

ANTI-BULLYING AND HARASSMENT POLICY

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1.INTRODUCTION

Established in 2003, WageIndicator Foundation is an independent non-profit organisation whose mission is to promote transparency in the labour market by sharing and comparing income data through its network of national websites. WageIndicator has operations in more than 200 countries worldwide. With headquarters in Amsterdam, the Foundation has regional hubs in Bratislava, Islamabad, India and Indonesia.

2. POLICY STATEMENT

Workplace bullying and harassment has a detrimental effect on WageIndicator and its people. It can create an unsafe working environment, result in a loss of trained and talented workers, cause the breakdown of teams and individual relationships, increase absenteeism and reduce efficiency and productivity. People who are bullied and harassed can become distressed, anxious, withdrawn and can lose self-esteem and self-confidence. Workplace bullying and harassment is also in some contexts, against the law. For these reasons, bullying and harassment will not be tolerated by the WageIndicator in all its operations across the world.

WageIndicator is committed to creating a workplace atmosphere which fosters mutual respect, integrity and professional conduct. In keeping with this commitment WageIndicator has created this policy framework along with a reporting framework.

3. SCOPE

WageIndicator recognises that workplace bullying may involve comments and behaviours that offend some people and not others. WageIndicator accepts that individuals may react differently to certain comments and behaviour. That is why a minimum standard of behaviour is required of workers. This standard aims to be respectful of all workers.

WageIndicator recognises that workplace bullying can take place through a number of different methods of communication including face to face, email, text messaging and social media platforms. As such, this Policy applies to all methods of communication through which workplace bullying can take place. This Policy applies to behaviours that occur:

- In connection with work, even if it occurs outside normal working hours; During work activities, for example, when dealing with clients;
- At work related events and functions, for example, at festive celebration; and on social media platforms where workers interact.

This policy applies to all supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals for specific projects.

4. WHAT IS BULLYING?

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority.

Bullying may be physical, verbal, or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.

5. EXAMPLES OF BULLYING INCLUDE:

- abusive, insulting or offensive language or comments
- physical or psychological threats;
- violent, aggressive or intimidating conduct;
- belittling or humiliating comments;
- victimisation overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about a person or their performance; shouting at associates;
- persistently picking on people in front of others or in private;
- blocking promotion and training opportunities;
- regularly and deliberately ignoring or excluding staff from work activities or work related social events;
- setting a person up to fail by overloading them with work or setting impossible deadlines;
- regularly making the same person the butt of jokes.

Legitimate and reasonable criticism of a worker's performance or behaviour, or reasonable management instructions do not amount to bullying.

6. WHAT IS HARASSMENT?

Harassment is any unwanted conduct (sexual or otherwise) that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. A person may be harassed even if they were not the intended "target". Harassment also includes treating someone less favourably because they have not submitted or refused to submit to such behaviour in the past.

Sexual harassment in the workplace is different from general sexual harassment in that it is directly related to the way one makes a living. It is often used as a form of power-play, and can occur in many stages of the job cycle, from recruitment to promotion.

It can include direct sexual advances or propositions, including higher-ranked staff asking for sexual favours from juniors.

It can also include intimidating or excluding employees to jeopardise their employment status. And it can mean creating a hostile workplace for workers by using sexist jokes, remarks, or pinning up sexually explicit or pornographic photos. Whether the offense is made by a manager, co-worker, or even a non-employee like a client, contractor, or vendor, if the behaviour creates a hostile work environment or interrupts an employee's success, it is considered unlawful sexual harassment.

In many countries it is unlawful to harass a person because of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It also includes conduct of a sexual nature (sexual harassment).

Harassment of any kind is unacceptable, even if it does not fall within any of these categories.

7. EXAMPLES OF HARASSMENT INCLUDE, BUT ARE NOT LIMITED TO:

- unwanted physical conduct including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour;
- offensive e-mails, text messages or social media content or the display of offensive materials;
- unwanted jokes, banter, mocking, mimicking or belittling a person.

8. MANAGERS' AND SUPERVISORS' ROLES

Managers and supervisors have an important role to play in fostering a culture that does not tolerate or encourage harassment, bullying or workplace violence and should ensure that they do not engage in any conduct of this nature themselves.

Managers and supervisors should also ensure that team members understand this policy and consequences of non-compliance. When managers and supervisors observe harassment, bullying or workplace violence occurring, they should take steps to prevent this conduct from continuing and warn the person or people involved of the consequences if the behaviour continues (including disciplinary measures up to and including termination of employment).

