

# **Anti-discrimination and anti-mobbing policy at Vitrintec Sp. z o.o.**





In accordance with the applicable anti-discrimination law and anti- mobbing regulations in force at Vitrintec Sp. z o.o., the Management of the company commits itself to effectively counteract any form of discrimination and mobbing and to effectively resolve any problems of unequal treatment or harassment in the workplace that have already occurred.

## 1. Purpose and scope of the Policy

**1.1** The purpose of this Policy is to set out the principles for counteracting mobbing and discrimination practices at Vitrintec Sp. z o.o. in order to create a friendly and safe working environment that ensures that all employees and business partners are treated with dignity and equality. The aim is also to implement principles and solutions that will contribute to the prevention of inappropriate behaviour in an effective and efficient manner.

**1.2** The Policy describes:

- the definition of discriminatory and mobbing behaviour;
- the prevention of incidents of mobbing and discrimination in the workplace;
- the procedures to be followed in cases of discrimination or mobbing;
- the form in which an employee should report incidents;
- the reporting procedure;
- the consequences for a person violating the applicable regulations.

**1.3** All employees employed by the company are obliged to read and strictly adhere to the content of this Policy.

## 2. Definitions and forms of violations

**2.1.** Mobbing means actions or behaviours concerning or directed against an employee that consist of persistent and prolonged harassment or intimidation. Mobbing occurs when these actions or behaviours cause an employee to underestimate his or her professional suitability, cause or aim to humiliate or embarrass him or her, or isolate or eliminate him or her from his or her team of co-workers. Persistence and duration means that the actions or behaviours undertaken are of a recurring, repeated, systematic nature.

### Mobbing can be in a passive form.

There are no defined categories of conduct that may be interpreted as bullying. Each mobber acts in an individual way and may undertake bullying in an unprecedented form. Mobbing may also consist of a combination of different behaviours by the mobber.

**More:** Labour Code (Art. 94. Employer's duty to prevent mobbing).



**2.2** Actions and behaviours that fulfil the characteristics of mobbing are, individually or in combination, in particular:

- limiting or obstructing the opportunity to speak, constant interruption of speech;
- verbal aggression, i.e. shouting, insults, intimidation, humiliation;
- attacks relating to the professional or private sphere, i.e. questioning of confidence, ridicule, mocking;
- aggression expressed by non-verbal means, e.g. humiliating and provocative gestures;
- withdrawal or questioning of decision-making authority, unreasonable withdrawal of tasks, excessive control and unconstructive criticism;
- assignments that are incompatible with each other, inadequate for the competencies possessed, undermining one's dignity;
- hindering or denying access to resources and materials needed to perform duties or deliberately placing them in a physically remote or isolated location;
- false assessment of commitment to work, quality of work and professional competence;
- isolation, unjustified avoidance of contact, exclusion from the group, failure or blocking of opportunities to talk to the employee, keeping relevant information hidden;
- seeking to eliminate the employee from the group.

**2.3.** Discrimination is the unequal treatment of employees with regard to the establishment and termination of their employment relationship, terms and conditions of employment, promotion and access to training for the development of their professional qualifications, and in particular without regard to their sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination or sexual orientation, as well as whether they are employed for a definite or indefinite term or on a full-time or part-time basis.

**Więcej:** Kodeks pracy (Art. 18(3a)). - [Zakaz dyskryminacji – definicje].







**2.4. Actions and behaviour that meet the criteria of discrimination are:**

- unfavourable shaping of remuneration for work or other conditions of employment;
- omission in promotion or granting of other work-related benefits;
- limited access to training for the development of professional qualifications;

**2.5.** Behaviour with the characteristics described under 2.2, relating directly or indirectly to conditions of employment, promotion and access to training to improve professional qualifications, in particular on the basis of gender, age, disability, race, religion, nationality, political opinion, union membership, ethnic origin, religion, sexual orientation, and also on the basis of type of employment and working hours, can also be regarded as mobbing.

**2.6.** Reasonable, rational and constructive information, including critical remarks, about an employee's actions or behaviour, or reasonable instructions given to an employee in the course of his/her work, do not constitute mobbing.



### 3. General rules of conduct

- 3.1.** At Vitrintec Sp. z o.o., discriminatory actions, mobbing or other actions that violate the dignity and respect of another person are not accepted.
- 3.2.** Absolutely prohibited are any actions or behaviour which assessed in terms of the Labour Code may be considered discriminatory or harassing.
- 3.3.** It is forbidden to take advantage of a privileged professional position in an unjustified manner and in violation of the law.
- 3.4.** All employees are obliged to react to any perceived discrimination or mobbing.
- 3.5.** Discriminatory behaviour and mobbing are illegal and contrary to the company's internal regulations, such as: Vitrintec Sp. z o.o. Code of Ethics and Business Conduct.

