

Global bullying, discrimination, and harassment policy

Ørsted is dedicated to ensuring a safe and inclusive working environment for all employees. Upholding Ørsted's guiding principles means actively working to create a working environment that is free from bullying, discrimination, and harassment. Such behaviours are unacceptable, as all Ørsted employees deserve to be treated with dignity and respect.

Introduction

Ørsted believes in an employee's right to work in an environment that contributes positively to their health, psychological safety, and emotional well-being.

To uphold these values, and Ørsted's guiding principles, the purpose of this policy is to set Ørsted's global position on bullying, discrimination, and harassment and to demonstrate Ørsted's commitment to the creation of a workplace free of such behaviours.

Eligibility

This policy applies as of 1 May 2022 and includes all employees in all Ørsted entities. This policy also applies to external consultants working under Ørsted supervision. If any provision in this policy conflicts with country legislation, such legislation shall prevail.

All employees and external consultants must keep themselves informed about and follow this policy, and Ørsted reserves the right to review and amend this policy at any time.

Scope of policy

This policy covers a potential situation where an employee feels subject to bullying, discrimination, or harassment from another employee. This policy also covers experiences that an employee has with an external consultant working under Ørsted supervision.

Any Ørsted employee can experience bullying, discrimination, or harassment. It may happen intentionally or unintentionally, within or between all levels in the organisation, and may be carried out by anyone in the organisation.

This policy covers incidents that happen at the physical office, in the virtual workspace, in text services, on business trips, and in any other Ørsted-related context. Incidents that occur outside an Ørsted context that may have an impact on the working environment in Ørsted can be reported using this process.

Rights - employees

All employees have the right to work in an environment that does not include bullying, discriminatory, and harassing behaviours and the ability and support to report all incidents of bullying, discrimination, and harassment without fear of retaliation.

Furthermore, all employees have the right to name and describe their experience in a report and have that report taken seriously and investigated thoroughly.

Finally, all employees have the right to a fair, objective, timely, and thorough investigation of reports, for both reporting and responding parties, and, depending on the circumstances and to the extent possible, have temporary or permanent adjustments made to their working environment, while a report is being investigated.

Responsibilities – employee

All employees in Ørsted must contribute to the creation of a working culture that is engaging, supportive, and free of negative and harmful behaviours. All employees are obligated to take intentional and thoughtful steps towards having positive engagements with their co-workers and teammates, disagree civilly, and refrain from causing intentional harm in either words or actions that other employees could experience as bullying, harassing, or discriminatory. Employees who submit reports of bullying, discrimination, or harassment are assumed to do so in good faith (meaning the reports are accurate and truthful to the employees' experience).

Responsibilities – people leaders

All people leaders in Ørsted have the additional responsibility to ensure that employees in their team are equally able to access and understand the bullying, discrimination, and harassment policies and guidelines, globally and locally.

Furthermore, all people leaders have the responsibility to be a role model for inclusive, welcoming, and caring behaviours towards all Ørsted employees and to be intentional about creating inclusive teams where employees' whole selves are respected and valued.

Finally, all people leaders have the responsibility to offer support and empathy for any of their employees involved in an incident of bullying, discrimination, or harassment and to take all cases brought to their attention seriously.

Responsibilities - Ørsted

Ørsted as an organisation has the responsibility to take all reported cases seriously and provide fair outcomes for investigated cases that take all parties' needs into consideration. Ørsted will also maintain secure and confidential records of reports and outcomes.

Furthermore, Ørsted as an organisation has the responsibility to enforce this policy consistently for all employees at all career levels and provide

support and suitable workplace accommodations to employees who are involved in a reported incident of bullying, discrimination, or harassment.

Finally, Ørsted has the responsibility to support the creation of a safe and inclusive workplace environments by promoting a positive organisational culture, practicing accountability, providing resources for safe workplace initiatives, and ensuring that relevant employees involved in the process are adequately trained in responding to and investigating issues of bullying, discrimination, and harassment in fair, empathetic, and objective ways.

Definitions

Please be informed that the behaviours noted in this policy are not exhaustive and may be exhibited in a variety of ways.

What are bullying behaviours?

Bullying may encompass a range of behaviours which are spiteful, offensive, mocking, derogatory, insulting, or hurtful. Bullying may be directed at an individual or at a group of people. Bullying behaviours intimidate, embarrass, upset, exclude, or demean another person, intentionally or unintentionally. Bullying may include the following types:



1. **Physical** – this type of bullying involves negative, unwanted, or unwelcome physical contact.
2. **Verbal** – this type of bullying involves saying or writing mean or hurtful things which degrade or demean someone. Verbal bullying includes oral language, gestured language, and written language.
3. **Emotional** – this type of bullying uses emotions to criticise, shame, blame, or manipulate another person.

What are discriminatory behaviours?

Discrimination is unequal, biased, offensive, hurtful, or inappropriate behaviour directed at a person due to an aspect of one or more of their identities. Identity encompasses a wide range of protected characteristics, such as sex, race, nationality, sexual orientation, gender identity, religion, size, ability status, pregnancy status, age, ethnic origin, belief, and marital status.

What are harassing behaviours?

Harassment is unwanted physical, verbal, or non-verbal contact that has the purpose or outcome of violating a person's dignity or integrity and creating an intimidating, hostile, degrading, humiliating, or uncomfortable environment for them. Harassment may be identity-based and could be directed at someone due to one of their identities, such as sex, race, nationality, sexual orientation, gender identity, religion, size, ability status, pregnancy status, age, ethnic origin, belief, and marital status.

These behaviours also include any unwanted physical, verbal, or non-verbal contact of a sexual nature (i.e., sexual harassment, sexual assault, etc.).

Global employee and people leader guides

This policy is supplemented by global guides for employees and people leaders to provide guidance and transparency on the reporting process, roles and responsibilities, and how to create positive working environments. They are located here.

If any employee feels they have experienced an instance of bullying, discrimination, or harassment they are encouraged to first talk about the issue and seek support from a people leader, HR business partner, head of country P&D, regional head of P&D. Employees can also move directly to submitting an official report, which will be received and investigated by head of country P&D or head of regional P&D.

Country-specific guidelines and procedures

In addition to the global guidelines, this policy is supplemented by country-specific guidelines and procedures to ensure implementation and compliance, e.g., country policies, guidelines, or employee handbooks.

Contact

If there are any questions to this policy, please contact the policy owner.

If any employee feels they have experienced an instance of bullying, discrimination, or harassment they are encouraged to seek support. Employees can also make an official report to either their head of country People & Development or head of regional People & Development, or utilise Ørsted's global whistleblower hotline.

For further information on Ørsted's global and country-specific employment terms and policies, please see [the relevant pages on Vital](#).

Policy owner

This policy is owned by People & Development.

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Breach of the policy

Depending on the circumstances, breaching this policy may invoke local disciplinary procedures and have consequences for any employee found responsible of such a breach.

