



## Policy regarding harassment, sexual harassment, and retaliation

Version: 0.1

Adopted: by The Board of Directors of Concentric AB on 18<sup>th</sup> April 2024

Applicable Concentric AB (publ) (hereinafter “Concentric”) within:

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### 1 CONCENTRIC’S COMMITMENT

Concentric has zero tolerance for any form of harassment or sexual harassment at work, whether occurring at or outside the workplace, including conduct on social media.

It is of utmost importance for Concentric that individuals feel safe at work and have the courage to speak up against any form of unwelcomed or offensive conduct. Individuals therefore need to understand that no retaliation will be taken if individuals report or participate in any investigation into alleged harassment or sexual harassment.

### 2 WHO IS THIS POLICY FOR?

This Policy applies to everyone at Concentric and is applicable in all our business operations. Accordingly, the Policy applies to every employee and representative of Concentric, including its subsidiaries, members of the Board of Directors as well as anyone working on behalf of Concentric.

**Harassment includes** any conduct, statement, or gesture, both physical and verbal, which denigrates, ridicules, devalues, insults, or offends a person's dignity and which is associated with at least one of the protected characteristics.

**Sexual harassment includes** any conduct of a sexual nature which offends a person's dignity, such as groping and other unwelcomed physical touching, sexual insinuations, compliments, invites, glances, gestures, nicknames, comments about physical appearance, clothing or private life, and pornographic images.

**Protected characteristics include the following list** which should not be regarded as exhaustive and may differ by country: gender, transgender identity or expression, ethnicity, religion or other religious belief, disability, sexual orientation, age.

Harassment and sexual harassment do not require intent on the part of the harasser. Instead, the person subjected to the conduct decides if the conduct is unwelcome or offensive and constitutes harassment or sexual harassment. However, the harasser needs to understand that their conduct is unwelcomed or offensive. It is therefore important that employees, experiencing any form of unwelcomed or offensive conduct, immediately speak up.

**If individuals experience, witness, or suspect any form of harassment or sexual harassment at work** they should immediately report the incident to their manager or Human Resources. Refer to the “***Guidelines for reporting harassment, sexual harassment, and retaliation***” for further guidance.

Whenever Concentric receives a report about harassment or sexual harassment we act swiftly and immediately launch an investigation into the reported incident. In connection with such investigation Concentric may need to interview the reporting person, the person allegedly subjected to harassment or sexual harassment (if another than the reporting person), the alleged harasser, and any additional witnesses. Concentric will also need to document what has taken place. Any investigative measures will be taken with due regard, consideration, and respect for all involved parties.



Based on the outcome of the investigation, Concentric will take necessary action to prevent and combat continued and future harassment and sexual harassment. The action that may need to be taken depends on the circumstances in each individual case.

## **Guidelines for reporting harassment, sexual harassment, and retaliation**

**Concentric does not accept any form of harassment or sexual harassment** occurring at or in connection with work. Concentric will therefore take immediate action upon receiving a report or upon suspicion arising about any form of harassment or sexual harassment.

**No retaliation will be taken** if individuals report or participate in any investigation into alleged harassment or sexual harassment.

**These guidelines provide advice about:**

- (i) how to act if individuals experience or witness harassment or sexual harassment;
- (ii) how to report experienced or witnessed harassment or sexual harassment;
- (iii) the actions taken by Concentric when a report is received; and
- (iv) the employment law measures that Concentric may take.

### **1 IN THE CASE OF HARASSMENT OR SEXUAL HARASSMENT**

- 1. **Individuals should not blame themselves.**
- 2. **Speak up.** It is important that the harasser understands that their conduct is unwelcomed or offensive.
- 3. **Make comprehensive notes** of the incident (including date, time of day, potential witnesses, or by-standers, what was said or done, reaction).
- 4. **Individuals should let their manager know if any specific support measures**, such as counselling, are needed.