### 4. Prevention and counteracting of discrimination and mobbing in the workplace

- 4.1.** Employer's responsibilities
  - The relationship between employees and the employer should be compliant with the obligations deriving from labour legislation and with respect for personal dignity and tolerance towards the employee;
  - The employer does not tolerate sexual, physical or psychological harassment of employees or the use of offensive language;
  - The employer makes his/her decisions concerning employees, in particular with regard to employment, promotion, referral to qualification training and the formation of remuneration, based on an objective assessment of their work performance, skills and competencies and professional experience;
  - The employee evaluation criteria are formulated in a clear and verifiable manner;
  - The employer does not discriminate employees due to their race, religion, nationality, skin colour, age, gender, marital status, sexual orientation, ethnic origin; disability, political beliefs, union membership, as well as due to the type of employment and working hours;
  - The employer shall take preventive measures to eliminate and reveal inappropriate behaviour at an early stage;
  - The employer takes measures to raise awareness of the norms and ethics of the function prevailing at Vitrintec Sp. z o.o. among his/her employees;
  - The employer is committed to providing support to employees who are exposed to any disrespectful behaviour from co-workers or business partners.

- 4.2.** The employer implements his/her obligation to prevent mobbing and discrimination in particular by:
  - Introducing methods and mechanisms aimed at revealing and eliminating unacceptable forms of behaviour;
  - Monitoring the number of reported incidents of unacceptable behaviour;
  - Reacting in any case of suspected discrimination or mobbing, regardless of the source of the information;
  - Taking the measures provided for by the law to remove the effects of discrimination and mobbing, in particular assisting the victims of inappropriate behaviour.
- 4.3.** The employer implements all actions using the available sanction measures against persons perpetrating discrimination and mobbing.
- 4.4.** The heads of departments are responsible for implementing the tasks to prevent and counteract discrimination and mobbing.
- 4.5.** Employee's responsibilities:
  - The employee is obliged to treat other employees and co-workers equally;
  - All disputes and conflicts must be resolved without prejudice to the personal dignity of the parties to the conflict;
  - It is unacceptable for an employee to use his/her privileges and information obtained in the course of work for purposes other than those for which they were provided;
  - Any employee who is a victim of discrimination or harassment, or an employee who witnesses such behaviour, is obliged to report the incident.

### 5. Rules of conduct in cases of discrimination or mobbing

- 5.1.** If an employee exercises his or her rights to report a violation of the principle of equal treatment in the workplace, this shall not be the basis for unfavourable treatment of the employee and shall not result in any negative consequences against the employee.
- 5.2.** Discrimination or mobbing can be reported in the form of a complaint in accordance with the Whistleblowing and Handling Procedure described below.

**5.3.** A complaint can be reported anonymously or openly using the following channels:

- e-mail addressed to: [zaufanie.vitrintec@gmail.com](mailto:zaufanie.vitrintec@gmail.com);
- to the designated person.

**5.4.** The report should include:

- a) a description of the situation that has occurred
- b) an indication of evidence and/or witnesses to the incident (if possible)
- c) identification of the perpetrator(s)
- d) the date of the report

**5.5.** In the case of reports made in person, upon receipt of the report, the reporting person will be asked to sign the report to confirm the information provided.

**5.6.** The process of handling and clarifying the circumstances described in the report is conducted in accordance with the above Procedure and should include:

- hearing the view of the reporting employee;
- hearing the view of the employee identified as the perpetrator in the report, examining any evidence and hearing from witnesses;
- investigating to verify the information obtained during interviews with the employees.

**5.7.** The work of the team investigating the report is confidential.

**5.8.** In accordance with the law, the employer may apply the following sanctions to the offender of discrimination or mobbing:

- change of the employment relationship;
- termination of the employment relationship;
- holding the offender liable to disciplinary action for breach of his/her employment duties.

**5.9.** The employer may also impose sanctions on employees who intentionally and deliberately accuse other employees of discrimination or mobbing.

## **6. Final provisions**

**6.1.** The employer may conduct training on the application of the regulations of this Policy and employees are obliged to participate in such training.

**6.2.** All Company employees are obliged to read the contents and provisions of this Policy.





ANTI-DISCRIMINATION AND ANTI-MOBGING  
POLICY AT VITRINTEC Sp. z o.o.  
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