

# ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Creating a respectful workplace in Alstom



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## Global anti-discrimination and anti-harassment policy

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# 1. Objective and applicability

# Objective



In compliance with the Code of Ethics and with the Diversity and Inclusion Charter, Alstom is committed to promoting the fair and respectful treatment of individuals within the company.

Alstom prohibits all discrimination with respect to age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical beliefs, trade union membership, or other characteristics protected by applicable laws and regulations.

Alstom does not tolerate any form of violence, harassment, verbal abuse, or any other conduct that creates a hostile work environment or is offensive to the rights of employees.

As stated in the description of our Inclusive value,

*“We design inclusive mobility solutions in a work environment and culture where differences are embraced, respected and leveraged without any bias. Everyone has the opportunity to contribute and achieve success in Alstom”.*

To make diversity flourish we ensure a truly inclusive environment of safety and belonging.

The purpose of Alstom’s global anti-discrimination and anti-harassment policy is to provide practical guidelines on how to support our commitment to treat all employees with dignity and respect in a workplace free from discrimination and harassment.

This policy is established to ensure that discrimination and harassment of any kind is prevented or identified and addressed appropriately.

# Applicability



This policy applies to all Alstom employees.

This policy applies in all Alstom workplaces and related settings, including both on Alstom premises (e.g. offices, production units) and outside, such as on the phone, virtually, or 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 or between colleagues outside of work .

All employees must follow the legislation of the country they operate in. These laws take priority over this policy. Where these have less stringent requirements than the global policy, then the groups and definitions of this global policy apply.

Alstom is committed to working with and encouraging its stakeholders to uphold the principles in this policy and as needed, to adopt similar policies within their operations.

All employees are required to read this policy and ensure they fully understand their obligations to comply with this policy.


## 2. Definitions

# Definitions

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As used in this policy, **'employee'** shall mean and include any person on the active payroll of the company including managers and workers, those on contract, temporary, part-time, apprentices, trainees, as well as applicants for employment.

**'Discrimination'** is treating, or proposing to treat, someone unfavorably because of a personal characteristic such as:

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- Age
  - Gender, gender expression, gender identity, sexual orientation
    - Parental status, pregnancy, childbirth, or breastfeeding
    - Physical appearance
    - Physical or mental disability, medical condition, genetic information or characteristics (or those of a family member)
    - Protected military or veteran status
    - Race, colour, ethnic or national origin; Nationality, immigration status, citizenship, or ancestry
    - Religious or politics beliefs
    - Social background or education
  - Status as a victim of domestic violence, assault, sexual assault or stalking
  - Any other personal characteristic protected by the law

This list is not exhaustive. It is discrimination for an employer to base any decisions regarding the terms and conditions of employment on personal characteristics. Examples of decisions regarding terms and conditions of employment are set out at [Annex 1](#).

**'Harassment'** is a type of discrimination. It is a conduct that is unwanted and/or offensive and that has the purpose or effect of violating a person's dignity or creating an intimidating, humiliating, or hostile environment. It can be a single event or recurring behaviors of an offensive nature. Examples of harassment are set out [Annex 2](#).

**'Sexual harassment'** is a specific and serious form of harassment. It is a conduct of a sexual nature that is unwanted by the person to whom it is directed including unwanted sexual advances and requests for sexual favours. Sexual harassment may occur between persons of the opposite or same sex. Both men and women can be either the victims or the offenders. Depending on the country, sexual harassment can be punished by law, so it may require reporting to local authorities.

Examples of sexual harassment are set out at [Annex 3](#).

### 3. Roles & Responsibilities

# Employee responsibilities

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## Creating a discrimination- and harassment-free work environment is everyone's responsibility.

All employees can contribute to fostering an inclusive work environment, leading by example and demonstrating mutual respect and must not engage or participate in any harassing or discriminatory behaviors.

