

Atea ASA

Anti-discrimination & harassment policy

Our mission is to be **The Place to Be** for our employees, customers and partners. Therefore, well-being is high on the agenda and Atea is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, harassment, and bullying. Therefore, Atea expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice, and harassment.

Our Anti-discrimination & harassment principles

Atea employees are to be committed to fair and respectful treatment of all colleagues or other business associates according to our values. Employees will base employee-related decisions solely on relevant qualifications such as personal suitability, education, experience, results, and other professional criteria.

Discrimination & harassment

Discrimination is the unfair and/or dis-favourable treatment of a person, based on protected grounds/characteristics. The grounds of discrimination/protected characteristics and the level to which discrimination laws protect varies from country to country. Examples include sex, gender, pregnancy, parental leave, transgender identity or expression, religion, national or ethnic origin, cultural background, social affiliation, disability, sexual orientation, marital status, age, or political conviction.

Discrimination is connected to individuals and the prohibition of discrimination applies in the work life and in recruitment processes.

The different types of discrimination can include direct discrimination, indirect discrimination, inadequate accessibility, harassment, sexual harassment, and instructions to discriminate. Again, the legal definitions and protection levels vary between our operating countries.

Harassment is conduct/behaviour (verbal, non-verbal, visual) that violates a person's dignity. When such conduct is further

connected to one of the protected grounds the harassment is classified as a form of discrimination. When harassment is of a sexual nature this becomes classified as sexual harassment.

Harassment of any form, discriminatory or other, will not be tolerated at Atea.

Examples of Discrimination

Discrimination is when a person is treated dis-favourable based on the grounds in the Discrimination Act.

Examples of discrimination can be:

- An employee has a lower salary for the same or equivalent work, and it is correlated to gender.
- An employer perceives that a job seeker has a foreign-sounding name and therefore does not call him for an interview
- A trial employment is terminated when the employer learns that the employee is pregnant.
- A person is not considered for a course due to their age.

Examples of harassments

Harassment can occur at the office or on free time by e-mail, phone, text and voice messages, social networking sites or other means. It is the person exposed to harassment who decides what is unwanted or offensive. For example:

- **Verbal:** Slander, intrigue, spreading rumours, slurs or negative stereotyping labelling, hurtful or undignified treatment, mockery, aggressiveness, and negatively charged or hurtful remarks or jokes.
- **Non-verbal:** Unwelcome physical contact, deliberate excluding body language, deliberate withholding of information, and leering or inappropriate staring,
- **Visual:** Unwanted or undignified pictures on display or by personal messages, Examples of sexual harassments

The examples are not exhaustive.

Responsibility

The policy applies to all managers and employees at Atea.

Conduct prohibited by this policy is unacceptable in all situations related to work. For example, at conferences, working trips, social events, at work (both at the office, customers office and from home) phone, email, and costumer contact.

If support is needed to interpret the content of this policy, contact immediate manager or HR department.

Complaints

Atea encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Atea to investigate such reports promptly and thoroughly. Atea prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

Atea encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

- Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should contact their immediate manager or HR department. Management has a duty to take complaints received seriously and act promptly and incidents should be reported to the HR department.
- Atea will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.
- Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counselling or disciplinary action such as a warning or being met with other employment law consequences.
- In exceptional cases, the whistleblowing service can be used to report concerns if the case hasn't been handled properly by management. Read our whistleblowing policy carefully beforehand.

Holding

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