

FLSmidth Group

Harassment Sub-Policy

1 Introduction

FLSmith is committed to creating and maintaining safe, healthy and productive working environment for all employees in all locations. The Harassment Sub-Policy sets out the rules and approach to implementation and governance in place in order to achieve this.

We take a zero-tolerance approach to instances of harassment, including unwanted and/or inappropriate sexual behaviour directed at co-workers or other business partners.

The scope of this Sub-Policy includes all premises and property of the company and extends to off-site interactions between company employees as well as between company employees and employees of business partners. The policy is also relevant outside of working hours and applies to non-verbal communication, including written communication and body language. The scope of this policy also includes the recruitment, hiring and dismissals process for future and former employees and business partners, including on-site contractors.

2 Rules

2.1 Definition

Harassment occurs when one or more employees feel unfairly and/or inappropriately treated, spoken to, or about, at work or in situations related to the workplace, such as work-related activities taking place off-site. It includes situations of intimidation, humiliation, physical threats, bullying, assault or unwanted sexual approaches.

Individual incidents of a harassment may be part of a broader culture of a hostile working environment.

Harassment and / or discrimination is not allowed or condoned regardless of the position, level of seniority or geographic, cultural or work context of the harasser.

Harassment may include both speech and conduct and may be based in the specific relationship between two or more individuals in the workplace. It may also be based on a form of discrimination of one or more employees, based on personal characteristics they may possess. While this policy does not explicitly address discrimination, which is defined and prohibited by other FLSmith policies, the link with harassment is important to highlight.

2.2 Discrimination

Any harassment based on discrimination of another individual on the basis of their gender, religious or political affiliation, ethnicity, race, sexuality or disability will be taken seriously.

All reported incidents will be investigated and a zero-tolerance approach will be implemented.

2.3 Procedure for reporting a case of harassment

All acts of harassment can be reported to a local Human Resources representative or to Group Compliance via the Whistleblower Hotline. There is also zero tolerance for any retaliation based on the reporting of an allegation of harassment.

We commit to handling investigations procedures in a quick, transparent and confidential, professional and unbiased manner where reports of alleged harassment are submitted.

Where a victim of harassment wishes to use external channels such as a labour ombudsman or tribunal we will cooperate with this process in good faith. This is also the case where the victim of harassment wishes to pursue criminal charges.

3 Implementation

Implementation of this Sub-Policy will be rooted in local business units, through the Human Resources function, supported by the network of Regional Compliance Representatives. While not as such subjective, experiences of harassment may be culturally specific and may frequently require knowledge of local work culture and contexts to investigate and remediate, at least as an initial step.

4 Governance

This Sub-Policy is approved by the Group CEO. The policy is maintained, implemented and updated by Group Compliance. Note that there may be local or regional policies that puts in place stricter rules on top of this group level policy.