### **2 REPORT HARASSMENT OR SEXUAL HARASSMENT**

If an individual experiences, witness, or suspect any form of harassment or sexual harassment at or in connection with work they should immediately report the incident:

- (a) to their manager; or, if for some reason reporting the incident to their manager would be inappropriate,
- (b) to Human Resources.

Refer to Concentric's whistleblowing policy for further information, for example on how to raise a complaint anonymously.

The individual's manager or another senior manager if appropriate, supported by Human Resources, is responsible for initiating an investigation into the reported incident as a matter of urgency.

The CEO is ultimately responsible for ensuring that Concentric fulfils its legal obligations.



### **3 INVESTIGATIVE MEASURES TAKEN BY CONCENTRIC**

If an individual wishes for Concentric not to initiate, or to cease, any investigation into the reported incident, Concentric will take this into consideration. However, note that Concentric's position is that all incidents involving harassment and sexual harassment need to be investigated to respond appropriately to ensure a work environment free of harassment and sexual harassment.

#### **3.1 Initial information is collected**

In order to allow Concentric to thoroughly investigate the reported incident individuals will be requested to recount the incident.

This may include **describing the following**:

1. The date and time of the incident - when and where did the incident occur?
2. Whether anyone else witnessed the incident?
3. Whether anyone else has been subjected to similar conduct?
4. The individual's reaction.

Any information collected in connection with an investigation will be processed in accordance with applicable law, including the General Data Protection Regulation ("GDPR") or equivalent legislation.

#### **3.2 Additional information is collected**

The additional investigative measures that Concentric may take include *inter alia*:

1. Interview any potential witness(es) or by-stander(s).
2. Interview the alleged harasser(s).
3. Review any text(s), sign(s), poster(s) or other document(s), or scribble or drawing(s).
4. Review any recording(s).
5. Review any e-mail or text message(s) or other message(s) sent using social media.
6. Engage a third-party forensic investigator to perform a forensic investigation.
7. Engage and consult with an external legal advisor.

#### **3.3 Continuous communication**

Parties will be informed about the investigative measures taken and progress of the investigation and any actions that Concentric intends to take. Information provided will be limited so as not to violate any person's integrity.

### **4 POTENTIAL EMPLOYMENT LAW MEASURES**

Based on the outcome of the investigation, Concentric will take necessary action to prevent and combat continued and future harassment and sexual harassment.

**The employment law measures which Concentric may need to take include, *inter alia*:**

1. Launching an information campaign or training.
2. Suspension of parties involved.
3. Issuing a reprimand.



4. Issuing a reminder.
5. Dismissal with notice.
6. Dismissal without notice.

**In case of a serious incident** (e.g., an incident that constitutes a gross violation of Concentric's *policy regarding harassments, sexual harassment and retaliation* or could amount to a criminal offence), Concentric will, unless the circumstances warrant otherwise, dismiss the harasser, either with or without notice. Further, Concentric may need to report the incident to the police.

Concentric will also follow-up in order to ensure that any harassment or sexual harassment has ceased.

Concentric is under no obligation to take any action should the investigation show that the reported incident does not amount to harassment or sexual harassment as defined in applicable law.

Individuals should also be aware that completely unfounded reports may in themselves constitute harassment.

## **Guidelines for investigating harassment and sexual harassment, and prohibition against retaliation**

These guidelines set out the investigative measures that must be taken in immediate connection with either: a) receiving a report about alleged harassment or sexual harassment; or b) suspicion arising about harassment or sexual harassment; at or in connection with work.

The following sections contain information about:

- (v) What constitutes harassment.
- (vi) What constitutes sexual harassment.
- (vii) Concentric's legal obligation to act.
- (viii) The prohibition against retaliation.
- (ix) The preventative action that Concentric is legally obliged to take.

