



We cultivate a respectful  
work environment

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# Respect in the Workplace Group Policy

A Policy Against Harassment  
and any form of Violence

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## Purpose

TITAN Group is committed to respecting, protecting, and advancing human rights, in full alignment with international norms and standards in all Group activities, operations and workplaces.

To that end, we aim to provide and maintain a respectful work environment, that is free from acts or threats of violence and harassment at work, thus ensuring the physical and mental safety, self-esteem, appreciation and wellbeing of all employees and persons in the workplace.

The Respect in the Workplace Group Policy (hereafter the “Policy”), supplementing Human Rights and Diversity, Equity & Inclusion Group Policies, aims to:

- Promote a culture of dignity, fairness, and respect, and enhance employees’ wellbeing in the workplace.
- Express TITAN Group’s strong commitment and zero tolerance against any form of violence and harassment at work.
- Provide the principles and standards for properly recognizing, addressing, and combatting any form of violence and harassment during, linked with, or arising out of work.

## Scope and Application

This Policy applies to all individuals working in TITAN Group, regardless of their position, level and grade, irrespectively of their employment or contractual status, including persons employed by suppliers, contractors, consultants or third service providers, as well as jobseekers, volunteers, interns, apprentices, and individuals exercising the authority, duties and responsibilities of an employer (collectively “employees”). This Policy applies also to any other person being present at a TITAN Group workplace, including but not limited to customers, visitors and stakeholders.

The Policy covers any violence and harassment incident that occurs anytime and anywhere in all workplaces and circumstances related to work, including:

- a. the workplace, including public and private spaces which are a place of work;
- b. places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities;
- c. during work-related trips, travel, training, events or social activities;
- d. work-related communications, including those enabled by information and communication technologies;
- e. in employer-provided accommodation; and
- f. when commuting to and from work.

In some countries, local laws and regulations may be more stringent than the principles set out herein. Where this is the case, the more stringent rules apply.

## Statement of Zero Tolerance

We take a stand against any action that compromises the culture of respect, dignity, and mental safety in the workplace. To that end we express zero tolerance against any actual or threatened form of violence and harassment at work and we will not tolerate any form of attacking, intimidating, humiliating, or sabotaging in our workplace committed by or against employees and any person at the workplace.

We respect and comply with international regulations and standards related to the fundamental human right for a safe and healthy working environment, in line with the ILO Declaration on Fundamental Principles and Rights at Work and the ILO Convention 190 on Violence and Harassment.

Any type of violence and harassment at work is, for TITAN Group, unacceptable, constitutes a critical human rights violation which, among other negative impacts, threatens the physical and mental health, as well as the wellbeing of our people.

Any negative incident identified will be properly addressed, as specified by this Policy, and necessary steps and remediating activities will be activated.

## Definitions

**"Violence and Harassment"** refers to unacceptable behaviors and practices or threats thereof, whether of a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm of the victim. The definition covers all forms of violence and harassment at work.

**"Discrimination-based violence and harassment"** is any action or behavior directed at persons because of their particular personal attributes, such as sex/gender, race, color, ethnic or social origin, genetic characteristics, language, religion or belief, political opinions, disability or state of health, sexual orientation, age or health status (for example: HIV, pregnancy).

**"Gender-based harassment"** means any form of conduct related to a person's gender that has the purpose or effect of violating human dignity and creating an intimidating, hostile, degrading, humiliating, or aggressive environment.

## Principles and Standards

### What Constitutes Violence and Harassment at Work

Violence and harassment cover a broad range of unacceptable, offending, and unwelcomed actions and behaviors, creating an intimidating, hostile, degrading, humiliating or aggressive environment, which:

- may be physical, psychological, or sexual.
- may be expressed verbally, written or online (through communication technologies such as SMS, e-mail, social media, letter, telephone) or by spreading malicious comments or insults.
- may range from clear cases of disrespect to serious acts of physical, psychological, or sexual assault.
- may occur among colleagues, superiors and subordinates or persons at the workplace.

### Common examples of Violence and Harassment at Work behaviors

**Physical violence and harassment:** assault, such as pushing, grabbing, slapping, biting, scratching, hitting, kicking, throwing an object etc.

