

**ANTI-HARASSMENT POLICY 2023**  
**DAMPSKIBSSELSKABET NORDEN A/S**

## **Purpose & NORDEN's commitments**

NORDEN is committed to fostering a safe, positive and inclusive working environment for all employees, consultants, contractors and service providers. NORDEN has zero-tolerance towards any kind of harassment including but not limited to abuse, bullying, violence, or discrimination and requires that all employees are treated with equal respect. This is aligned with NORDEN's core values and beliefs, where we see people as our most valuable asset.

## **Policy scope**

This policy covers harassment occurring in the workplace or in other settings in which employees may find themselves in connection with their employment with NORDEN. The policy applies to all persons employed by NORDEN including contractors. The term contractor covers any person who is employed by NORDEN under a service contract, a short-term contract, or a consultancy contract.

## **Definitions**

NORDEN upholds a zero-tolerance policy and proactively fosters a safe workplace where employees are protected from any kinds of harassment, abuse, or threats and where no retaliation is permitted. NORDEN uses the following definitions:

*Zero tolerance:* signifies that any form of harassment, violence, bullying, or discrimination is not permitted. NORDEN's zero tolerance approach means that every single report made, or concern raised, will be taken seriously, investigated and responded to, to find fitting actions and/or consequences. The approach does not imply any specific consequences for the alleged offender but is aimed to provide solutions that reflect the severity of the issue presented. Furthermore, the zero-tolerance approach entails that all employees at NORDEN are held against the same standards, regardless of their position and role.

*Harassment:* any inappropriate, unprofessional and/or unwanted behavior, be it repetitive or occasional, which places somebody in unpleasant and/or unsafe position. Harassment can take place through words, actions, or gestures and can be (but is not limited to) physical, sexual, verbal, psychological, ethnicity or gender based.

*Sexual harassment:* any unwanted actions, words or gestures of a sexual nature that instigate, or aim to instigate any sexual advances or request for sexual favors. Sexual harassment is any inappropriate behavior of a sexual nature which can cause offense, humiliation, pain, distress, vulnerability, and ultimately creates an uncomfortable and unsafe working environment. Sexual harassment can be single event or repeated, can be verbal or physical and targeted towards any gender.

*Bullying:* any repeated targeted, deliberate, and hurtful behaviour which occurs against a person, leaving them in an uncomfortable, vulnerable and difficult situation, often without the means to defend themselves. Bullying can be verbal or non-verbal, online or offline, and can lead to (but is not limited to) humiliation, emotional distress and/or exclusion.

*Violence:* any intended and calculated use of physical force or power, or threats thereof. Violence holds a destructive and hurtful nature and aims to cause harm, pain, injury, destruction, or death to another. Like harassment or bullying, violence can be targeted at a single person or a group of people.

*Discrimination:* any unjustified and unfair treatment of, or behaviour towards someone, based on ethnicity, nationality, sexual identify and/or orientation, age, disability, religion, political opinions, social origin, economic status or other. Discrimination can be the result of actions and decisions but can also be

manifested by choice of words and attitudes, such as abuse of power towards someone or a group of people.

### **Prevention**

NORDEN recognises that the demarcation between harassment and work-related conflicts can sometimes be blurry and that conflicts are a known precursor to harassment. It is therefore our managers responsibility to ensure that any work-related tensions in their team do not escalate nor lead to inappropriate and unprofessional behaviour. E.g., by establishing clear communication and feedback on sensitive topics and taking appropriate managerial decisions.

All employees are held accountable through NORDEN's Employee Code of Conduct, DE&I policy, Human Rights Policy and Anti-Harassment policy. Employees are therefore expected to actively contribute to an inclusive work environment by treating all colleagues with equal respect, dignity and consideration of personal boundaries.

### **Reporting process**

NORDEN is determined to create a working environment where everyone feels safe and empowered to raise concerns and report incidents and where employees, their positions, their reputation and their working relationships will be protected. Furthermore, NORDEN aims to foster a culture where everyone is empowered to engage in conversations about harassment and personal boundaries. NORDEN encourages colleagues to speak up and step in if they see or hear about harassment, bullying, violence or discrimination.

If an employee wishes to report a concern or an incident, they can choose one of the five reporting channels:

- Contact your Immediate Manager
- Contact your Head of Department
- Contact a HR Business Partner or Head of People
- Contact our CEO
- Use our Whistleblower portal. This option is anonymous.

The annual harassment survey is also an anonymous tool that allows NORDEN to measure and monitor effectiveness of the reporting systems. NORDEN encourages all employees to fill out the survey and voice their experiences in NORDEN and opinions regarding NORDEN's way of addressing harassment.

All reports will be handled confidentially, in a timely manner and will be taken seriously. All parties involved will be treated in an objective and fair manner. By reporting through one of our five channels, the reporter consents to the necessary investigations and follow-up of the presented allegations. All reports of harassment of any kind will be taken seriously and treated with respect and in confidence, where no more people than necessary will be involved. There is no standardised process and each situation will be dealt with on a case-by-case basis.

More information on the Whistleblower scheme is available on NORDEN's [whistleblower website portal](#). For more information regarding anti-harassment at NORDEN, employees are encouraged to visit the intranet where additional information is available.

### **In case of policy breaches**

If after investigation, a breach in policy has been identified, appropriate actions and consequences will be taken. Anonymity will remain if the reporter wishes so and support will be provided where needed. The

corrective measures, which can vary and will be agreed upon by the report receivers, can include verbal or written warnings, trainings, demotions and contract terminations.

## **References**

NORDEN's key relevant policies related to anti-harassment, violence, bullying and discrimination include:

- The Diversity, Equity & Inclusion policy
- The Health & Safety policy
- The Human Rights policy
- The Employee Code of Conduct
- The Supplier Code of Conduct
- The Technical Manager Code of Conduct

These policies can be found in NORDEN's internal intranet, or on NORDEN's website.

## **Review and revision**

*This policy is subject to review every two years to ensure effectiveness and compliance with NORDEN's strategy, and in the case of significant changes, the policy will be presented to Head of People for approval. Latest Review: October 2023.*