Managers and supervisors must manage grievances raised by staff in consultation with the Director of Operations.

WageIndicator expectations of everyone associated with their work:

- Not to engage in harassment, bullying or workplace violence;
- Not to aid, abet or encourage others to engage in harassment, bullying or workplace violence;
- To behave in a responsible and professional manner;
- Treat others in the workplace with courtesy and respect;
- Listen and respond appropriately to the views and concerns of others.
- To be fair and honest in their dealings with others.

9. BREACHES OF THIS POLICY

Bullying and harassment are not tolerated at WageIndicator and everyone is required to treat each other, along with our stakeholders with dignity and respect. Breaches of this policy will be dealt with in accordance with our disciplinary procedure. Serious cases of bullying or harassment may amount to gross misconduct resulting in dismissal.

Staff and associated personnel who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result of making a complaint.

10. WHAT TO DO IF YOU BELIEVE YOU ARE BEING HARASSED OR BULLIED?

10.1. INFORMAL APPROACH

You may be able to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

If you feel able to, tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You should keep a note of the date and what was said and done. This will be useful if the unacceptable behaviour continues and you wish to make a formal complaint.

If this is too difficult for you, then please contact the Operations Director Rupa Korde (rupakorde@wageindicator.org) for advice and assistance. They may for example speak to the person concerned on your behalf, or accompany you when you speak to them.

If the informal approach is not appropriate, or has not been successful, you should raise a formal complaint.

10.2. FORMAL PROCEDURE

When anyone associated with WageIndicator feels that they need to deal with an issue of harassment or bullying formally, they should do so in writing to the Director of Operations: Rupa Korde (rupakorde at wageindicator dot org)

We will investigate complaints in a timely, confidential and sensitive manner.

The investigation will be conducted where possible by someone with appropriate seniority and experience, and no prior involvement in the complaint. Details of the investigation, and the names of the people involved, will only be disclosed on a 'need to know' basis. We will consider whether any steps are necessary to manage the ongoing working relationship between you and the person accused during the investigation.



11. CONSEQUENCES OF A BREACH OF THIS POLICY

If after due investigation we consider that an associate has been harassed or bullied by anyone associated in a work capacity at WageIndicator the matter will be dealt with under the disciplinary procedure as a case of possible misconduct or gross misconduct. The person concerned may be suspended with their contract in place until proceedings have been concluded. If the complaint of bullying or harassment is upheld, a disciplinary penalty may be imposed up to and including termination of the contract, depending on the seriousness of the offence and all relevant circumstances.

Some bullying or harassment will constitute unlawful discrimination if it relates to any of the Protected Characteristics in the country of operation as detailed above. Such behaviour could constitute a criminal offence, punishable by a fine and/or imprisonment.

If someone makes a complaint which is not upheld, and the WageIndicator has good grounds for believing that the complaint was not made in good faith, WageIndicator will take disciplinary action against the person making the malicious complaint.

12. PROTECTION AND SUPPORT FOR THOSE INVOLVED

Anyone who makes complaints in good faith, or who participates in any investigation must not suffer any form of retaliation or victimisation as a result. Any person from WageIndicator engaged in retaliation will be subject to disciplinary action

13. RECORD-KEEPING

Information about a complaint may be placed on either party's personnel file, along with a record of the outcome and any other notes or documents compiled during the process. These will be processed in accordance with WageIndicator's Data Protection policy.

14. HOW CAN WE ALL HELP TO STOP BULLYING AND HARASSMENT?

We all have a shared responsibility to help create and maintain a working environment free of bullying and harassment. You can do this by:

- Considering how your own behaviour may affect others, and changing it;
- Being receptive, rather than defensive, if asked to change unacceptable behaviour;
- Treating your colleagues with dignity and respect;
- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable;
- Intervening, if possible, to stop harassment or bullying, and giving support to victims;
- Reporting harassment or bullying to your manager or another appropriate officer of the Company;
- Being open, honest and objective in any investigation of complaints.



15. IMPLEMENTATION AND REVIEW

This policy will be shared with staff and all stakeholders as part of the induction process when joining WageIndicator.

Training will be provided for supervisory board members, directors, international staff, its employees (full time or part time) working across the globe, interns, consultants and contracted individuals.



- **Date of Approval by Supervisory Board: June 28, 2022**
- **Date of Policy Review: December 2025**
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