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Policy against Abusive Discrimination and Sexual Harassment

Policy and action plan for abusive discrimination and sexual harassment



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Contents and Aim

In the equality plan there are guidelines concerning employees' equal value in which it shows that the company does not accept any form of harassment or other abusive treatment of employees at the workplace.

Every employee has a responsibility to contribute to creating a good working environment and to counteract abusive discrimination. Among other things, acting when you see or suspect that another employee is exposed to abusive treatment or discrimination in any form.

Related documents

- *Policy against Abusive Treatment and Sexual Harassment* (insert link)
- *Whistleblowing* https://tele2.sharepoint.com/Global/Documents/Whistleblowing_Policy_2019.pdf
- *Code of Conduct*
<https://tele2.sharepoint.com/Global/Documents/Tele2%20Code%20of%20Conduct%20Nov%202018%20-%20Swedish.pdf>
- *Diversity and Inclusion Policy*
<https://tele2.sharepoint.com/sweden/Documents/Tele2%20Diversity%20and%20Inclusion%20Policy%202019.pdf>

Introduction

All employees at Tele2 have the right to be treated with respect.

Abusive treatment is a work environment issue where the victim has interpretative priority in deciding whether or not they have been victimised. According to the law (2005:476 section 6, section, 22a), Tele2 is obliged to investigate the circumstances surrounding the alleged harassment and take any measures that may be required to prevent harassment in the future. In the event of abusive treatment, prompt and effective measures are required, which must be taken with good judgement and with regard to the integrity of the individual.

Goal

All employees at Tele2 must know about the company's attitude to, and what is meant by, sexual harassment and harassment on the basis of gender as well as the action plan for abusive treatment and other harassment.

What is abusive treatment?

- By abusive treatment is meant recurring or negative acts directed at a specific employee in an abusive manner and which may result in these persons being placed outside the community of the workplace. It is commonly called bullying and harassment in everyday speech and applies to both verbal and written/pictorial expressions. Examples of abusive treatment:
- Contempt of individual employee or his family
- Mocking, neglecting or deliberate freezing out of employee
- Threats and humiliation, such as sexual harassment, deliberate insults or over-critical treatment.
- Deliberately making it difficult for an employee to perform his/her work (e.g. withholding or giving incorrect information)
- Temporary disagreements, conflicts or cooperation problems should be seen as normally occurring phenomena and not as offensive treatment unless they are intended to deliberately harm or offend any person. Unlike a common conflict, which occurs in all workplaces, violations and harassment are recurring.

Definitions

Abuse/harassment

A behaviour that violates someone's dignity and is related to one of the grounds of discrimination, gender, gender identity or expression, ethnic affiliation, religion, disability, sexual orientation or age. Also applies to marital status, union membership, political affiliation or national origin.

Sexual harassment

A behaviour of sexual nature that violates someone's dignity in a way that the individual himself/herself perceives as abusive. For example, derogatory jokes about sexual orientation or the gender of the person, unwelcome gestures, touches, looks, or words of sexual intimacy.

What do we do to prevent abusive discrimination?

HR

Communicate knowledge in the company through information and formulate policies and guidelines on abusive treatment and sexual harassment. Information can be found both in Tele2's Work Environment and Gender Equality policies and in the IT Policy and Code of Conduct. The latter is a document that all employees must read, understand and sign and which clearly sets out the company's values and guidelines as well as the employee's responsibilities and obligations. In the IT policy, Tele2 distances itself from gender-discriminating images in the workplace. Tele2 has a Whistle Blower policy that provides information on how employees can report irregularities that are not in line with company policies or values.

Managers:

- Give all new employees an introduction so they quickly enter the work community
- Hold regular group meetings and performance management discussions where issues regarding well-being, treatment and work climate are addressed
- Continuously identify and address deficiencies in the psychosocial work environment according to delegation of work environment responsibility.
- Pay attention to early signals and address conflicts
- Provide support to those affected

Employees:

- Show respect and accept each other's differences
- Dare to respond to freezing out and bullying
- Provide support to those affected

Action plan for harassment

It is always the immediate manager who has the main responsibility for preventing, investigating, stopping and follow up abuse and harassment. Every suspected case of abusive treatment must be taken most seriously and the work is always done in consultation with HR.

