

# Anti-discrimination & harassment policy

## Introduction

Our anti-discrimination and harassment policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. We do not tolerate any kind of discrimination or harassment. This policy supports our overall commitment to create an inclusive and welcoming workplace for all employees and other stakeholders that we meet in our daily operations.

## Scope

This policy applies to all employees, contractors, visitors, customers and stakeholders.

Discrimination and harassment are any negative actions or attitudes directed toward someone or a group of people because of the prohibited grounds for discrimination. Prohibited grounds of discrimination as defined by ILO Article no. 111 and additions by MTG:

- Race/color
- Gender identity or expression / sexual orientation
- Age
- Disability / medical history
- Ethnicity/nationality/Social origin
- Religion / Political opinion
- Marriage / civil partnership
- Pregnancy / maternity/ paternity

## What is considered discrimination?

This is not an exhaustive list, but here are some instances that we consider discriminatory:

- Hiring managers disproportionately, disqualify male, female or non-binary job candidates on purpose
- Managers bypass team members with specific protected characteristics (e.g., race) for promotion without being able to formally prove (e.g., with documentation) the reasons other employees were selected instead
- Employees sending emails that may be offensive to someone's ethnic origin

## What is considered harassment?

Harassment, verbal or nonverbal, includes bullying, intimidation, direct insults, malicious gossip, victimization and other unwelcomed conduct based on the prohibited grounds for discrimination. We cannot create an exhaustive list, but here are some instances that we consider harassment:

- Sabotaging someone's work on purpose
- Engaging in frequent or unwanted advances of any nature
- Commenting derogatorily on a person's ethnic heritage or religious beliefs
- Starting or spreading rumors about a person's personal life
- Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g., bringing coffee) against their will

## What is considered sexual harassment?

Sexual harassment is unwelcome conduct of a sexual nature that is persistent or offensive and interferes with an employee's job performance or creates an intimidating, hostile or offensive work environment.

Though sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include the following:

- Physical assaults of a sexual nature, such as rape, sexual battery, molestation or attempts to commit these assaults, and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body.
- Unwelcome sexual advances, propositions or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes, or comments about a person's sexuality or sexual experience.
- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward.
- Subjecting, or threats of subjecting, an employee to unwelcome sexual attention or conduct or intentionally making the performance of the employee's job more difficult because of that employee's sex.
- Sexual or discriminatory displays or communications on any channels.
- Retaliation for sexual harassment complaints.

## Actions to prevent discrimination

To ensure that our conduct and processes are fair and lawful, we:

- Use inclusive language in job ads and include equal opportunity employer statements
- Set formal job-related criteria to hire, promote and reward team members
- Offer compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics
- Accommodate people with disabilities
- Require managers to keep detailed records of their decisions concerning their team members and job candidates

## What to do in cases of discrimination or harassment

If you are the victim of discriminatory behavior (or if you suspect that others are being discriminated against,) or harassment, please talk to your local HR (or your manager, or managers manager) as soon as possible. They are responsible for hearing your claim, investigating the issue and determining punishment.

In case you want to report anonymously you can do so via your internal whistleblower channel or you can report to MTG's whistleblower channel: <https://whistleblowersoftware.com/secure/MTG>.

## How we address discrimination & harassment complaints

Our local HR teams are proactive and responsive about determining whether discrimination or harassment occurs. For example, we:

- Look into similar claims about the same person or process to determine if discrimination or harassment is systemic
- Track metrics and look into data that give us some insight on people’s behaviors (e.g. percentage of job applicants of a certain race a hiring manager disqualifies.)
- Evaluate testimonies on social media that visitors, job candidates or former employees have made
- Conduct discreet interviews and gather information

We will investigate all claims discreetly. We will never disclose who made a complaint to anyone or give out information that may help others identify that person (e.g., which department or role they work in.).

We should all strive to prevent and address discrimination and harassment. Be aware of your implicit biases and speak up whenever you or your colleagues are discriminated against. If you have any ideas on how we can ensure fairness and equality in our workplace, we are happy to hear them.

We will not retaliate against anyone who is making honest claims of discrimination or harassment.

## Disciplinary consequences

Punishment for discriminatory behavior or harassment depends on the severity of the offense. For example, inadvertently offending someone might call for a reprimand. Conversely, willfully bypassing employees for promotion because of a protected characteristic will result in termination.

We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to find and overcome. In case we conclude that an employee unconsciously discriminates, we will support them through training and counseling and implement processes that mitigate biases. But, if this person shows an unwillingness to change their behavior, we may demote or terminate them.

We will not be lenient in cases of assault, sexual harassment, or workplace violence, whether physical or psychological. Sexual harassment is illegal, and we will seriously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated. The same reasoning applies to assault and workplace violence.

Employees who harass their colleagues will go through our disciplinary process and we may reprimand, demote, or terminate them depending on the severity of their offence.

## Policy history and change information

Version	Revision Date	Change information
1	2021-02-11	Final draft of policy
1.1	2021-12-08	Minor editorial changes
1.2	2022-12-08	Editorial changes and clarifications