

First publication: February 2022
Version: 1
Document type: Policy
Scope: Global



DONCASTERS

GLOBAL ANTI-HARRASSMENT POLICY

POLICY NAME
Global Anti-Harassment Policy
PURPOSE
This Policy supports Doncasters’ commitment to zero-tolerance on all types of harassment.
OBJECTIVES
The objective of this Policy is to define Doncasters’ position on harassment.
This Policy is a global minimum standard.
Where local legislations define higher standards, Doncasters entities will comply with them.
As set forth in our Code of Conduct, Doncasters complies with local laws in every country where it operates.
AUDIENCE
The policy applies to all companies within the Doncasters Group, including all operating companies under the operational control of Alloy Topco Limited.
In the following document a Doncasters Group entity is referred to as “Doncasters” or “the Company” interchangeably.
Doncasters is committed to ensuring that its stakeholders, including but not limited to its suppliers, consultants, and advisors, uphold the principles set out in this policy and adopt similar policies within their operations.
INCLUDED IN THIS POLICY IS....
<ol style="list-style-type: none"> 1. Definitions 2. Roles and Responsibilities 3. Reporting Mechanism & Complaint Procedure 4. Confidentiality & Protection Against Retaliation
CONFIDENTIALITY STATUS
Public
LOCAL ADAPTATION AUTHORISATION
Yes, if more restrictive

DOCUMENT OWNER
Legal, Compliance & Risk
DOCUMENT REVIEWER
Executive
DOCUMENT APPROVER
Board of Directors
INTRODUCTION
<p><i>“We believe that diversity is an essential ingredient in a workplace culture that supports innovation and high performance”</i></p> <p style="text-align: right;"><i>Mike Quinn, CEO</i></p>
<p>Doncasters is committed to respecting and promoting the highest standards of ethical behaviour in line with our Code of Conduct and our Values.</p> <p>Diversity and Inclusion is at the heart of everything we stand for and applies to all people irrespective of where they live or who they are. We want our people to feel uniquely valued and safe to contribute their best.</p> <p>By creating an environment where diversity flourishes and people can be themselves, we will generate greater engagement, performance, and innovation.</p> <p>All people we do business with, including but not limited to our employees, are entitled to respectful treatment and to be free from the demoralising effects of harassment or unwelcome, offensive, or improper conduct.</p> <p>We expect any place from which we work to be free from harassment, victimisation, and inappropriate behaviour of any kind.</p> <p>No Doncasters employee shall be subjected to harassment, victimisation or retaliation based on – including but not limited to – race, sex, national origin, religion, political opinion, age, medical status, disability, gender, marital status, pregnancy, sexual orientation, or gender identity but we are convinced that a respectful workplace is more than compliance with the law, and any form of harassment will not be tolerated.</p>

DEFINITIONS	
Harassment	<p>Harassment is defined as any offensive, inappropriate, unwelcome, or even inadvertent behaviours that has the effect of hurting, offending, or upsetting another employee, that sets up an employee to make a mistake, that humiliates or intimidates an employee (“bullying”) or that entails physical or social isolation (“silent treatment”) of an employee. It typically involves the misuse of power; considering that “power” does not always mean being in a position of authority but can include either personal strength or power to coerce through fear or intimidation. This offensive behaviour negatively affects the dignity, psychological or physical integrity of the targeted employee and results in a negative workplace. It may be related but not limited to race, sex, national origin, religion, political opinion, age, medical status, disability, gender, marital status, pregnancy, sexual orientation, or gender identity. Either a repeated but also a one-off incident of serious behaviour can constitute harassment if this behaviour is detrimental and results in any adverse effects for the employee. The Company prohibits any conduct which contributes to an intimidating or offensive workplace and/or interferes with a person’s ability to perform their job.</p>
	<p>Harassment can take on various forms such as:</p> <ul style="list-style-type: none"> • Threats, blackmail, coercion • Sabotage of work • Abusive language, verbal or written • Abuse of authority or power • Giving an individual the “silent” treatment, refusing to include an individual in work related activities • Resistance to complying with reasonable requests preventing an individual from completing assigned tasks
Sexual Harassment	<p>Sexual harassment means unwelcome sexual conduct (such as physical, visual, verbal, or written) which affects an individual’s dignity and creates an intimidating, hostile or uncomfortable working environment.</p>

