

# Group Anti-Discrimination & Harassment Policy



## 1 INTRODUCTION

CTP is committed to maintaining a work environment that demands respect for the dignity of each individual. Discrimination, sexual and other harassment is considered unacceptable and will not be tolerated under any circumstances. CTP's goal in this Policy is to foster safe, equal and inclusive working environments. The Policy reflects the CTP -wide approach to create workplace environment free of discrimination, sexual and other harassment and all gender inequalities.

The Policy will be implemented in each jurisdiction according to local Labour and Anti-Discrimination law or other respective regulation. The Policy is applicable to all CTP Group companies, hereinafter "CTP".

## 2 FORCE OF THE POLICY

The Policy applies to all employees who have concluded an employment relationship with CTP, i.e., the employees employed based on an employment contract and to employees who have concluded agreements on work performed outside of an employment relationship.

This Policy shall provide the protection not only to the CTP's employees but also to all individuals associated with CTP in any way (e.g., the CTP's agents, guests, customers, vendors, and other third parties).

All above stated are for the purpose of this Policy referred to as "CTP Staff".

## 3 DEFINITIONS

- a) "Direct discrimination" means such behaviour (action) including negligence when one person is treated less favourably than another person is treated, was treated, or would be treated in a comparable situation due to the following reasons:
- Race,
  - Ethnic origin,
  - Nationality,
  - Sex including pregnancy, maternity, paternity or sex identification,
  - Sexual orientation,
  - Age,

- Health status or disability,
- Religious belief or world view,
- Citizenship,
- Social origin,
- Family,
- Language,
- Property,
- Marital or family status and duties towards a family,
- Political or other opinions,
- Membership or activities in political parties or movements, trade union organisations or CTP organisations.

Discrimination also includes the cases in which one person is treated less favourably only based on the putative reason mentioned above. Discrimination also includes harassment, sexual harassment, persecution, instruction to discrimination and incitement to discrimination.

- b) "Indirect discrimination" means such behaviour (action) or negligence when based on the seemingly neutral provision, criterion, or practice, one person is disadvantaged in relation to the others based on some of the reasons mentioned under letter a). If this provision, criterion, or practice is objectively justified by the legitimate purpose and the means for its achievement are adequate and necessary, it is not considered indirect discrimination.
- c) "Harassment" means undesirable behaviour related to with the reasons mentioned under letter a)
- Which purpose or result is decrease of the person's dignity and creation of intimidating, inimical, humiliating, humbling or insulting environment, or
  - Which can be justly perceived as the condition for a decision influencing the exercise of rights and duties arising from the labour-law relationships.
- d) "Sexual harassment" means behaviour described under letter c), which is of sexual nature.
- e) "Persecution" means unfavourable treatment, sanction or disadvantage which is the result of exercising the rights under respective local regulation.
- f) "Instruction to discrimination" means behaviour (action) of a person who abuses the subordinate status of another person in order to discriminate against the third person.
- g) "Incitement to discrimination" means behaviour (action) of a person who tries to persuade, is confirming or incites another person so that he/she discriminates against the third person.

#### **4 EQUAL TREATMENT, PROHIBITION OF ANY FORMS OF DISCRIMINATION AND HARASSMENT**

1. CTP shall ensure equal treatment for all CTP Staff as regards CTP Staff working conditions, remuneration for work and other emoluments in cash and in kind (of monetary

value), vocational (professional) training and opportunities for career advancement (promotion).

2. Any form of discrimination in labour-law relationships concluded with the CTP is strictly prohibited. Prohibition of discrimination shall also apply to recruitment regarding job vacancies and termination of labour-law relationships.
3. CTP will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, managers, clients or other non-employees who conduct business with CTP. CTP encourages reporting of all incidents of sexual harassment, regardless of who the offender may be or the position held in at CTP.
4. Different treatment arising from the nature of occupational activities where this different treatment is a substantial requirement necessary for work performance is not considered as discrimination; the purpose followed by this exception must be legitimate and the requirement must be adequate. Other exceptions from the prohibition of discrimination are stipulated by local regulation.