Every employee deserves to be treated with respect and has a responsibility to treat others with respect. Alstom employees can prevent discrimination and harassment by:



- if you feel comfortable doing so, you should respond to discriminatory or harassing conduct in a way that demonstrates that the conduct is unwelcome. However, you are not required to complain directly to the offending individual;
- participating in company learning opportunities related to fostering a discrimination- and harassment-free workplace environment;
- report if you observe or experience any form of harassment or discrimination to your manager, HR business partner or use any other channel to report as per the procedure set out in this policy.



# Manager responsibilities

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In order to build inclusive teams, all managers should lead by example by modeling respectful and appropriate standards of behaviors and not tolerating disrespectful and inappropriate behavior.

Managers must take steps to educate and make employees aware of their obligations under this policy and the law.

Managers must act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard.

Managers must intervene quickly and appropriately when they become aware of inappropriate behaviour and help employees to resolve complaints informally.

Managers must deal with allegations of discrimination and harassment at the onset. If an employee informs a manager that they believe to have been the target of harassment or discrimination, the Manager must:



- Meet with the employee promptly, and
- Discuss the resolution options available depending on the situation, such as:
  - meeting with the appropriate HR business partner and identify together further actions to be taken in order to mitigate effects and guarantee no discrimination and harassment going forward
  - following-up with the employee to check if further support is needed

All managers who receive a formal complaint or information from another employee about alleged discrimination or harassment or who otherwise observe or suspect any of the same, are required to report such conduct promptly to Human Resources or to the Alstom Alert Procedure.

## 4. Actions

## Reporting a violation of this policy

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Employees who experienced, observed or suspects that conduct prohibited by this policy has occurred, should take one or more of the following steps:

- Respond to conduct prohibited by this policy in a way that demonstrates that the conduct is unwelcome, if feeling comfortable doing so. Sometimes, people do not realize the impact that their behaviors and actions have on others. However, employees are not required to complain directly to the offending individual.
- Reporting to Management: if the 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 designated HR Business Partner: 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 the incident using the Alert Procedure [EthicsPoint – Alstom](#)

## Confidentiality & protection against retaliation

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Alstom takes every measure to respect employee confidentiality. No employee will be subject to any form of retaliation for reporting in good faith, reports violations of this policy, or for cooperating with any issue requiring follow-up.

The Company will adopt the corrective measures that it deems relevant in relation to any violation of this policy. Measures may include for example, training, counselling and/or disciplinary action such as a warning, suspension without pay, or dismissal













**A respectful workplace is more than compliance with the law. It is about a working environment free of discrimination, harassment, and inappropriate behavior of any kind.**

## 5. Annexes

# Annex 1 Discrimination

This is non-exhaustive list of decisions regarding terms and conditions of employment that constitute discrimination if based on personal characteristics:

## DISCRIMINATION EXAMPLES













-  Hiring;
-  Firing;
-  Promoting;
-  Disciplining;
-  Training;
-  Compensating;
-  Setting objectives;
-  Development opportunities;
-  Transfers;
-  Schedule changes;
-  Exclusion or isolation;
-  Tasks distribution;

This list is non-exhaustive and there may be other examples under applicable laws.

## Annex 2 Harassment

This is non-exhaustive list of behaviours that could constitute harassment, and there may be other behaviours that constitute harassment under applicable laws.








