

# **DWP\_(5)-14 Dworkin® Anti Bullying and Harassment Policy**

**Dworkin® ISO 9001: 2015 Documentation**

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## Contents

1.	Introduction .....	3
2.	Prohibited Conduct Under This Policy .....	4
2.1	Discrimination .....	4
2.2	Harassment .....	4
	Verbal harassment.....	4
	Non-verbal harassment.....	4
2.3	Sexual harassment .....	4
	Verbal sexual harassment .....	5
	Nonverbal sexual harassment.....	5
	Physical sexual harassment.....	5
2.4	Consensual Romantic or Sexual Relationships.....	5
2.5	Retaliation .....	6
3.	Confidentiality .....	7
4.	Complaints procedure .....	8
4.1	Alternative legal remedies .....	8
5.	Bullying.....	9
6.	Table of Ammendments.....	11

## 1. Introduction

Dworkin® strives to create and maintain a working environment in which people are treated with dignity, decency and respect. The environment of the company should be characterised by mutual trust and the absence of intimidation, oppression and exploitation. Dworkin® will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Dworkin® will seek to prevent, correct and discipline behavior that violates this policy.

All our employees, regardless of their position, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or even termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment or retaliation, including the failure to immediately report such misconduct to human resources (HR) Miss Lucie Mahelova, are in violation of this policy and could be subject to discipline.

If at any time any of our employees feel uncomfortable or are simply unsure as to whether something should be reported, please contact HR (Lucie Mahelova) as soon as possible. Please do not stay silent, it is important for the well being of everyone that issues are resolved as quickly as possible.

## 2. Prohibited Conduct Under This Policy

Dworkin®, in compliance with state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

### 2.1 Discrimination

It is a violation of Dworkin®'s policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of state and local laws, and also the various acts from various countries that cover discrimination of any kind. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws and acts.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

### 2.2 Harassment

Dworkin® prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of Dworkin® whether employee or contractor.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

**VERBAL HARASSMENT** includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.

**NON-VERBAL HARASSMENT** includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status.

### 2.3 Sexual harassment

Sexual harassment is a form of unlawful employment discrimination and is prohibited under Dworkin®'s anti-harassment policy. According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment
- Is used as a basis for an employment decision
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

**VERBAL SEXUAL HARASSMENT** includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.

**NONVERBAL SEXUAL HARASSMENT** includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.

**PHYSICAL SEXUAL HARASSMENT** includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

## **2.4 Consensual Romantic or Sexual Relationships**

Dworkin® discourages romantic or sexual relationships between a manager or other supervisory employee and an employee who reports directly or indirectly to that person, because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others, or at a later date by the staff member, as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment.

If any employee of Dworkin® enters into a consensual relationship that is romantic or sexual in nature with an employee who reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the HR director Miss Lucie Davidova. Because of potential issues regarding quid pro quo harassment, Dworkin®, has made reporting mandatory. This requirement does not apply to employees who do not work in the same country or to parties where neither one supervises or otherwise manages responsibilities over the other.

Once the relationship is made known to Dworkin® the company will review the situation with human resources in light of all the facts (reporting relationship between the parties, effect on co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the HR director and senior management will decide which party will be moved. That decision will be based on which move will be least disruptive to the organisation as a whole. If no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

## 2.5 Retaliation

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment
- Appearing as a witness in the investigation of a complaint
- Serving as an investigator of a complaint

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

### **3. Confidentiality**

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR director will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files only within the HR department.

## 4. Complaints procedure

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

- Complaints should be submitted as soon as possible after an incident has occurred, preferably in writing to HR. The HR director may assist the complainant in completing a written statement or, in the event an employee refuses to provide information in writing, the HR director will dictate the verbal complaint
- Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the HR director will notify senior management and review the complaint with the CEO
- The HR director will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred
- If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave
- During the investigation, the HR director, together with other management employees, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred

Upon conclusion of an investigation, the HR director or other person conducting the investigation will submit a written report of his or her findings to the company. If it is determined that a violation of this policy has occurred, the HR director will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:

- a) the severity, frequency and pervasiveness of the conduct;
- b) prior complaints made by the complainant;
- c) prior complaints made against the respondent; and
- d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).

If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the HR director may recommend appropriate preventive action.

Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the HR director and other management staff as appropriate, and decide what action, if any, will be taken.

Once a final decision is made by senior management, the HR director will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

### 4.1 Alternative legal remedies

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local or state agencies or the courts.



## 5. Bullying

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that Dworkin® will not in any instance tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

### Definition

Dworkin® defines bullying as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating or intimidating behaviors
- Work interference/sabotage that prevents work from getting done
- Verbal abuse

Such behavior violates Dworkin®'s Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

Some examples to consider (The following examples are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy)

Dworkin® considers the following types of behavior examples of bullying:

- Verbal bullying. Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks
- Physical bullying. Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property
- Gesture bullying. Nonverbal gestures that can convey threatening messages
- Exclusion. Socially or physically excluding or disregarding a person in work-related activities
- Cyberbullying (the sending of emails that are of a menacing nature)

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person
- Shouting or raising one's voice at an individual in public or in private
- Using obscene or intimidating gestures
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting)
- Personal insults and use of offensive nicknames
- Public humiliation in any form
- Constant criticism on matters unrelated or minimally related to the person's job performance or description
- Public reprimands
- Repeatedly accusing someone of errors that cannot be documented

- Deliberately interfering with mail and other communications
- Spreading rumors and gossip regarding individuals
- Encouraging others to disregard a supervisor's instructions
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- Assigning menial tasks not in keeping with the normal responsibilities of the job
- Taking credit for another person's ideas
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property)

Individuals who feel they have experienced bullying should report this to their supervisor or to Human Resources before the conduct becomes severe or pervasive. All employees are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow Dworkin® to take appropriate action.

## 6. Table of Ammendments

Name of Amender	What was Amended	Date of Amendment
Michael WILLIAMSON	Change of entire document to new Dworkin® font design	14.01.2020
Michael WILLIAMSON	Checked document for viability	14.01.2020
Michael WILLIAMSON	Checked document for viability	18.01.2021
Michael WILLIAMSON	Checked document for viability	12.08.2022
Michael WILLIAMSON	Checked document for validity and viability	26.01.2023
Michael WILLIAMSON Martin KRIVY	Checked document for validity and viability	03.01.2024
Michael WILLIAMSON	Changes made to front cover	27.02.2025