## **5 PREVENTION OF DISCRIMINATION AND HARASSMENT**

1. CTP is committed to promoting a working environment free of discrimination and sexual harassment in which all people are treated with respect.
2. CTP will:
  - Take appropriate measures to promote a harmonious working environment and protect personnel from sexual harassment through preventive measures and, if such conduct has occurred, through action under the Group Grievance Investigation Procedure (see Annex No. 1) and Article VI. of this Policy;
  - Undertake diligent reference checks of external candidates during recruitment processes to ensure that individuals who have a documented history of sexual harassment are not hired;
  - Request that contractors, suppliers, partners adhere to zero-tolerance for sexual harassment and commit to taking adequate action if faced with sexual harassment allegations, in the absence of which, contractual arrangements can be terminated;
  - Provide targeted, preferably, in-person trainings for managers and personnel designated to provide support on sexual harassment under the Policy, building the skills necessary to effectively communicate with affected individuals of sexual harassment and to respond appropriately;
  - Provide ongoing, preferably, in-person training, awareness-raising and skill-building for staff-at-large on diversity, respect, equality and bystander techniques for intervening in situations of sexual harassment and discrimination; and
  - Ensure information and mechanisms are accessible to all staff, as well as, to the extent possible and taking into account the terms and conditions of the contracts with non-staff personnel and other applicable policies, consultants, other personnel, interns and beneficiaries of the CTP's activities in all locations.

## **6 GRIEVANCE PROCEDURE**

1. CTP Staff who believe that they or someone else may be experiencing discrimination or sexual harassment should contact the appropriate supervisor or a designated company contact Group AML & Compliance Officer on [compliance@ctp.eu](mailto:compliance@ctp.eu) or use our anonymous Grievance channel available on CTP intranet. If a CTP Staff does not feel comfortable approaching his/her supervisor with a complaint of discrimination or sexual harassment, for example, because the supervisor is the alleged offender or is related to or has a familial/community connection to the alleged offender, the CTP Staff should report the discrimination or harassment to a company-designated contact: Group AML & Compliance Officer who has the training and resources to respond appropriately. The supervisor or designated contact is obligated to act upon the information in accordance with the procedures laid out in the Group Grievance Investigation Procedure and this Policy.
2. When reporting discrimination or harassment actions (either related to the CTP Staff himself/herself or his/her colleague) the CTP Staff shall follow the Group Grievance Investigation Procedure he/she has been duly acquainted with and which is accessible on the CTP's intranet. In particular, the CTP Staff's notification must be supported by relevant information and submitted in good faith.

## **7 CONSEQUENCES OF A BREACH OF THE POLICY**

1. Every breach of the Policy shall be considered a breach of the CTP Staff's work duties and can lead even to immediate termination of his/her employment relationship or another labour-law relationship in accordance with the relevant provisions of respective Labour Code.
2. Each CTP Staff who became a victim of discrimination or harassment is entitled to proper investigation of his/her case by the CTP and shall be notified of the results of such internal investigation.
3. In case of intentional false accusation of another CTP Staff of discrimination or harassment this shall be considered a breach of the CTP Staff's work duties and can lead to termination of his/her labour-law relationship in accordance with the relevant provisions of respective Labour Code and if appropriate, to civil or criminal liability of that CTP Staff.

## **8 LEGAL PROTECTION AGAINST DISCRIMINATION**

1. In case of discrimination, the CTP Staff is entitled to request in court proceedings that CTP should refrain from discrimination, remove negative consequences of discrimination, and provide adequate satisfaction.
2. If CTP's remedial action under para 1 is not considered sufficient as for example, the CTP Staff's reputation or dignity or respect in society has been substantially decreased, the CTP

Staff has also the right to claim monetary compensation of nonmaterial damage. The amount of the compensation shall be determined by the court taking into account seriousness of the caused damaged and circumstances of discriminatory action.

## **9 PROTECTION AGAINST REPRISALS**

CTP will take all appropriate measures to minimize the risk of any victimization or reprisals against the complainant or the alleged offender. It shall ensure that all staff, including management and supervisory staff, are informed that CTP will not tolerate victimization or reprisals. If management becomes aware of victimization or reprisal or threats of such in the workplace as a result of a complaint lodged, appropriate support services shall be made available to the complainant. Disciplinary action shall be taken in accordance with the CTP's usual procedures for breach of CTP's policy. If management becomes aware of victimization or reprisal or threats of such outside the workplace, appropriate support services shall be made available to the complainant and, where appropriate, the act or threat may be reported to the police.

