



# Non-Discrimination and Anti-Harassment Policy<sup>1</sup>

## Framework

<b>Amended by</b>	Candriam Human Resources Department
<b>Approved by</b>	Strategic Committee of the Candriam Group
<b>Sent to</b>	Candriam employees
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<sup>1</sup> This procedure applies if a local procedure is not already in place.

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# 1. Preamble

At Candriam, we are committed to creating a work environment in which all individuals are treated and treat others with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits illegal discriminatory practices, including harassment, bullying, retaliation, explicit bias and discrimination.

This is why Candriam expects all relationships within and outside the workplace (such as business travel, business meetings, work-related events or social functions) to be professional and free from prejudice, discrimination and harassment. A fair and inclusive working environment is the foundation of our culture, values and identity. We will make every reasonable effort to ensure that all individuals concerned become familiar with this policy and know that any complaints will be appropriately reviewed and resolved.

As a responsible employer that recognises the importance of diversity and inclusion, one of our priorities is to embed equal employment opportunities at Candriam, free from discrimination or harassment based on ethnicity, skin colour, religion, sex, sexual orientation, gender identity or expression, age, maternity (including pregnancy), paternity, disability, marital status, citizenship, nationality, social and professional background or any other characteristic protected by law.

By supporting an inclusive environment where differences are valued and appreciated, encouraging openness and respect, and welcoming diverse teams and perspectives, we believe that healthy collaborations will thrive and that each individual will have the opportunity to contribute and express their full potential.

# 2. General principles

## **Zero tolerance towards harassment, discrimination and retaliation**

By adopting a zero-tolerance approach to harassment and discrimination or any adverse behaviour that impacts the mental health and well-being of staff, we are committed to making sure our staff can work and succeed without having to face negativity or bias and to handling all allegations in a professional, effective, confidential and discrete manner.

Our main objective is to ensure that everyone is treated fairly and feels valued, that they have equal opportunities to succeed and contribute to Candriam's lasting success, in an environment that all employees want to join and stay in.

No one will be victimised for filing a complaint in good faith but, if a complaint is made maliciously, disciplinary action may be taken accordingly.

## 3. Definitions

### What is discrimination?

Discrimination is the making of unjustified distinctions between people and any harmful behaviour that targets or demeans a person on the basis of certain characteristics, i.e. a trait of someone's identity that is legally protected and defined by local legislation (i.e. ethnic origin, sex, sexual orientation, age or religion).

As with all discrimination, stereotypes about capabilities and motivations are often at the root of treating someone differently.

### What is harassment?

Harassment is defined as unwanted behaviour related to 'protected characteristics' for the purpose or effect of undermining dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment is also unwanted conduct of a sexual nature that has the same purpose or effect: this may result in the conclusion or performance of the employment contract in various ways, including:

- imposing on others conduct of a sexual nature as an explicit or implicit condition of employment,
- making employment decisions affecting an individual based on whether or not they consent to conduct of a sexual nature,
- the act of engaging in such conduct significantly interfering with a person's job performance or creating an intimidating, hostile or offensive work environment.

Examples of harassment prohibited by this policy include:

1. gender-based offensive jokes, teasing or pranks;
2. unwanted and repeated flirting, advances or proposals of a sexual nature;
3. verbal abuse of a sexual nature;
4. explicit or degrading comments about a person's appearance or sexual activity;
5. offensive physical contact;
6. offensive and suggestive letters, notes or invitations.

Harassment is verbal, written or physical conduct that disparages or shows hostility or dislike towards someone for the purpose or effect of unreasonably interfering with the professional performance of an individual or otherwise affecting an individual's employment opportunities.

Harassment can also include making fun of, imitating or putting someone down.

A person may be harassed even if they are not the 'target': for example, by racist jokes about a different ethnic group if these jokes create an offensive environment.

The definitions of harassment and discrimination as mentioned in the policy are not exhaustive but indicative. Reference is made to regulations and in particular to the legal, regulatory and jurisprudential definitions applicable in each country.

### What is bullying and rudeness?

Bullying and rudeness are offensive, intimidating, malicious or insulting behaviour that involves an abuse of power that may cause a person to feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and power through fear and intimidation.



Bullying and rudeness are disrespectful, unfair and harmful to the workplace. These behaviours can be subtle and take the form of discourteous conduct or be more overt. They are not aligned with Candriam's values and behaviours and will not be tolerated.

Bullying may take the form of physical, verbal and non-verbal behaviour. Bullying may include:

- physical or psychological threats;
- excessive and intimidating levels of supervision;
- derogatory and inappropriate remarks about an individual's performance, etc.

Legitimate, reasonable and constructive criticism of your performance or behaviour, or reasonable instructions given to you in the course of your work, do not in themselves constitute bullying. Fair and reasonable behaviour that does not amount to bullying could include:

- constructive feedback;
- not being invited to a meeting where your attendance is not required;
- being subjected to a procedure related to your performance where your performance is not at an appropriate level.

