

# **STAND TOGETHER**

AGAINST HARASSMENT, BULLYING AND DISCRIMINATION

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February 2022

**BESTSELLER**

**We stand together and take care of each other**

Our company is built upon fairness, opportunities, and a sense of responsibility towards our surroundings, including one another. Our founding principles guide our actions and determine how we do business. As a family-owned company, we are built on relations, and we base all our relations on trust, respect, honesty, and dignity. We stand together and take care of each other.

We believe that diversity is an advantage promoting quality, good results and strong values. Therefore, at BESTSELLER, we do not tolerate any forms of harassment, bullying, intimidation, or discrimination, and in line with our Code of Ethics, we seek to prevent all forms of unacceptable behaviour.

We all have a shared responsibility to ensure that unacceptable behaviour does not take place in BESTSELLER in any forms. We take pride in the good examples we set for one another and strive to maintain a work environment in which colleagues, applicants, customers, suppliers, visitors, partners and other people are treated with respect and dignity. This applies to all work situations as well as social, work-related events and behaviours on social media.

Despite our commitments, you may observe conduct that concerns you. This policy describes what you can do if you experience or witness harassment, bullying, intimidation, or discrimination, and how BESTSELLER deals with the uncompliant behaviour. By sharing your experiences, you give BESTSELLER the opportunity to review and act on the issue.

We acknowledge, that speaking about your situation can be difficult when you are a victim of harassment, or when you witness it. BESTSELLER will not tolerate any forms of retaliation against you for sharing your experiences. Both colleagues and external parties who report a case are protected and will not suffer for raising concerns in good faith about a suspected misconduct.

**What is harassment and in what kind of forms may it occur?**

Harassment is any unwanted written/visual, physical, verbal, or non-verbal conduct which has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Workplace harassment includes unwelcome behaviours based on someone's beliefs and behaviour, race, ethnic or national origin, skin colour, religion, health condition, age, marital status, gender identity and expression, sexual orientation, etc.

A single incident of unwanted or offensive behaviour to one individual can amount to harassment if it is perceived as abusive or degrading by the recipient. For example, jokes or physical gestures such as playful shoving can be considered as inappropriate behaviour, if the behaviour makes the recipient feel uncomfortable.

Harassment may have many types, and this policy applies to, but is not limited to:

- **Bullying and psychological harassment:** offensive, intimidating, malicious or insulting behaviour which can undermine an individual's self-confidence, competence, and self-esteem, as it makes the recipient feel vulnerable, humiliated, or threatened. It often includes intimidating comments, gestures, offensive jokes or pranks, sarcasm, and personal humiliation. It might as well include ignoring or shunning a colleague, for example, by deliberately excluding them from a conversation, meeting, or a workplace social activity. This type of harassment can also come in the form of spreading rumours, ridiculing others, or sharing critical remarks. However, it does not include legitimate and constructive criticism of a colleague's performance or behaviour, or reasonable requests made of colleagues.
- **Physical harassment:** unnecessary or unwanted physical contact, which the alleged offender might perceive as prank, and which can include the invasion of personal space, touching or brushing against another individual's body, violence, physical attacks (e.g., hitting, shoving), threats, assaults or destroying property to intimidate someone.
- **Sexual harassment:** unwelcome sexual conduct or gender-abusive behaviour that can be experienced by everyone regardless of gender or sexual orientation (including LGBTQ+ persons (gay and bisexual, transgender, and self-proclaimed queer persons; persons who are not heterosexual)).  
Sexual harassment and gender-abusive behaviour may come in many forms: inappropriate sexual gestures, comments, jokes or questions, suggestions, advances, propositions or pressure for sexual activity, irrelevant inquiries about sexual topics, or other unwanted allusions via e-mail, chat, text message, photo material, etc. What characterises all of them is a sexual or gender-abusive behaviour that can be perceived as unpleasant and unwanted, even if the alleged offender might perceive it to be harmless flirting or joking. Sexual harassment can also include suggestions that sexual favours may further a colleague's career (e.g., a promotion, raise) or that refusal of sexual favours may hinder it (e.g., demotion, termination).

Most types of harassments can take place in various forms, such as (non-exhaustive examples):

- **Written or visual harassment:** the display or circulation of offensive or obscene pictures, objects, written materials (including cards, notes, and letters), emojis or other visual forms. It includes emails, text messages, film clips, GIFs and photographs taken by mobile phone cameras as well as content uploaded onto websites, and any other written or graphic material.
- **Physical harassment:** unwelcome touching, pinching, pushing as well as grabbing, shoving, punching and other forms of physical contact.