**Psychological violence and harassment:**

- bullying or mobbing behavior such as yelling, humiliating, threatening, excluding, insulting, using hurtful remarks, offensive language, or any form of verbal abuse.
- outbursts of anger against a person or a group by misuse of authority and power.
- making fun of co-workers, including family, sexuality, gender identity, race or culture, religion, local cultural or behavioral habits and traditions, education, or economic background.
- making mocking or offensive comments about a person's clothing, including head covering.
- comments on appearance or character that may cause embarrassment or shame.
- making derogatory comments or taunts about a person's disability, or practicing harassing performance monitoring, over-attribution of mistakes based on negative stereotypes about the competency and productivity of the person with disability.
- giving unattainable goals and deadlines or pointless tasks, irrelevant to the job description.

**Sexual violence and harassment:**

- sexual assault, rape, indecent exposure, stalking or obscene communication; unwelcome physical contact including, pinching, tickling, stroking, kissing, hugging, cornering, or inappropriate touching.
- asking intrusive questions about an employee's private life or body.
- making insulting comments or jokes about gender identity or sexual orientation.
- repeatedly asking for dates despite being rebuffed.
- sexual advances or favors using the threat (direct/indirect) that any refusal will affect career development or recruitment.
- sharing or displaying sexually explicit pictures, videos, screen savers or posters; sending sexually explicit email or text messages or circulating offensive or obscene material (hard copy or electronic).



## What does not constitute Violence and Harassment at Work

Some behaviors during the performance of ordinary business activities, although sometimes may involve unpleasant feelings and consequences, are not considered as violence and harassment at work if these are carried out objectively and constitute reasonable managerial actions. Examples are:

- Legitimate Supervision: Day-to-day management decisions, legitimate comments, and managerial advice, changing work assignments and duties according to business needs.
- Constructive Feedback: Informing a worker about unsatisfactory work performance, following a fair and documented process, possibly resulting in not selecting a worker for promotion.
- Social interactions: Courteous, mutually respectful, consensual, noncoercive physical or mental interactions, in conformity with local communication, greeting or conduct standards and customs.
- Work related interactions: Incidents and situations which include physical contact necessary for the performance of the work, using accepted industry standards.
- Differences of Opinion: Disagreements at work that are not based on race, gender, age, ethnicity, religion, sexuality, personal characteristics, or any other discriminative factor.
- Misunderstandings, possibly due to cultural differences, may not necessarily constitute violence and harassment.

It is important to note that the intent and the context play a significant role in determining whether a behavior qualifies as violence and harassment.

Anyone seeking information, or in case of doubt, must consult his/her Manager, Group/Local HR, Legal or Compliance Department.

## Impact of Violence and Harassment at Work

Violence and harassment at work can have a profound negative impact on the safety and the physical and mental wellbeing of victims, causing emotional and psychological trauma, depression, fear, anxiety and a loss of dignity, respect, and self-esteem.

Violence and harassment at work disrupts workplace relationships and conditions, impairs trust, creates operational inefficiencies through lack of motivation, poor employee engagement, increased absenteeism and employee turnover, reduced productivity, favors discriminative practices, and promotes injustice and inefficient career advancements.

It can tarnish a company's reputation, make it less attractive to potential employees and customers and may result in legal consequences, including lawsuits and financial penalties.

## Rights and responsibilities

### Rights and responsibilities of all employees and persons present at the workplace

All employees and persons present at the workplace:

- Are entitled to work free from any form of violence and harassment at work and deserve to be treated with dignity, courtesy, and respect, regardless of their gender, race, religion, or any other protected characteristic.
- Have the right to remove themselves from a situation they have reasonable justification to believe that presents an imminent and serious danger to life, health or safety due to violence and harassment, without suffering retaliation or other undue consequences.
- Have the right to access secure reporting mechanisms, set forth by the Group Whistleblowing Policy, for reporting any incident related to violence and harassment at work, with confidentiality and without fear of retaliation. It is expected and strongly encouraged to report any incident or witnessing of violence and harassment and to cooperate with the established investigative procedures.
- Are responsible, irrespective of location, level, and employment status, to treat everyone at the workplace with respect and professionalism, refraining from committing, engaging, or facilitating any form of violence and harassment at work.

