceived as humiliating or degrading. Examples of such behaviour would be talking about someone behind their back, social exclusion, ridicule, ignoring, etc. However, teasing, which is considered by both parties to be good-natured, or isolated conflicts do not constitute bullying.

3.4 Sexual harassment is when one or more persons subject others to unwelcome conduct of a sexual nature. Examples of such conduct would be unwanted touching, sex-related jokes, sexual advances or display of sexually explicit material.

3.5 Violent behaviour is when one or more persons subject others to physical or mental violence. Examples of such violence would be threats, assault, hostility, spitting or humiliation.

4. GUIDELINES

4.1 As a victim

4.1.1 You are under no obligation to tolerate any kind of degrading, offensive or unprofessional behaviour from managers or colleagues.

4.1.2 If you experience any offensive behaviour, you should speak out as soon as possible. It is important to speak out as offenders will often say that they perceived the situation differently from the victim and that their behaviour was accepted.

4.1.3 If you speak out, the person you speak out against should respect your objection. They should do so even if they believe that the behaviour in question is innocent or just a bit of fun.

4.1.4 Contact your manager (or other, see section 5.2) if the offensive behaviour continues after you have spoken out against it. Please note that you can always contact your manager regardless of whether you have spoken out or not.

4.1.5 Those involved often give different accounts of what happened, so it is important that you do not delete any evidence of the offensive behaviour that you have suffered, including any texts, emails, images, voice messages, etc.

4.1.6 If, in addition to speaking out, you feel that you are able to take up the matter with the alleged offender, such a conversation will sometimes bring the matter to an end – particularly if the alleged offender had another understanding of the situation. However, you are under no obligation to take up the matter with the alleged offender.

4.2 As a colleague

4.2.1 If you witness offensive behaviour, you should not seek to avoid the situation, but instead you should speak out.

4.2.2 You should support the victim. Your support may be crucial to helping the victim cope with what happened.

4.2.3 You may take up the matter with the alleged offender in order to put a stop to the unwelcome behaviour. However, you should only do so if requested by the victim.

4.2.4 If, after speaking out, you see that the offensive behaviour continues, you should contact your manager. Before contacting your manager, however, you must obtain the victim's consent.

4.2.5 Always respect any objections from colleagues to your actions or statements or those of others. Even if you think that they are completely innocent or just a bit of fun or similar.

4.3 As a union or health and safety representative

- 4.3.1 As a union or health and safety representative, you should respond swiftly to any suspected or reported offensive behaviour.
- 4.3.2 The most important thing is to contact and help the victim. Please note that offensive behaviour may be the underlying cause of a colleague's odd behaviour or if the colleague often calls in sick or the like.
- 4.3.3 In some cases, the problem may be resolved with a conversation, particularly if the alleged offender read the situation differently. This very much depends on the severity of the offensive behaviour (the nature of it and the context in which it occurs), and the extent of it (including how long it has been going on) as well as assessment of preventive measures undertaken.
- 4.3.4 In all other cases, such as, for example, unambiguous sexual harassment, violent behaviour, or other serious situations, you should report the matter to management as soon as possible.
- 4.3.5 If necessary, you should also assist management in its effort to find out what happened when and how.

4.4 As a manager

- 4.4.1 As a manager, you should always take any reports of sexual harassment, bullying, violence or other offensive behaviour at or in connection with work very seriously.
- 4.4.2 You should communicate very clearly that offensive behaviour is not acceptable and immediately initiate a procedure to shed light on the matter and/or put a stop to the unwelcome behaviour.

5. PROCEDURE

- 5.1 If you are or have been a victim of or witness to offensive behaviour, you should contact your manager, unless the incident was due to a misunderstanding or a one-off mistake.
- 5.2 If the alleged offender is your manager, you should instead contact the manager's manager, the health and safety representative, or HR. See also other options in our Whistleblower policy.
- 5.3 The health and safety representative, your manager, manager's manager, HR or the chairman of the board of directors will then speak with the person having reported the matter, the victim, any witnesses and the alleged offender in order to shed light on the matter.
- 5.4 If necessary, additional persons may be involved in the process. However, such persons will only be involved with the approval of the parties involved, except where a criminal offence has been committed, which will be dealt with accordingly.

6. SANCTIONS

- 6.1 If it turns out that the offender has indeed engaged in offensive behaviour, management will impose appropriate sanctions on the offender.
- 6.2 Serious cases of offensive behaviour will lead to dismissal or summary dismissal of the offender.



6.3 In less serious cases, a warning or reprimand may be issued.

6.4 If the allegations of offensive behaviour are unfounded, sanctions may be imposed, including dismissal or summary dismissal.

7. CONCLUDING REMARKS

7.1 We expect managers to organise regular team discussions on how to prevent offensive behaviour

8. QUESTIONS

8.1 Please contact your manager or HR if you have any questions about this Code of Conduct on Offensive behaviour.

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Adopted by the EET Group Executive Management November 2023