

GRUNDFOS HARASSMENT PREVENTION POLICY



Grundfos is committed to a safe and inclusive workplace free of abuse and harassment. This is spelled out in the [Grundfos Code of Conduct](#), where we commit to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, customers, and any other parties doing business with Grundfos (Rule 13) and a workplace free of discrimination, harassment or abuse (Rule 14).

This Policy outlines in detail this commitment and its implementation.

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GRUNDFOS WILL

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- Provide a safe environment for all its employees, free from abuse and harassment in line with Grundfos Human Rights commitment and the standards set by ILO Convention 190 on the matter
- Not accept any form of harassment and abuse in the workplace
- Treat all incidents seriously and promptly investigate any allegations of harassment and abuse
- Take all complaints of harassment and abuse seriously and treat them with respect and confidence
- Ensure disciplinary action is taken for any person who has been found to have discriminated or harassed, up to and including dismissal from employment
- Ensure no one will be retaliated against for making such a complaint, such as but not limited to threats, termination, salary deductions, demotions, or negative implications related to potential promotions or pay increases.
- Implement this Policy across its operations globally, following local legislation and local policies as well as providing training and support to all employees and particularly people managers
- Provide means of redress and reporting, as well as proactively and effectively communicating the channels and resources available for employees to share their concerns about workplace harassment and abuse

This Policy applies to all employees and members of board of directors in all countries and in all positions in the Grundfos Group, subject to local policies which control. It applies whether you are a member of a supervisory board, a part of Group Management, hold a managerial position or are at any other level. It applies whether you are an office worker or a factory worker of Grundfos Holding and its subsidiaries. Grundfos will seek to continuously review this policy with input from external and internal stakeholders, and whenever its processes are further improved.



WHAT IS EXPECTED FROM YOU?

You should:

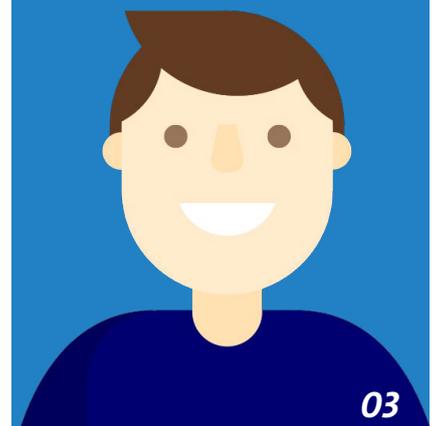
- Treat your colleagues with dignity and respect. Every employee should consider whether their words or conduct could be offensive to others. Although harassment may not always be intentional, it is never acceptable.
- Avoid any kind of unwelcome conduct which makes a person feel offended, humiliated, and/or intimidated.
- Familiarize yourself with and understand the standards of behaviour set out in this Policy and in our code of conduct and act in accordance with such standards. Seek guidance if in doubt.
- Disclose any instance of harassment or abuse of which you become aware of to your line manager, your manager's manager or your HR business partner whether you were a victim yourself or witnessed an incident involving another person.

You can:

- Feel empowered to act when you witness harassment or abuse against persons at Grundfos workplaces, without fear of reprisal or retribution.
- If subject to harassment or abuse in the workplace, when possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Grundfos recognizes that harassment and abuse may occur in unequal relationships (e.g. between a manager and her/his employee) and that it may not be possible for the victim to inform the alleged harasser.
- If as victim you cannot directly approach an alleged harasser, you can approach your line manager, your manager's manager or your HR business partner, responsible for receiving complaints of harassment and abuse.
- If you are not comfortable with reporting the incident internally, you can raise a complaint through the [Grundfos Whistle-blower](#) hotline. The complaint will be promptly investigated subject to confidentiality and you can choose to remain anonymous throughout the process. Any form of reporting will be protected against reprisals and retribution.

Grundfos' policy provides that in cases with direct internal reporting, management must communicate with the reporting party when the investigation is complete, confirm that appropriate action was taken and encourage the individual to report any further complaints of harassment or retaliation. Company policy also provides that management should follow-up periodically with the individual who reported the behaviour to confirm that the offending conduct has stopped. Anonymity will be guaranteed if the person wishes not to disclose their identity, and confidentiality will be maintained throughout the case.

A violation of this Policy is ground for disciplinary action up to and including termination. Managers and HR business partners, who fail to promptly address complaints of harassment or abuse from their employees will also be subject to disciplinary action.



WHAT ARE HARASSMENT AND VIOLENCE?

The ILO Convention 190, with Recommendation 260, is the first international standard defining harassment and violence in the workplace. This Policy embraces the definitions set out by ILO Convention 190.

Harassment and violence are a range of unacceptable behaviours and practices that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm and include gender-based violence and harassment. Examples of conduct or behaviour (physical, verbal, and non-verbal) which constitute harassment and violence include, but are not limited to:

- Unwanted conduct or conduct that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, offensive environment.
- Inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks, including but not limited to comments on a worker's appearance, age, gender, sexual orientation, nationality, ethnic origin, political views, religious creed, private life, etc.
- Unnecessary or unwanted physical contact, even where the offender considers it to be inoffensive, and which can include the invasion of personal space, touching, pinching, hugging, kissing, or brushing against another employee's body.
- Physical violence, including assault or coercing sexual relations.
- Unwelcome sexual behaviour, which might be perceived by the offender to be harmless flirting, and which may involve suggestions, advances, propositions, whistling, leering, or pressure for sexual activity.
- Suggestions that sexual favours may further an employee's career or that refusal of sexual favours may hinder it.
- Continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome.
- The display or circulation of offensive pictures, objects, or written materials which, for example, may be considered pornographic or offensive to particular ethnic or religious groups.

Workplace violence and harassment can happen beyond the physical workplace: the provisions of this Policy apply to workplace defined as:

- Private and public spaces where employees conduct their work;
- Places where employees take rest breaks or meals, or use sanitary, washing and changing facilities, including employer-provided accommodation;
- Work-related trips or traveling, training, events or social activities;
- Through work-related communications enabled by information and communication technologies, including online chats and social media.
- If reasonable, when commuting to and from work.

The Policy also seeks to apply not only to Grundfos employees, but workers defined as persons working irrespective of their contractual status: persons in training including interns and apprentices, workers whose employment has been terminated, volunteers, job seekers and job applicants. It includes office and manufacturing sectors, whether in urban or rural areas.