

ANTI-DISCRIMINATION POLICY

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1 Protection of personal integrity

Sunrise protects the personality rights of all staff. They are entitled to have their mental and physical integrity protected at the workplace.

Mobbing, sexual harassment or any other forms of discrimination (e.g. violence, gender) represent an infringement of the personality rights of the persons concerned. They affect the victims personal development, self-esteem, freedom of action and freedom of decision, offend their dignity and possibly their social reputation as well. Therefore any form of mobbing, sexual harassment or discrimination is not tolerated by Sunrise and its management.

Sunrise requires that all staff respect the personal limits that their colleagues have set in their interpersonal relationships.

2 Policy statement

Sunrise does not allow any form of mobbing, any form of sexual harassment or any form of discrimination at the workplace and undertakes suitable measures to protect its staff against such behavior.

Any form of mobbing, any form of sexual harassment and any form of discrimination is prohibited whether it takes place within Sunrise premises or outside, including but not limited to social events, business trips or training sessions sponsored by Sunrise.

In the event of any such incidents Sunrise will consult the persons concerned to decide on how to proceed.

Any individuals guilty of such discrimination can expect sanctions. All complaints of mobbing, sexual harassment and discrimination will be taken seriously and treated with respect. Individuals seeking advice or filing a complaint and any other persons involved (except the perpetrator) may not suffer any disadvantages or retaliation.

3 Definition of *mobbing*

Mobbing is understood as negative communicative acts by one or several individuals directed against a certain person and repeated over an extended period of time. Mobbing is therefore a form of destructive behavior at the workplace. It can be contrasted with conflicts at the workplace that are settled fairly.

Mobbing can be expressed in various acts that injure an individual's personality rights and self-esteem. Examples of conduct or behavior which constitute mobbing include, but are not limited to:

- An aggressive or attacking form of communication (permanent criticism, threats, refusal to make contact, constant interruption etc.)
- Attacks on someone's social reputation (spreading rumors, exposure to ridicule, allocation of humiliating tasks etc.)
- Attacks on a person's professional integrity (withholding assignments, mental overload or underload etc.)
- Assaults on someone's health (forcing someone to carry out work that is harmful to health, threatening or engaging in physical violence etc.)

4 Definition of *sexual harassment*

Sexual harassment is any act with a sexual connotation that is not desired by the victim. It can take many different forms. Anyone can be victim of sexual harassment, regardless of their sex and of the sex of the harasser. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

- Sexually suggestive and embarrassing remarks;
- Sexist comments and jokes;
- Showing, hanging up or displaying pornographic material;
- Downloading and disseminating pornographic images and texts from the internet;
- Undesired physical contact;
- Obtrusive advances;
- Advances while promising advantages or threatening disadvantages;
- Pestering someone on and outside the Sunrise premises;
- Sexual and physical assaults.

5 Prevention

All members of staff are under an obligation to behave in such a way that they help create an atmosphere that is free of mobbing, sexual harassment and discrimination.

Staff who feel that they are being mobbed, sexually harassed or discriminated should make this clear in no uncertain terms to the person concerned.

Superiors are responsible for creating a working atmosphere that is free of mobbing, sexual harassment and discrimination in their area of responsibility. They must ensure that any signs of mobbing, sexual harassment or discrimination are dealt with immediately.

Anyone who notices others being mobbed, sexually harassed or discriminated is expected to take a direct stand, to offer the victims their support and to criticize the person responsible for the mobbing, the sexual harassment or the discrimination. In particular, they should call the attention of the victim to the services of the support and counseling bodies.

6 Support and counseling body

The support and counseling bodies mentioned below are available to provide information and answer questions and also to offer support and advice to the victims. Individuals who are unsure whether they themselves are guilty of sexual harassment, mobbing or discrimination and wish to clarify their position can contact the responsible HR manager, the staff committee or the compliance officer (directly or through Sunrise whistleblowing portal).

Their tasks particularly include:

- Listening to the victims,
- Providing them with support and advice,
- Carrying out informal measures to put an end to the sexual harassment, the mobbing or discrimination, in cooperation with the persons concerned and only on their request,

- Providing information regarding avenues for complaint, the remedies available under criminal and civil law, the preconditions and the possible consequences.

These bodies are subject to absolute discretion and may take no further steps without the consent of the person concerned.

Anyone who notices others being mobbed or sexually harassed or discriminated can also contact the responsible HR manager, the staff committee or the compliance officer (directly or through Sunrise whistleblowing portal) to report such occurrences.

7 Complaints Procedure

The person concerned has the right to submit a written complaint to the Chief Human Resources Officer (CHRO) and request an investigation, with or without first consulting the support and counseling bodies. The CHRO convenes the Complaints Commission (Commission) consisting of a representative from the HR department, the legal or compliance department, the Top or Senior Management and the Staff Committee. In case of conflict of interest or for other objective reasons the CHRO may change the formation of the Commission in a particular case.

The Commission selects a member to chair the presiding body. The Commission can appoint a member to investigate the matter and report back to the Commission on the results of the investigation. The Commission can also decide to mandate an independent third party (e.g. attorney at law or mediator) to carry out the investigation. The Commission then informs the CEO of the results of the investigation and, if need be, makes recommendations on a solution to the conflict or the measures to be taken.

CEO and relevant ELT member will then decide on the further procedure and any sanctions. They will notify the persons concerned of the decision in a suitable way after consulting the Complaints Commission.

8 Sanctions

Depending on the gravity of the incident, the sanctions range from a written reprimand to summary dismissal. Management expressly reserves the right to impose sanctions against anyone guilty of inappropriate conduct, even if the incident should be settled by amicable agreement. There may also be legal consequences under both criminal and civil law.

9 False accusations

If anyone makes an accusation of mobbing, sexual harassment or discrimination against their better knowledge, they can expect the same sanctions mentioned above.

10 Current names and addresses

The current names and addresses of those responsible (Chief Human Resources Officer, the staff committee, the responsible HR manager, compliance officer) can be found in "go!" (intranet).

11 Effective date and power to make amendments

The present policy replaces the policy of September 1, 2018 and comes into force on October 1, 2018. It applies until further notice and may be amended by the Executive Leadership Team at any time.