### **1 WHAT CONSTITUTES HARASSMENT?**

Harassment includes any form of physical, verbal, or non-verbal conduct which harms or causes discomfort and thus violates a person's dignity and which is associated with at least one of the following protected characteristics:

1. **Gender:** This characteristic is gender neutral and aims to protect both females and males. In addition, the characteristic protects persons who intend to change or have changed their gender. Harassment associated with gender includes *inter alia* not allowing females to be heard in connection with meetings or assigning skilled females unskilled work duties.
2. **Transgender identity or expression:** This characteristic aims to protect persons who self-identify with or who through their clothing or otherwise express that they belong to



another gender than their biological gender as assigned to them at birth. Harassment associated with transgender identity or expression includes *inter alia* ostracizing or excluding them from using changing rooms or toilets at work.

3. **Ethnicity:** This characteristic aims to protect persons from harassment due to their nationality or ethnic origin, their skin colour or other similar trait. This characteristic also protects persons from harassment due to their connection to an ethnic person. Harassment associated with ethnicity includes *inter alia* racist jokes or nicknames.
4. **Religion or other religious belief:** This characteristic includes both recognised religions and other beliefs that are based on or connected with a religious belief. Also, non-believers are protected under this characteristic. Harassment associated with religion or other religious belief includes *inter alia* offensive comments about attire worn for religious reasons or disparaging comments about traditions rooted in religion.
5. **Disability:** This characteristic includes any permanent physical, mental, or intellectual impairment or limitation of a person's capacity to function. The characteristic includes disability that is a consequence of an injury or illness which existed at birth, occurred thereafter or can be expected to occur. The characteristic also protects persons from harassment due to their close relative's disability. Harassment associated with disability includes *inter alia* to ape or mimic a disabled person.
6. **Sexual orientation:** This characteristic aims to protect all sexual orientations. It protects a person from harassment due to their sexual preferences, frequenting certain places associated with sexual preferences or their relationship or living arrangements. Harassment associated with sexual orientation includes *inter alia* implicit or unconscious bias.
7. **Age:** This characteristic aims to protect persons from harassment due to their biological age. There is no minimum or maximum age; all ages are included. Harassment associated with age includes *inter alia* attributing a person certain character traits based on their generation.

For conduct to constitute harassment, the conduct must be **unwelcome**. Further, the alleged harasser must understand that their conduct violates the dignity of the person subjected to the conduct due to their protected characteristic(s).

## 2 WHAT CONSTITUTES SEXUAL HARASSMENT?

**Sexual harassment includes** any physical, verbal, or non-verbal conduct of a sexual nature which offends a person's dignity by *inter alia* creating an offensive or intimidating work environment or hindering or interfering with a person's performance of their work.

Examples include *inter alia* groping and other forms of unwelcome physical touching, unwelcomed sexual insinuations, compliments, invites, glances, gestures, nicknames and comments about physical appearance, clothing or private life, and pornography.

For conduct to constitute harassment, the conduct must be **unwelcome**. The alleged sexual harasser must understand that their conduct is either unwelcome or offensive, save for when the conduct is "*manifestly offensive*" or where the person subjected to the conduct is in a subordinate or dependent position relative to the harasser.

## 3 CONCENTRIC'S LEGAL OBLIGATION TO ACT

Where Concentric becomes aware of a person at work experiencing harassment or sexual harassment Concentric is legally obliged to investigate and take reasonable action.



**Managers are obliged to take immediate action** upon noticing or suspecting or receiving a report about any form of harassment or sexual harassment at work.

**Managers must act swiftly** - act as soon as they become aware of any form of alleged harassment or sexual harassment occurring or having occurred at or in connection with work.

**Managers practice active listening** - Face the person and have eye contact. Pay attention to non-verbal cues. Do not interrupt. Do not judge. Do not jump to conclusions. Have an objective approach. Pose open questions and request clarifications. Make notes.

