

Anti-harassment Policy

Purpose

The Anti-harassment Policy expresses the commitment of Ooredoo Group to maintain a workplace that is free of harassment and violence, so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating, or sabotaging others in our workplace. We also prohibit willful discrimination based on age, ethnicity, racial, religion or disability. Ooredoo Group ensures access to a secure and confidential channel to report any unethical behavior without fear of retaliation. This Policy is further reinforced by a detailed Investigation Policy, providing clear guidelines to ensure a consistent, fair, and impartial investigation process.

Scope

This workplace Anti-harassment Policy applies to all employees, public visitors, customers, and anyone else whom employees come into contact with at work.

Guidelines

Definition

Harassment is unwanted physical, verbal, or non-verbal conduct, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It includes harassment based on grounds such as age, disability, race, ethnic origin, physical attributes, religion, belief or gender. The defining factors for deciding whether conduct has this effect are whether the relevant behavior (i) is unacceptable to the recipient and (ii) could reasonably be considered to amount to harassment.

Harassment includes - but is not limited to - words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle or cause personal humiliation or embarrassment to another; or that cause an intimidating, hostile or offensive work environment.

Bullying is offensive, intimidating, malicious or insulting behavior, involving the abuse or misuse of power through means that can undermine, humiliate, denigrate or injure the recipient. Bullying can take the form of physical, verbal or non-verbal conduct or coercion through fear or intimidation.

Both harassment and bullying may be carried out by an individual against an individual or involve groups of people. It may be obvious or insidious conduct, and it may occur face-to-face or more indirectly. Whatever form the conduct takes, it is unwarranted and unwelcome to the recipient.

- Behavior generally accepted as amounting to harassment in the workplace includes, but is not limited to:
 - a) Spreading malicious rumors, gossip, or slander;
 - b) Deliberate exclusion or isolation from normal workplace conversations or activities;
 - c) Unwelcome sexual advances or suggestive behavior (even those which the harasser may perceive as harmless);

- d) Offensive or intimidating comments, emails, text messages, or social media content;
- e) The display of pictures, objects, or written materials that may be considered offensive to particular ethnic or religious groups;
- f) Insensitive jokes, pranks or language, including mocking, mimicking or belittling a person or their disability;
- g) Unwanted physical contact ranging from touching to serious assault;
- h) Being treated less favorably than colleagues (unfair treatment);
- i) Intrusive behavior including pestering, spying or stalking;
- j) Intimidating, coercive or threatening actions and behavior;
- k) Humiliating someone in front of others; and
- l) Purposely withholding work-related information preventing the employees from achieving their professional objectives.
- Bullying in the workplace may include, but is not limited to:
 - a) Physical or psychological threats;
 - b) Overbearing and intimidating levels of supervision;
 - c) Inappropriate or derogatory remarks about someone's performance;
 - d) Persistent negative and unjustified comments or criticism;
 - e) Spontaneous rages, often over trivial matters;
 - f) Shouting or swearing at people in public or in private;
 - g) Setting up individuals to fail by imposing impossible deadlines;
 - h) Continuously and unreasonably belittling someone's opinion.

This list is not exhaustive.

Sexual harassment is illegal, and relevant reports will be investigated accordingly. If an employee is found guilty of sexual harassment, they will be terminated and will be reported to law enforcement or relevant authorities as well.

Addressing harassment

If you're being harassed, whether by a colleague, customer, or vendor, you can choose to talk to any of these people:

- **Offenders:** If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.) Avoid using this approach with customers or stakeholders.
- **Your line manager:** If customers, stakeholders, or team members are involved in your claim, you may reach out to your line manager. Your line manager will assess the situation and may contact HR if appropriate.

- **Your HR:** Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment (e.g. sexual advances) or if your line manager is involved in your claim.

Investigation Process for Harassment Complaints

The goal is to reassure employees that their concerns will be handled impartially and to protect the company from claims of bias. To ensure a fair, transparent, and unbiased process in addressing harassment complaints, the following steps will be followed:

- **Step 1: Acknowledgement of Complaint:** Upon receiving a harassment complaint, the Human Resources (HR) department will acknowledge receipt of the complaint and ensure it is treated with confidentiality and sensitivity.
- **Step 2: Initial Assessment:** HR will assess the nature of the complaint to determine its severity and urgency. If necessary, the complaint will be escalated for further review.
- **Step 3: Investigator Assignment:** A neutral investigator or a team of HR representatives will be assigned to handle the investigation to ensure impartiality and fairness.
- **Step 4: Interviews and Evidence Collection:** HR will conduct interviews with the complainant, the accused and any potential witnesses. Relevant documents, communications or other evidence will be reviewed.
- **Step 5: Communication with the Complainant and Accused:** Both the complainant and the accused will be informed of the process, the timeline for the investigation, and their rights throughout the investigation.
- **Step 6: Investigation Outcome:** Once the investigation is complete, HR will communicate the outcome to both parties and appropriate disciplinary actions will be determined based on the findings.
- **Step 7: Action on Retaliation:** Any retaliation against an employee for filing a complaint or participating in the investigation will not be tolerated. Retaliation will result in further disciplinary action.
- **Step 8: Confidentiality Assurance:** Throughout the process, all information regarding the complaint will be kept confidential and shared only with those who need to know for the purpose of the investigation.

This clear, step-by-step process ensures a fair, unbiased, and thorough investigation, while also protecting both the complainant and the company from potential claims of bias.

Alerting about harassment

Encouraging employees to speak up and alert management about any concerning issues they notice is crucial to maintaining a safe and respectful workplace environment. Ooredoo Group values the contributions of each team member and recognizes that their insights are instrumental in ensuring our workplace remains free from harassment, discrimination, or any form of misconduct.

Confidentiality

Any information the employee discloses regarding harassment will be handled with the utmost confidentiality. Ooredoo Group follows strict procedures to safeguard any information, and disclosures will only be made on a need-to-know basis to investigate and address the situation effectively.

Disciplinary consequences

Action taken for harassment depends on the severity of the offence and may include counselling, reprimands, suspensions, or termination.

Cultural considerations will also be taken into account when assessing the nature and impact of the offence.

However, zero tolerance will be applied to any harassment that conflicts with the values of respect, modesty, and dignity, especially cases of sexual harassment or behavior that undermines cultural norms.