Document name	Policy against victimisation, harassment, and sexual harassment
Policy holder	Jenny Garneij, EVP People & Change
Other interest holders	Security, Sustainability, Communications
Policy last revised (date)	June 2024
Version	3.0
Policy approved by (name / date)	Executive Leadership Team
Policy valid as of	June 2024
Policy valid until	Until Further Notice

Policy against victimisation, harassment, and sexual harassment



Table of Contents

Introduction	3
Goals	3
Definitions	3
Preventive work	4
Action plan when it has happened	5

Introduction

All employees at Tele2 have the right to be treated with respect. Tele2's Work Environment and Equality Policies provide guidelines on the equal value of employees, stating that the company does not accept any form of harassment or discriminatory treatment of employees in the workplace. The IT policy states that Tele2 does not tolerate gender-discriminatory images in the workplace.

Tele2's Code of Conduct is a document that all employees must read, understand and sign, and where the company's values and guidelines are clearly stated, as well as the employee's responsibilities and obligations. Tele2 also has a Whistleblowing Policy that provides information on how employees can report incidents that are not in line with the company's policies or values.

Click here to go to the collection page for policies and guidelines within Tele2.

Every employee has a responsibility to contribute to creating a good work environment and to prevent victimisation or harassment. This means, among other things, to act when you see or suspect that other employees are exposed to this.

Goals

All employees at Tele2 should be aware of the company's position on and what is meant by victimisation harassment, and sexual harassment, as well as the action plan for alleged exposure.

Definitions

Victimisation¹

Actions in an abusive manner at one or more employees and that may lead to ill health or to exclusion from the workplace community. It is commonly called bullying in everyday speech and applies to both verbal and written/pictorial expressions.

Examples of victimisation:

- Contempt of individual employee or his family
- Threats and humiliation, 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 victimisation unless they are intended to deliberately harm or offend any person. Unlike a common conflict, which occurs in all workplaces, victimisation is usually recurring.

Harassment²

A conduct that violates a person's dignity and that is associated with one of the grounds of discrimination: sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.

Information Classification: Internal

¹ According to 4 § AFS 2015:4 Organisatorisk och social arbetsmiljö (OSA)

²According to 1 kap. 4 § 4 p. <u>Diskrimineringslagen</u> (DiskL)

Sexual harassment³

A conduct of sexual nature that violates someone's dignity.

The affected individual should him- or herself perceive the behavior as offensive. For example, it can be about derogatory jokes about sexual orientation or the gender of the person, unwelcome gestures, touches, looks, or words of sexual intimacy.

Unlike harassment, no connection to any of the grounds of discrimination is required here.

Preventive work

What do we do to prevent victimisation, harassment, and sexual harassment?

Leaders:

- Give all new employees an introduction so they quickly enter the work community
- Conduct regular group meetings and performance management discussions where issues regarding well-being, treatment and work climate are addressed
- Hold regular check-in:s with employees
- 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
- Take the annual education in Tele2:s Code of Conduct

HR:

• Communicate knowledge in the company through information (including through this policy) and train leaders

Support managers in their work on psychosocial work environment issues

Employees:

- Show respect and accept each other's differences
- Dare to respond to freezing out or bullying
- Provide support to those affected
- Know and understand the content of this policy
- Take the annual educations in Tele2:s Code of Conduct

.

³ According to 1 kap. 4 § 5 p. DiskL

It is always the immediate manager who has the main responsibility for preventing, investigating, stopping and following up alleged victimisation, harassment, and sexual harassment. Every suspected case must be taken most seriously, and the work is always done in consultation with HR.

Action plan when it has happened

Leaders' actions at a situation of victimisation

- Do not wait but take action immediately. Contact HR for help to objectively handle and investigate the situation.
- Listen and talk to the affected person and also others involved. If the victim so wishes, the work environment representative, union representative or HR Business Advisor should be offered to attend the conversation.
- Try to create an open and honest atmosphere with an objective approach, and a positive problem-solving attitude. Point out to everyone involved their obligation to contribute to creating a good work climate.
- Clarify that the matter will be treated confidentially and that no actions will be initiated without the approval of the victim.
- Always document the course of events and actions taken
- Support the victim and offer additional support contact via Hälsoslussen if needed.

When it comes to both victimisation, harassment or sexual harassment, these are work environment issues where the victim him- or herself has interpretive precedence in determining whether he or she has been exposed or not. When Tele2 becomes aware that an employee considers himself to have been subjected to victimisation or any kind of harassment in connection with work, Tele2 is legally obliged to investigate the circumstances surrounding this and take any measures that may be required to prevent harassment in the future⁴. This often requires quick and effective actions that must be taken with good judgment and respect for the integrity of the individuals.

For serious offenses, disciplinary action should be taken against the person who committed the violation (see information below). All forms of disciplinary action are handled by the responsible manager together with HR Business Advisor in accordance with applicable laws and agreements. If the victimisation or harassment is suspected to be of a criminal nature, you as a manager should support the affected employee in filing a police report.

Employees

The person who is exposed to victimisation, harassment, or sexual harassment or who suspects that others are exposed:

- Speak up straight away! 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 leader for help, support and guidance. If you feel that your immediate leader is part of the problem or if you do not receive sufficient help, you can contact your HR Business Advisor, Work Environment Representative or leader's leader.
- You can also contact the health service, Hälsoslussen for support and guidance.

Information Classification: Internal

_

⁴ AFS 2001:1 Systematiskt arbetsmiljöarbete (SAM), AFS 2015:4 OSA and 2 kap. 3 § DiskL

If you think that none of the above instances help, there is also a <u>Whistleblowing function</u> that is an independent party that you can contact in case of events that are not in line with the company's policies and values.

The one who exposes others

In cases of victimisation or harassment that lead to disciplinary actions, the responsible manager and HR Business Advisor should act in accordance with applicable laws and agreements.

The type of disciplinary actions that become relevant depends on the nature and extent of the victimisation or harassment. Examples of disciplinary actions are warnings both verbally and in writing, relocation and, in rare cases, termination due to personal reasons or immediate dismissal (in cases of e.g. violence or threats of violence). If the victimisation or harassment is of a criminal nature, a police report will also be made.