**Managers should consider the wishes of the person** subjected to the alleged harassment or sexual harassment. Encourage the person to co-operate in the investigation:

- (i) inform the person of their rights and the protection afforded them under applicable law; Concentric will not retaliate, and will not tolerate that any other person retaliates, against them due to their co-operation;
- (ii) explain that all information uncovered in connection with the investigation will be handled with due regard, consideration, and respect for all involved parties; and
- (iii) explain that Concentric has zero tolerance for harassment and sexual harassment and consequently, that it is important that all instances of alleged harassment and sexual harassment are investigated to enable Concentric to take appropriate action to ensure a work environment free from harassment and sexual harassment.

If the person nevertheless refuses to co-operate, make a note of this, remain in contact with the person, escalate the matter if necessary.

**Managers must observe discretion.** Any information received in connection with an investigation must be handled with discretion and with due regard, consideration, and respect for all involved parties.

**Managers should plan meetings with implied persons well in advance.** Prepare your interview questions. The questions you will need answered will of course vary from case to case. If you need assistance in identifying relevant questions turn to your Human Resources representative.

It may be warranted to instruct the alleged harasser to perform work off-site or to offer them paid time-off from work during the investigation. It may in some cases also be warranted to wholly release the employee from their work duties.

**Managers should gather evidence.** Are there text messages, messages sent via social media, or e-mail messages containing unwelcome or offensive content? Are there phone records or records of sent text messages? Are there video or audio recordings or photographs of the incident? Are there signs, posters, scribble or drawings?

In some cases, the alleged harasser may need to be instructed to return their work equipment to enable a forensic investigation. Document in writing the investigative measures taken.

**Managers must analyze and draw a conclusion.** The aim of the investigation is to conclude if the incident and reported conduct constitutes harassment or sexual harassment as defined in applicable law. Further, the investigation aims to discover any evidence in support of such conclusion and any potential subsequent employment law measures taken in relation to, typically, the alleged harasser.



**Managers should keep involved parties informed** about the investigative measures taken and progress of the investigation. Upon conclusion of the investigation, inform involved parties about the action to be taken in order to prevent future harassment and sexual harassment.

Manager should not disclose information which enables the alleged harasser (or anyone else) to obstruct the investigation (by e.g., eliminating evidence or intimidating witnesses). Nor should they disclose information that may violate a person's integrity.

**Managers must take appropriate action.** What constitutes appropriate action depends on the circumstances in each individual case.

**As a manager, if you are unable to properly investigate the incident,** appropriate action should be discussed with Human Resources.

**If a manager concludes that the incident does not constitute harassment or sexual harassment,** consider launching an internal information campaign or training about Concentric's values and what constitutes harassment and sexual harassment.

**If a manager concludes that the incident constitutes harassment or sexual harassment,** consider (in addition to the above) either:

- (a) issuing the harasser with a reprimand or reminder, or in case of aggravated harassment or sexual harassment.
- (b) terminating the harasser's employment either with or without notice.

Note that employment law measures may need to be taken within certain time frames.

**It is important to follow-up** in order to ensure that the harassment or sexual harassment has ceased.

#### **4 PROHIBITION AGAINST RETALIATION**

Concentric does not tolerate any form of retaliation against any person who rejects, denounces, or reports unwelcomed or offensive conduct. Nor does Concentric tolerate any retaliation against any person having co-operated in connection with an investigation into alleged harassment or sexual harassment.

Any person having retaliated against any person having rejected, denounced, or reported any form of unwelcome or offensive conduct or having cooperated in any investigation into alleged harassment or sexual harassment will themselves be subject to employment law measures.

#### **5 PREVENTATIVE ACTION**

Managers are obliged to:

1. Ensure everyone within the team receives relevant training about harassment and sexual harassment. Keep a record of any training provided.
2. Ensure an on-going discussion about Concentric's values. Cultivate openness in the workplace. Clearly communicate the boundaries of conduct that is accepted versus unaccepted.
3. Be available to co-workers for two-way communication.



**6 QUESTIONS?**

Questions regarding the Policy or Guidelines or their interpretation may be directed to your manager or Human Resources.