	<p>Sexual harassment can take on various forms such as:</p> <ul style="list-style-type: none"> • Verbal manifestations: words, advances, propositions, or requests for sexual favours. • Written manifestations: sending any type of written communication, including emails or text messages, with unwelcome or offensive sexual requests, inquiries, or advances. • Visual manifestations: leering, making sexual gestures, displaying offensive sexually suggestive objects or pictures, such as calendars, cartoons, or posters, subtle or explicit demands for sexual favours. • Physical manifestations: unsolicited or unwelcomed actions including touching or assault.
Employee	<p>‘Employee’ shall mean and include any person on the active payroll of the Company including managers and workers, those on deputation, contract, temporary, part time, apprentices, trainees or working as consultants.</p>
Workplace	<p>Doncasters global anti-harassment policy defines “workplace” as anywhere where Doncasters employees are conducting business on the Company’s behalf.</p>
	<p>This includes, but is not limited to:</p> <ul style="list-style-type: none"> • conducting business in person on Doncasters premises, • on the phone, • virtually, • through email or other social media and/or • during after-hours events such as, but not limited to, business meetings, dinners, trainings, and during work-related travel.

ROLES & RESPONSIBILITIES

Employees' role and responsibilities

Every employee is expected to treat others with respect and ensure that their own behaviour does not cause offence or give rise to misunderstandings. It is every employee's responsibility to do their best to ensure a positive workplace and build inclusive teams.

Employees are encouraged to advise others of behaviour that is unwelcome or offensive. Often, some behaviours are not intentional. While this does not make it acceptable, advising the offender of inappropriate behaviour gives the offender the opportunity to modify or stop their offensive behaviour.

An employee who believes that they have been harassed should file a complaint and obtain a review of their complaint through the complaint process [established in accordance with this Policy].

They will be:

- Kept informed throughout the process, subject to applicable legislation;
- Protected against retaliation.

Managers' role and responsibilities

Managers must ensure to provide a safe working environment for their team members. This should be achieved by:

- Building inclusive teams by treating everyone with respect and trust;
- Putting an end to any harassment they are aware of, whether there is a complaint or not;
- Reporting immediately to a Human Resources representative when made aware of conduct inconsistent with this Policy;
- Ensuring their team members are not retaliated against for a prior complaint.

Failing to take corrective measures with regards to any behaviour violating this Policy that managers are aware of may result in appropriate disciplinary sanctions, up to and including termination, being imposed upon themselves as well as the offender.

Witnesses' role and responsibilities

It is the responsibility of all employees to ensure they respect the right of their fellow employees to work in a workplace free of any harassment.

Any person who believes that they have witnessed a violation of this Policy, or who becomes aware of conduct that may violate this Policy, should immediately report it through the complaint mechanism of the Company.

Any employee who knew about the harassment but took no action to report it may also be subject to disciplinary sanctions, up to and including termination.

REPORTING MECHANISMS & COMPLAINT PROCEDURE

Reporting to Management

If any employee believes they have been or are being subjected to conduct that violates this Policy, they should bring it to the attention of their manager.

Reporting to HR

If the Employee does not feel comfortable raising the issue to their manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, they should report the matter to their Human Resources representative.

Report through Speak Up

Employees can also report violations of this Policy via the Speak Up service. The Speak Up service is run by a company called Navex and is an external, independent reporting service designed for employees and others to report anonymously any violation of Law, our Code of Conduct, Corporate Values and related policies or directives, including this one, while complying with local regulations.

Details of the contact details can be found in our Code of Conduct, on posters around each site, on the Employee App and on SharePoint.

<p>REPORT ONLINE</p> <p>www.doncasters.ethicspoint.com</p>	<p>REPORT BY PHONE</p> <p>From the UK: Call: 0800 890 011 (when prompted, dial: 833 537 0829)</p> <p>From the USA: Call: 833-537-0829</p> <p>From Germany: Call: 0800 225 5288 (when prompted, dial: 833 537 0829)</p> <p>From India: Call: 000 800 050 3406</p> <p>From Mexico: For outside calls, dial your local access code followed by 800-288-2872. Por Cobrar Spanish: 800-112-2020 (when prompted, dial: 833 537 0829)</p> <p>From China: For an outside line, dial the direct access number for your location: China (Southern): 10-811 China (Northern): 108-888 (when prompted, dial: 833 537 0829)</p>
<p>CONFIDENTIALITY & PROTECTION AGAINST RETALIATION</p>	
<p>Doncasters strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith, or otherwise abusive reports (such as false personal attacks aimed at specific individuals) are prohibited and may result in disciplinary action.</p>	