Document No: GPL HR 100

Policy Name: Anti-Harassment and Anti-Discrimination Policy

Responsible Function/Business Segment: Human Resources

Effective: 01.04.2022

Coverage: Global-All employees

Policy Overview & Objective

The **Anti-Harassment and Anti-Discrimination Policy** outlines FPS's stance regardingthe creation and maintenance of a work environment in which people are treated with dignity, decency, and respect. The environment of FPS should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Employees should be able to work and learn in a safe yet stimulating atmosphere. For that reason, FPS will not tolerate discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, FPS will seek to prevent, correct, and discipline behavior that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to respond appropriately to ensure that prohibited conduct does not occur.

FPS is committed to conducting its business in a manner that is consistent with the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. At FPS, we respect the fundamental rights of our employees and are committed to fair, respectful, and inclusive employment practices across all our operations.

FPS does not tolerate discrimination on the basis of pregnancy, HIV status, or any other protected characteristic. We do not require HIV or pregnancy testing during recruitment or employment, except where required by applicable law, and no employment decision will be based on an individual's pregnancy or HIV status.

To the extent this policy does not comply with country law or an applicable labor agreement, the requirements of such law or agreement shall be followed. Questions regarding this policy should be directed to your manager/supervisor, your Regional Human Resources Department or the Responsible Corporate Function or Business Segment.

The Policy

FPS, in compliance with all applicable country anti-discrimination and harassment laws and regulations (including all national, state, provincial and local laws), enforces this policy in accordance with the following definitions and guidelines:

- Discrimination
- Harassment
- Sexual Harassment
- Retaliation

Discrimination

FPS prohibits discrimination in the provision of employment opportunities, benefits or privileges; the creation of discriminatory work conditions; and the use of discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, based on the person's gender, sexual orientation, race, color, religion, ancestry, national origin, disability status, age, veteran/military status, marital status, gender identity, genetic information or any other characteristic protected by applicable law.

Discrimination of this kind may also be strictly prohibited by various applicable national, state, provincial or local laws.

Harassment

FPS prohibits harassment of any kind and will take appropriate and prompt action in response to complaints or knowledge of violations of this policy. Please also see the **Fair Treatment of Others Policy.**

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's gender, sexual orientation, race, color, religion, ancestry, national origin, disability status, age, veteran/military status, marital status, gender identity, genetic information, any other characteristic or other category protected by applicable law and includes epithets, slurs and negative stereotyping.

- Non-verbal harassment includes distribution, display, or discussion of any written or graphic material that ridicules, denigrates, insults, belittles, or shows hostility, aversion, or disrespect toward an individual or group based on gender, sexual orientation, race, color, religion, ancestry,national origin, disability status, age, veteran/military status, marital status, gender identity, genetic information, any other characteristic or other category protected by applicable law.

Sexual Harassment

Sexual harassment may be a form of unlawful employment discrimination under applicable law and is prohibited under this policy. For purposes of this policy, sexual harassment is defined asunwelcome conduct of a sexual nature, whether verbal or physical, when:

- Submission to or rejection of such conduct is made a term or condition of an individual's employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions, such as promotion, demotion, termination or pay; or
- Such conduct substantially interferes with an individual's employment or creates an intimidating, hostile, or offensive working environment.

There are two types of sexual harassment:

- "Quid pro quo" harassment, where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) is in a position to engage in quid pro quo harassment.

- "Hostile work environment," where the harassment creates a hostile, offensive, or intimidating working environment. A hostile work environment can be created by anyone in the work environment, whether by supervisors/managers, other employees, vendors or customers. Hostileenvironment harassment may include verbal remarks of a sexual nature, unwelcome sexual materials, or even unwelcome physical contact.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibited form of harassment, including that which is sexual in nature and unwelcome.

- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and Internet postings; or other form of communication that is sexual in nature and offensive.

- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

Retaliation

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a good faith complaint of discrimination or harassment
- Being a witness in the investigation of a complaint
- Serving as an investigator of a complaint

The Procedure

FPS will courteously treat any person who invokes this complaint procedure and handle all reports promptly. FPS will maintain confidentially to the extent possible in light of the need to conduct an investigation and take appropriate corrective action. Because of the damaging nature of harassment to the victims and to the entire workforce, aggrieved employees are strongly urged to use this procedure. However, filing groundless or malicious complaints is an abuse of the policy and will be treated as a violation.

FPS has established the following procedure for filing a complaint of harassment, discrimination, or retaliation.