How we act with regards to investigation and handling of abusive treatment and sexual harassment

At Tele2 we treat everyone with respect and dignity and we have zero tolerance against bullying and all types of harassment. We must have a workplace completely free from sexual harassment and abusive treatment.

All managers and employees are responsible for taking immediate action when they become witnesses or receive information on suspicion of abusive treatment or sexual harassment. All employees have a responsibility to speak up about or highlight behaviours that are perceived as offensive by either directly contacting the person concerned or immediately informing their immediate manager, their manager's manager or HR.

Investigation

In the event of suspicion that abusive treatment or harassment has occurred, HR should always be involved. In the event of suspicion of more serious offending or harassment, Security shall conduct an independent investigation. Other events are investigated by the HR Advisory team.

The following steps should always be followed:

1. Investigate
2. Stop
3. Follow-up
4. Prevent

Information

Cases of abuse and sexual harassment are always treated **confidentially**. In the event of an investigation of a more serious nature, the following (and only) roles should be informed;

1. Head of Security
2. CEO, EVP P&C and Group General Counsel
3. Head of Business unit
4. Negotiation Manager

5. First line manager (if the manager himself/herself is impartial)

In the event of investigations, the following (and only) roles should be informed;

1. Head of Security (incident reporting)
2. Negotiation Manager
3. Head of Business unit
4. Head of Business Advisory (investigation can be delegated)
5. First line manager (if the manager himself/herself is impartial)

Communication

Tele2 strives to communicate our values and we act with openness if possible. This must always be balanced with the protection that may be needed for individuals involved.

Different responsibilities

The manager's actions in the event of abusive treatment

- Do not hesitate in addressing the problem immediately. Contact HR for assistance in objectively managing and investigating the situation.
- Listen and talk to the person affected and also the other person concerned. If the victim so wishes, the occupational health and safety representative or HR-Business Advisor may be invited to attend the meeting.
- Try to create an open and honest atmosphere with an objective approach and with a positive problem-solving attitude. Tell everyone involved about their obligation to contribute to creating a good working environment.
- Clarify that the matter will be dealt with in a discreet manner and that no action will be taken without the approval of the victim.
- Always document the course of events and actions taken.
- Provide support to the victim and, if necessary, offer additional support contact via the health service, Hälsoslussen.
- In the event of serious abuse or harassment, disciplinary action should be taken against the person who committed the offence (see information below). All forms of disciplinary action are handled by the responsible manager together with HR Business Advisor in accordance with applicable labour law and agreements. If the abuse or harassment is suspected to be of a criminal nature, you as a manager should support the employee in reporting the matter to the police.

Employees

- The person who is subjected to abusive treatment or discrimination or who suspects that others are exposed:
- Speak up straightaway! Either verbally or by letter if it is stressful to confront the person (s) in question.
- Document – what has happened, when and how.
- Turn to your manager for help, support and guidance. If you feel that your immediate manager is part of the problem or if you do not receive sufficient help, you can contact your HR Business Advisor, Work Environment Ombudsman or Senior Manager.
- You can also contact the health service, Hälsoslussen for support and guidance.
- If you believe that none of the above-mentioned bodies help, there is also a Whistle Blower Policy, an independent party that you can contact in case of irregularities that are not in line with the company's policies and values.

The person who victimises others

In the event of abuse that leads to disciplinary action, HR Business Advisor and the responsible manager must act in accordance with applicable labour law and agreements. Disciplinary measures may be relevant depending on the nature and extent of the abuse. Examples of disciplinary measures are warnings both orally and in writing, relocation and, in rare cases, repeated behaviour, notice of termination due to personal reasons or immediate dismissal (for example, violence or threat of violence). In case of a criminal nature, the police should be notified.

References: The Swedish Work Environment Authority AFS 1993: 17, the Discrimination Act