## 4. Training and awareness

A Diversity and Inclusion Committee composed of members from diverse backgrounds is actively involved in the application of all principles for an inclusive, safe, healthy and equitable workplace in accordance with the Diversity and Inclusion Charter.

Specific training measures have been put in place by the Learning & Development team to raise awareness, combat all forms of stereotypes and unconscious biases, thus encouraging the development of inclusive behaviour.

In particular, mandatory annual training on the 'Prevention of Discrimination and Harassment' is also offered to everyone.

By establishing an inclusive culture in which diversity is recognised and valued, Candriam is committed to giving each person the opportunity to contribute and express their full potential regardless of their gender, country of origin, ethnic origin, age, disability and social or professional experience.

Through this openness and respect for common values, Candriam applies a holistic strategy that aims to create, strengthen and maintain a diverse talent pool.

The main objective is to ensure that everyone is treated fairly and feels valued, that they have equal opportunities to succeed and contribute to Candriam's lasting success, in an environment that all employees want to join and stay in.

## 5. Report an incident of harassment or discrimination

First, Candriam encourages people who believe they are victims of such behaviour to inform the offender promptly, insofar as possible, that their behaviour is unwelcome and ask them to put an end to it.

Candriam also encourages the reporting of any incident perceived as discrimination, harassment or retaliation, regardless of the identity or position of the offender.

Early reporting and action have proven to be the most effective method of resolving actual or suspected incidents, and it is important to take quick and constructive action before the relationship becomes irremediably tense.

Those who believe they have been the victims of such conduct should talk to their line manager, any member of the management team or Human Resources who may provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate or have not been successful, the issue must be raised formally by sending a written report in accordance with Candriam's reporting procedure.

At the same time, if they suspect or find that others are being discriminated against or are potentially victims of harassment, any employee may file a report with Human Resources.

When they receive a report in accordance with this procedure, the HR Director is responsible for conducting a formal investigation as described below.

### **Candriam's reporting procedure**

Candriam has established the following procedure for filing a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

Complaints must be submitted in writing as soon as possible after an incident. The HR Director may assist the complainant in completing a written statement or, in the event that the employee refuses to provide information in writing, the HR Director will transcribe the verbal complaint.

If an individual does not wish to report an allegation to their line manager or use Candriam's reporting procedure, they may inform staff representatives or occupational health department and report an infringement of their individual freedoms.

In any event, all allegations will be thoroughly reviewed in accordance with our investigation procedure.

### **Candriam's investigation procedure**

When they receive a complaint or are notified by a supervisor, manager or employee representative that this policy has been breached, the HR Director will inform Management and review the report with the company's legal counsel.

The HR Manager will initiate an investigation to determine whether there is reasonable reason to believe that the alleged violation of this policy has occurred.

The investigation will be conducted by someone with sufficient seniority who has no prior involvement in the complaint, with the support of an external expert in the field if necessary. The investigation may also be conducted, at the request of the complainant or the accused person, by a third party recognised for their expertise on this type of situation.



Candriam will maintain confidentiality throughout the investigation procedure consistent with a proper investigation and appropriate corrective action.

If necessary, the complainant and the implicated person will be separated during the investigation, either by means of an internal transfer or administrative leave with their agreement.

During the investigation, the HR Director and/or appointed expert (if necessary) will interview the complainant, defendant and any witness to determine whether the alleged conduct occurred. The investigation may include individual interviews with people who may have other relevant knowledge. If necessary, Candriam may decide to request support from an external party (subject to a strict obligation of confidentiality).

Upon completion of the investigation, the HR Director or any other person in charge of the investigation will submit a written report of their findings to the company. If a violation of this policy is determined to have occurred, the HR Director will recommend appropriate disciplinary action.

If the investigation is not conclusive or if it is determined that the policy was not violated but potentially problematic conduct may have taken place, the HR Director may recommend appropriate preventive action.

Management will review the investigation report and any statements submitted by the complainant or defendant, discuss the results of the investigation with the Director of HR and other members of Management, if necessary, and decide what action should be taken, if any.

Any employee found guilty of misconduct is subject to disciplinary action up to and including dismissal. Punitive measures may include, for example, specific training or disciplinary action that may potentially lead to termination of employment.

Once the final decision has been taken by General Management, the Director of HR will meet separately with the complainant and the implicated person and will inform them of the results of the investigation. If disciplinary action is to be taken, the defendant will be informed of the nature of the disciplinary action and how it will be carried out.

Retaliation against an individual for reporting harassment or discrimination, or for participating in an investigation of a complaint of harassment or discrimination, is a serious breach of this policy and will be subject to disciplinary action in the same way as the harassment or discrimination itself. Retaliation must be reported immediately and will be promptly investigated and addressed.

False reports or malicious reports of harassment, discrimination or retaliation (as opposed to complaints that, even if incorrect, are made in good faith) may be subject to appropriate disciplinary action.