- **Verbal harassment:** the manner in which individuals speak to and about one another, could include mean or unpleasant expressions, threatening, yelling, spreading lies and gossip, etc.
- **Non-verbal harassment:** using mimics, gestures or cursing at a person in public or in private, etc.

This applies both to the cooperation between colleagues, and between BESTSELLER employees and applicants, customers, suppliers, visitors, partners, and other persons.

### **How can you resolve the situation in an informal way?**

Whether you are an internal BESTSELLER employee or an external partner, if you consider that you are being harassed, we recommend that you initially attempt to resolve the situation informally. You can explain to the person who offends you clearly that the specific behaviour is not welcome and that it offends you or makes you feel uncomfortable. If you witness that an individual might be harassed, we suggest that you raise awareness among those who are involved, and then let them resolve the problem (if any) informally.

As a colleague, if you are in any doubt whether an incident or series of incidents which have occurred constitute a type of harassment, then in the first instance you should talk to your Manager or the PEOPLE (HR) Team confidentially, on an informal basis. They will be able to advise you on how the matter should be dealt with.

In circumstances when it is too difficult for you to follow the informal procedure as a colleague, you could also seek support from your Manager or a colleague from the PEOPLE (HR) Team. If the conduct continues or if it is not appropriate to resolve the situation informally, it should be raised through the formal procedure set out below.

As an external partner, if the informal resolution is too difficult or not successful, or you are in doubt about the situation, you can always ask for help contacting a BESTSELLER PEOPLE (HR) representative.

### **How can you resolve the situation in a formal way?**

Where informal methods fail, or serious bullying or harassment occurs, you are advised to report the situation formally to the PEOPLE (HR) Team. You can contact the PEOPLE (HR) Team directly and speak to a trusted PEOPLE (HR) representative in confidence.

BESTSELLER takes enquiries about any type of harassment seriously and keep the information confidential. Each enquiry will be thoroughly investigated and followed up with the necessary precautions. An investigation will be carried out quickly, sensitively and with due respect for the rights of both you and the alleged offender, to protect all parties from retaliation.

As part of the investigation, a representative from the PEOPLE (HR) Team will meet you to ask additional information. You have the right to be accompanied by a neutral person of your choice. The representative from the PEOPLE (HR) Team will also meet with the alleged offender who may also be accompanied by a neutral person of their choice. It may also be necessary to interview witnesses to any of the incidents mentioned in your complaint, and they will be subject to confidentiality.

### **Report via the Whistleblower programme (reporting tool)**

Alternatively, you can report the incident via our online and confidential reporting tool, the Whistleblower programme, if the incident falls within the scope hereof. We encourage you to provide your name in the report, but you may also choose to be anonymous (the system does not log IP addresses, machine IDs and does not use cookies). If you decide to remain anonymous, BESTSELLER can still communicate with you through the Whistleblower system, so please remember to write down your case number and visit the system for feedback or questions. When the report has been successfully submitted, a confirmation page will be shown on the website.

[You can find our Whistleblower programme here.](#)

All data collected during the reporting and investigation will be handled and stored in line with BESTSELLER's internal [Privacy Handbook](#) and external [Privacy Policy](#).

### **Consequences of non-compliance**

If your complaint is well-founded (i.e., misconduct has indeed taken place), appropriate measures will be taken where necessary in accordance with our internal policies. Consequently, disciplinary action may be taken against the offender, and it may have consequences, such as warning, termination of employment or dismissal. Under certain circumstances, the outcome of an investigation may lead to a formal report being filed with the police or another authority. Peer pressure to attempt to discourage harassment victims from complaining is also seen as misconduct.

BESTSELLER takes these matters very seriously. However, malicious complaints of bullying or harassment can have a serious and detrimental effect upon an individual. Knowingly making a false accusation and a misuse of this policy is considered as a violation of our Code of Ethics and may lead to disciplinary measures.

### **What can you do if the harassment continues?**

If the harassment you have experienced continues, we encourage you to contact the PEOPLE (HR) Team again or report it via the Whistleblower programme. Alternatively, you are welcome to contact the Chief PEOPLE Officer directly and a new investigation will be initiated.

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