It is strongly recommended, when visiting a foreign country or a different region, to be aware of the main local communication, greeting, conduct, nutritional, religious, or secular dressing standards and norms, in order to avoid any interaction or behavior that might be perceived as inappropriate or offensive in general.

- Must stay informed about the TITAN Group’s policies and procedures related to violence and harassment at work, and actively participate in training awareness programs provided by TITAN Group to prevent violence and harassment.

## Responsibilities of supervisors and management

- To implement the established reasonable and effective measures and programs to minimize the violence and harassment at work risk in the workplace under their supervision.
- To timely detect and report any obvious behavior that might result in a potential violence and harassment at work incident or threat.
- To respond timely and effectively to employees’ concerns, provide information and support where needed, promote openness, and encourage them to report any relevant concern or incident responsibly and accordingly.

## Responsibilities of the Company

TITAN Group will take any reasonable steps and measures to ensure that employees do not participate and are not subject to a violence and harassment at work risk, by creating and maintaining a workplace that is safe, respectful, and free from violence and harassment incidents. This non-negotiable commitment to combat any form of violence and harassment within TITAN Group is reinforced through the following:

- **Awareness and Training:** TITAN Group provides customized awareness and training programs on violence and harassment at work and business ethics, aiming to keep employees adequately informed for their rights and responsibilities and the ways of recognizing, avoiding and responding to violence and harassment at work incidents and threats.  
Relevant information will be provided to contractors and external collaborators, to be aware of the Group standards, expectations, and requirements on the subject, as needed.
- **Risk assessment and response:** Periodic risk assessments will be performed, aiming to evaluate violence and harassment at work risk factors, to identify vulnerabilities and situations in which a violence and harassment at work incident may eventuate, for remediation measures to be taken.
- **Support for victims:** Consultation and support will be offered, with full discretion, to employees and persons exposed to or being impacted by a violence and harassment at work incident, including access to counseling and legal assistance, to minimize negative impacts and ensure their safety and well-being.

## Reporting and Investigation

TITAN Group is committed to maintaining multiple, confidential, secure, and easily accessible reporting channels and mechanisms, in order to facilitate the receipt of reports of violence and harassment at work incidents. All reported incidents will be promptly, impartially, and confidentially investigated.

The **HR Department** is primarily responsible for handling all reported violence and harassment at work incidents and to coordinate investigation and deterrence activities, in cooperation with management, following the principles and standards set forth by the Group Whistleblowing Policy and local laws.

**We strongly encourage** any person within the scope of this Policy, in case of experiencing or witnessing any incident of violence and harassment at work, to report it immediately to the **HR Department**. Alternatively, incidents can be reported to any member of **Line / Senior Management**, in good faith, providing all necessary information to facilitate the proper investigation of the incident.

Violence and harassment at work incidents may also be reported through the TITAN Group’s web and phone-based reporting system, **EthicsPoint**, hosted by an independent external service provider, to ensure the confidential collection of all reports. In EthicsPoint, a report may be submitted 24 hours a day, 7 days a week, either anonymously or signed, via telephone or the Internet, in either English or local language. The submission of reports in bad faith is considered as an abuse of this policy and will be treated as a violation. Further details and guidance for submitting a report are provided in the **Group Whistleblowing Policy**.

Reasonable proactive measures will be taken, including adjustment of working conditions, to prohibit retaliation or discrimination against individuals who report violence and harassment at work incidents.

## Violations and Consequences

Breaches of this Policy and engagement in the conduct or behavior of violence and harassment at work will not be tolerated. Depending on the nature and seriousness of the violation, and according to the applicable laws, disciplinary and/or legal action may be taken against any person who is found to be in violation of this Policy.

Disciplinary actions may include verbal or written warning, suspension, termination of collaboration or contracts, reasonable adjustments of working conditions or dismissal.

In cases of severe violations or actions that violate applicable laws and regulations, perpetrators may be subject to prosecution under civil or criminal laws.

## Policy Administration

Group HR and Group Compliance & Anti-Fraud Departments are jointly responsible for the administration and periodical review and update of this Policy.

Revisions will be submitted for approval to the Group Executive Committee.