1. An individual who feels harassed, discriminated, or retaliated against, or who has witnessed such conduct (the "reporting employee"), may initiate the reporting process by filing a complaint with their HR Representative. If the reporting employee is uncomfortable making the complaint to his or her HR representative, the reporting employee may, alternatively, make the complaint to the Global HR Director (HRD) Once a complaint is made, the reporting employeewill be asked to submit a written and signed complaint form that provides reasonable details regarding their allegations. If a supervisor or manager becomes aware that harassment, discrimination, or retaliation is occurring, either from personal observation or as a result of an employee coming forward, the supervisor or manager must immediately report it to the HR Representative or HRD.
2. Upon receiving a complaint or being advised by a supervisor or manager that a violation of the policy may be occurring, the HR Representative will notify the HRD so that an investigation can be commenced.
3. Promptly after receiving the complaint, the HR Representative will notify the related person(s) against whom the complaint is made of a complaint and initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of the policy occurred.
4. During the investigation, the person conducting the investigation, together with other managementemployees, will interview the reporting person, the respondent and any witnesses to determine whether the alleged conduct occurred.
5. The investigation will be conducted in a prompt and through manner, after which the person conducting the investigation will conclude the investigation and submit a written report of or discuss his or her findings with the HRD.
6. If it is determined that harassment, discrimination, or retaliation in violation of the policy has occurred, the person conducting the investigation will recommend appropriate disciplinary action. The appropriate action will depend on the following factors: a) the severity, frequency and pervasiveness of the conduct; b) Prior valid complaints made against the respondent by the reporting person or others; and c) the nature and quality of the evidence (e.g., first-hand knowledge, credible corroboration).
7. If the investigation is inconclusive or if it is determined that there has been no violation of thepolicy, but potentially problematic conduct may have occurred, the person conducting the investigation may recommend appropriate preventive action.
8. Promptly after the investigation is concluded, the HR Representative or other person conductingthe investigation will meet with the reporting employee and the person against whom the complaint has been made ("respondent") separately, notify them of the findings of the investigation, and inform them of the action being recommended.
9. The reporting employee and the respondent may submit statements to the person conducting the investigation challenging the factual basis of the findings. Any such statement must be submitted no later than five working days after the meeting with the HR Representative or other person conducting the investigation in which the findings of the investigation are discussed.

10. Promptly after the reporting person or respondent submits such a statement, FPS will review the investigative report and any statements submitted by the reporting person or respondent, discuss results of the investigation with the HR Representative or appropriate internal investigator and other management staff as may be appropriate, and decide what action, if any, will be taken. TheHR Representative or appropriate internal investigator will discuss FPS's decision to the reportingperson, the respondent and the appropriate management assigned to the department(s) in which the reporting person and the respondent work. FPS's decision will include a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed

Confidentiality

During the complaint procedure, the confidentiality of the information received, the privacy of the individuals involved and the wishes of the reporting person will be protected to the extent reasonably possible, subject to applicable law. The expressed wishes of the reporting person for confidentiality will be considered in the context of FPS's legal obligation to act on the report and the right of the party against whom the report is made to obtain information. In addition, any notes or documents written by or received by the person(s) conducting the investigation will be kept confidential to the extent possible andsubject to applicable law.

Alternatives

Nothing in the policy may prevent the reporting person or the respondent from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.

FPS Ethics Hotline – An option for reporting concerns confidentially and anonymously where permitted by law.
This service is available 24 hours a day, 7 days a week in all FPS Countries.
Web: https://app.mycompliancereport.com/MCR (Company access ID is FPSI)
Call:

Belgium: 0800-73-785	**Hungary**: 06-80-088-016	**Ukraine**: 0800-801-415
Chile: 800-914-417	**Romania**: 0800-360-890	**US**: 888-644-5762
China: 400-120-1832	**Spain**: 900-876-223	**Vietnam**: 84 24 4458 2093
France: 805-0805-985-609	**Turkey**: 0800-621-2435	**Netherlands:** 0800 0226957
Germany: 0800-1844970	**UK**: 0800-102-6413	**Ireland:** 1800 851 763
Mexico: 800 681 6918	**India:** 000 800 050 3445	**Poland:** 800 005 189

References

This policy should be viewed in terms of **Fair Treatment of Others Policy (HR 102 – Global)** and **Relationships at Work Policy (HR 105 – Global).**

Addendum

Adopted: 01.04.2022