## **10 FINAL PROVISIONS**

1. The Policy comes into force on February 2, 2022.
2. All changes or amendments to the Policy must be made by CTP in writing and must be promulgated in an appropriate manner.
3. CTP is obliged to acquaint the CTP Staff with the issue, change (amendment) or cancellation of the Policy within 15 days. New CTP Staff have to be acquainted with the Policy upon the commencement of work.
4. The Policy is accessible to all CTP Staff on the CTP's intranet and in the CTP's HR department.

Prague, 2 February 2022

CTP Group: Richard John Wilkinson, Executive

# ANNEX 1: GROUP GRIEVANCE INVESTIGATION PROCEDURE



<b>STEP 1:</b>  <b>INFORMAL DISCUSSION</b>	<ul style="list-style-type: none"> <li>• CTP Staff is encouraged to use informal methods of resolving disagreements or disputes. If CTP Staff have a reasonable grievance or complaint regarding the workplace or the way they have been treated at work, they should, where possible, start by discussing it with their manager. It may be possible to agree to a solution informally between worker and manager.</li> <li>• Every effort should be made by both management and workers to resolve complaints, grievances, and disputes at the earliest possible opportunity and with the minimum opportunity for tension or conflict.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Informal arrangements</b> – and friendly resolution – are always preferable; however, this first step should not be made a pre-requisite for commencing a formal complaint.</li> <li>• <b>Confidentiality:</b> Where direct line supervisor is subject of complaint, informal communication with this supervisor is neither desirable nor effective. In these cases a CTP Staff needs to be able to speak with other parts of management.</li> </ul>	
<b>STEP 2:</b>  <b>FORMAL GRIEVANCE</b>	<ul style="list-style-type: none"> <li>• If the CTP Staff wishes to raise the matter formally, she/he should set out the grievance in writing to their manager, or through the Group AML &amp; Compliance Officer or using the Grievance channel available on intranet. This submission should be factual in nature and avoid language that is insulting or abusive.</li> <li>• Where the grievance is against the CTP Staff's manager and the CTP Staff is uncomfortable approaching him/ her, the CTP Staff should address the grievance to another manager or the HR department.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Individual and collective grievances:</b> Collective grievances and disputes should be handled using the same approach as that for individual complaints and grievances.</li> <li>• <b>Non-retribution:</b> The procedure guarantees that any CTP staff raising a complaint will not be subject to any reprisal.</li> <li>• <b>Sensitivity to vulnerable staff:</b> CTP Staff that may feel particularly vulnerable (e.g. women, ethnic/religious minorities, migrant workers, younger workers, employees with disabilities) should not be deterred from lodging a grievance. Therefore, the process for lodging grievances is discreet to allow CTP Staff to make a complaint without anyone else knowing. The anonymous Grievance channel available on intranet is the best tool.</li> </ul>	

- **Right to anonymity:** CTP Procedures and Grievance channel provides CTP Staff with the option to file grievances anonymously, including against their direct supervisor if the CTP Staff wishes to make a complaint against them.
- **Recordkeeping** ensured by Group AML & Compliance Officer is part of addressing CTP Staff grievances.

**STEP 3:  
GRIEVANCE  
HEARING**

- Group AML & Compliance Officer will call the CTP Staff to a meeting within 5 working days after receiving the complaint to discuss the CTP Staff's grievance.
- Pending national legislation and any applicable collective agreement, the CTP Staff should have the right to be accompanied by a colleague at this meeting if he/she makes a reasonable request.
- After the meeting, the Group AML & Compliance Officer will give the CTP Staff a decision in writing within 1 month.

**STEP 4:  
APPEAL**

- If the CTP Staff wishes to appeal the decision, he/she should notify the Group AML & Compliance Officer. The CTP Staff will be invited to an appeal meeting within 5 working days and the appeal will be heard by a more senior manager (Deputy CEO and Group CFO).
- The CTP Staff will normally have the right to be accompanied by a colleague at this meeting if s/he makes a reasonable request. Every effort should be made to secure a resolution in the best interests of the CTP Staff and the company. After the meeting the senior manager/Group AML & Compliance Officer will give the CTP Staff a decision in writing.
- This decision is final within the terms of the company's internal grievance mechanism. However, in some legal systems the CTP Staff or their chosen representative may refer the complaint or grievance to the labour ministry/inspectorate (or other appropriate administrative body) for resolution and/or redress, as specified in national law. For example, the CTP Staff have a right to revert to judicial or administrative channels (employment tribunal, labour court, labour inspectorate).