
**NON-DISCRIMINATION AND
ANTI-HARASSMENT POLICY**

thinkproject

PCMS

Management system: PCMS

Product: ALL

Document ID: PCMS_0001

Version: 1.0

Classification: Open

Created by	Andrea Mair	22.07.2022
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Approved by	Christina Hübschen	29.07.2022
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Date of original issue	04.08.2022
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1 PURPOSE

Thinkproject Group is proud of its diverse workforce. As an international company committed to diversity and inclusion, we want to ensure that all employees understand:

- The **importance** of maintaining a safe work environment that is free from all forms of discrimination and harassment
- Our **expectations** regarding behavioural requirements and principals for business conduct
- The **contribution** they can make to keep Thinkproject Group a great place to work

Our Code of Conduct provides the foundation of how we conduct business. The principles outlined in the Code of Conduct are aligned with international human rights and labour standards, including the United Nations (UN) Global Compact and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

This policy focuses on our commitment to the sixth principle of the UN Global Compact, which states that businesses should support *"the elimination of discrimination in respect of employment and occupation."*

2 COMMITMENT

Thinkproject Group is committed to ensuring equal opportunity and maintaining a safe work environment free from discrimination and harassment including moral and sexual harassment, sexist conduct and bullying. This includes our commitment to eliminate any type of discrimination in respect to employment and occupation at Thinkproject Group based on ethnicity, gender, skin colour, religion, political opinion, disability, family status, sexual orientation, age, nationality, marital status, social background and physical, mental and sensitive medical conditions.

Thinkproject Group's commitment is not only to comply with all applicable laws, but also follow relevant international standards such as ILO's declaration on Fundamental Principles and Rights at Work within its scope of influence.

Any form of bullying and harassment is prohibited at Thinkproject Group. This includes any inappropriate conduct or comment by a person towards another person that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated.

Examples of prohibited behaviour include (but are not limited to):

- Verbal or written conduct such as derogatory remarks, slurs, or sexual advances, invitations or comments
- Visual conduct such as derogatory or sexually oriented posters, photography, cartoons, drawings, emails or gestures
- Physical conduct such as assault, unwanted touching, intentionally blocking normal movement, interfering with work because of sex, ethnicity, gender, skin colour, religion, political opinion, disability, family status, sexual orientation, age, nationality, marital status, social background and physical, mental and sensitive medical conditions
- Threats or demands to submit to sexual requests as a condition of continued employment, or to avoid loss
- Offers of employment benefits in return for favours

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REPORTING PROCEDURES

If you believe that you have been subjected to any form of discrimination or harassment, you should report it immediately to your direct supervisor or People & Culture Business Partner. Thinkproject Group is committed to maintaining confidentiality and anonymity of the person making the report to the extent possible. You also have the option to submit an anonymous report through Thinkproject Group's whistleblower system. Details of reporting procedures and processes can be found in the corresponding Whistleblowing Policy.

RESPONDING TO COMPLAINTS

Every reported incident will be investigated in a fair, timely and discreet manner, and necessary corrective action will be taken where appropriate. Any employee that, after internal investigation, is believed to engage in harassing or discriminatory behaviour will be subject to disciplinary action, up to and including possible termination of employment.

NO ACT OF RETALIATION

Thinkproject Group is committed to the principle of non-retaliation: employees reporting a concern in good faith or participating in an investigation will not be harassed, retaliated against, or suffer adverse employment consequences, such as discharge, demotion, suspension and/or discrimination with respect to the terms and conditions of employment.

RESPONSIBILITY STANDARDS FOR SUPPLIERS

The principles described above also apply to our supply chain. This includes the expectation that our suppliers and partners do not allow any form of discrimination and instead promote a workplace characterised by equal opportunity, diversity and respect. This expectation is outlined in Thinkproject Group's Supplier Code of Conduct.

3 AREA OF APPLICABILITY

This policy applies to Thinkproject Group and its subsidiaries.

4 REFERENCE DOCUMENTS

- Code of Conduct
- Supplier Code of Conduct
- Whistleblowing Policy

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5 DOCUMENT CONTROL

Version	Date	Author	Approved by	Details of changes made
1.0	22.07.2022	Andrea Mair	Christina Hübschen	First version

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