### HARASSMENT EXAMPLES

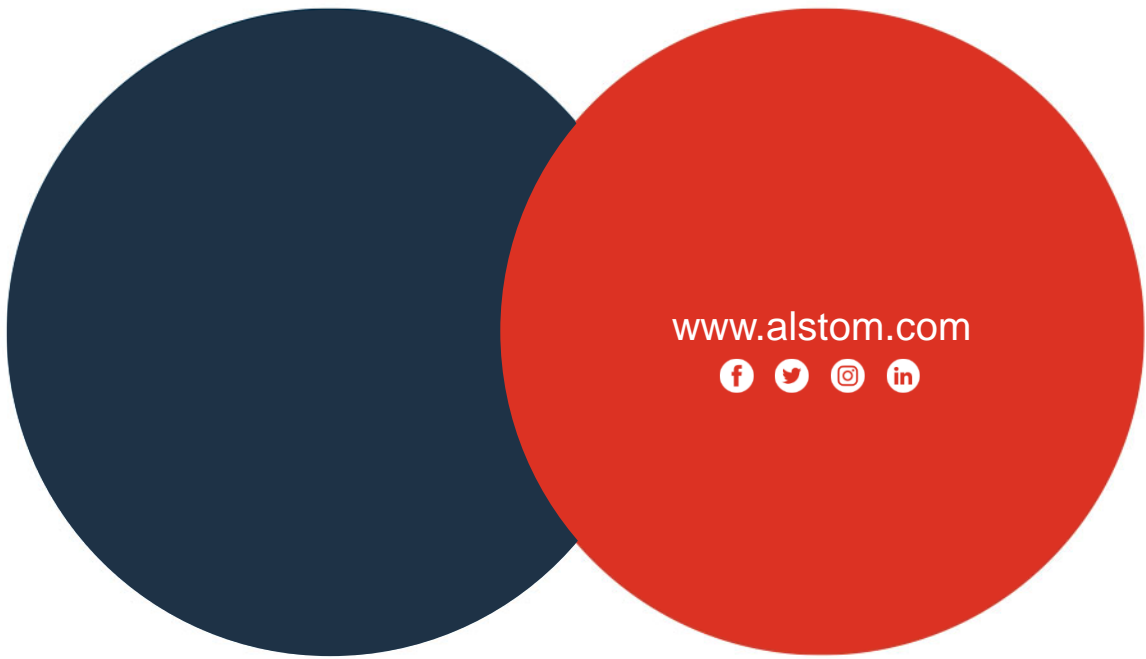
-  Derogatory or insensitive jokes, pranks, or comments; Comments that ridicule or stereotype people; using sarcasm to belittle others
-  Racial slurs, derogatory remarks about a person's accent, display of racially offensive symbols
-  Unwanted and inappropriate physical contact including touching, pinching, pushing, grabbing, unnecessarily brushing up against someone, invading personal space, and physical assault
-  Innuendos or veiled threats
-  Sabotaging a person's work, or deprivation of working tools
-  Degradation of professional or personal stuff
-  Deliberately excluding someone from meetings or communications without a business justification
-  Creation of arbitrary standards for one person, imposing unrealistic demands, or using supervision to intimidate a person
-  Displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory and inappropriate
-  "Outing" (or threatening to "out") someone's sexual orientation or gender identity, and deliberate misgendering
-  Offensive comments about appearance, or other personal or physical characteristics
-  Intimidating acts, such as bullying or threatening physical assault; Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual

## Annex 3 Sexual harassment

This is non-exhaustive list of behaviours which could constitute sexual harassment, and there may be other behaviours that constitute sexual harassment under applicable laws:

### SEXUAL HARASSMENT EXAMPLES

-  Inappropriate physical contact including touching, pinching, pushing, grabbing, unnecessarily brushing up against someone, invading personal space, and sexual assault
-  Stalking or pursuing a person with unwanted attention, gifts, or messages
-  Unwelcome sexual advances or suggestive behavior, or any suggestions that sexual favors may further a career or that a refusal may hinder it
-  Sexual epithets, jokes, references to sexual conduct, gossip regarding someone's sex life, inquiries into someone's sexual experiences
-  Leering, whistling, sexual gestures or suggestive or insulting comments
-  Continued suggestions or requests for dating, romance, or social activity after someone has said "no" or otherwise indicated the requests are unwelcome
-  Sending or displaying material that is pornographic or that others may find offensive (including emails, text messages, video clips, and images sent by mobile phone or posted on the internet)



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