

Since its foundation, Spreenauten GmbH has stood for absolute equality and prohibits any form of discrimination. We represent this ideally also socially and support the change to a diverse society in which every person can live and be happy according to his or her own ideas.



In order to realise this claim in our company we have developed the following guideline for equal treatment and anti-discrimination:

### **Anti-discrimination/anti-harassment policy and complaint procedures the Spreenauten GmbH**

#### **1. Objectives**

Spreenauten GmbH is committed to a working environment in which all people are treated with respect and dignity. Every individual (d / w / m) has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits illegal discriminatory practices, including harassment. Therefore, the Spreenauten GmbH expects that all relationships between people in the office are businesslike and free of discrimination, prejudice and harassment.

Spreenauten GmbH has developed this policy to ensure that all its employees:inside (d / w / m) can work in an environment that is free of unlawful harassment, discrimination and retaliation. Spreenauten GmbH will make all reasonable efforts to ensure that all affected parties are familiar with these guidelines and are aware that any complaint that violates these guidelines will be properly investigated and resolved.

Any employee:in (d / w / m) who has questions or concerns regarding these guidelines should speak with the human resources department or a member of the committee for human resources practices.

This policy should not and should not be used as a basis for excluding or segregating persons of a particular gender or other protected characteristic from participation in business or work-related social activities or discussions. In other words: No one should make the mistake of engaging in discrimination or exclusion to avoid being accused of harassment. The German constitution as well as the guidelines of the Spreenauten GmbH prohibit unequal treatment based on gender or any other protected characteristic with regard to the terms, conditions, privileges and advantages of employment. The prohibitions of harassment, discrimination and retaliation are intended to supplement and promote these guidelines, but not to form the basis for an exception to them.

#### **2. Equal Employment Opportunities**

It is the policy of the Spreenauten GmbH to guarantee equal employment opportunities without discrimination or harassment based on race, skin colour, religion, gender, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information or any other legally protected feature. Spreenauten GmbH prohibits any such discrimination or harassment.

### **3. Retaliatory Measures**

Spreenauten GmbH encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Spreenauten GmbH to investigate such reports immediately and thoroughly. Spreenauten GmbH prohibits retaliatory measures against any person who reports discrimination or harassment or takes part in an investigation of such reports.

### **4. Sexual Harassment**

Sexual harassment constitutes discrimination and is illegal. For the purposes of this Directive, "sexual harassment", as defined in the European Commission's Directives on Equal Opportunities in Employment, is defined as unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature, where, for example, it is unlawful or unwanted. B: a) subjection to such conduct is either explicitly or implicitly a condition of employment of a person, b) subjection to such conduct or rejection of such conduct by a person is used as a basis for employment decisions affecting that person, or c) such conduct has the purpose or effect of unduly impairing a person's job performance or of creating an intimidating, hostile or offensive work environment.

Spreenauten GmbH complies with Chapter VII of the US Civil Rights Act of 1964, which recognizes two types of sexual harassment: a) quid pro quo and b) hostile work environment. Sexual harassment can include a range of subtle and not so subtle behaviours and can affect people of the same or different sex. Depending on the circumstances, these behaviors may include unsolicited sexual advances or requests for sexual favors, sexual jokes and innuendo, verbal abuse of a sexual nature, comments about the body, sexual skills or sexual deficiencies of a person, lascivious looking, whistling or touching, insulting or obscene comments or gestures, displaying sexually suggestive objects or images in the workplace, and other physical, verbal or visual behaviors of a sexual nature.

### **5. Harassment**

Harassment on the basis of other protected characteristics is also strictly prohibited. According to this Directive, harassment is any verbal, written or physical conduct that denigrates, disparages or displays hostility or aversion towards a person because of that person's race, colour, religion, sex, sexual orientation, sexual identity or expression, national origin, age, disability, marital status, citizenship, genetic information or other legally protected characteristics or those of his/her relatives, friends or acquaintances:

- (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment
- (b) has the purpose or effect of unduly interfering with the performance of a person's work; or
- (c) otherwise adversely affects the employment opportunities of any person.

Harassing conduct includes epithets, slurs or negative stereotypes, threatening, intimidating or hostile acts, denigrating jokes and written or graphic material which denigrates or shows hostility or dislike towards a person or group and which is displayed on walls or elsewhere on the premises of the employer or is distributed at the workplace, during working hours or by using means of communication by e-mail, telephone (including voice messages), text messages, social networking sites or in any other way

## **6. Persons and Behaviour recorded**

These guidelines apply to all applicants:inside (d / w / m) and employees:inside (d / w / m), regardless of whether they refer to the behaviour of colleagues:inside (d / w / m) or of persons who are not directly connected with Spreenauten GmbH (e.g. an external salesperson:inside\*, consultant:inside\* or customer:inside \*(d / w / m)).

The behaviour prohibited by these guidelines is unacceptable at the workplace and in any work-related environment outside the workplace, such as business trips, business meetings and business-related social events.

## **7. Reporting an incident of harassment, discrimination or retaliation**

Spreenauten GmbH encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the identity or position of the perpetrator. Persons who believe that they have been the victim of such behaviour should discuss their concerns with their immediate superior, a member of the Personnel Committee, the Human Resources Department, an ombudsman or our current Equal Treatment & Anti-Discrimination Representative. See also the complaints procedure described below.

In addition, Spreenauten GmbH encourages persons who believe they are exposed to such behaviour to immediately inform the perpetrator that their behaviour is undesirable and to demand that the behaviour be stopped. Often this measure alone can solve the problem. However, Spreenauten GmbH acknowledges that an individual may prefer to pursue the matter through complaint procedures.

## **8. Complaint**

Individuals who believe they have been a victim or witness of conduct prohibited by this policy should discuss their concerns with our current Equality Officer.

Spreenauten GmbH is committed to the immediate reporting of complaints or concerns so that quick and constructive action can be taken before the relationship is irreparably damaged.

Therefore, although no fixed reporting period has been established, early reporting and intervention has proven to be the most effective method to resolve actual or alleged incidents of harassment.

All reported allegations of harassment, discrimination or retaliation are investigated promptly. The investigation may include individual interviews with the parties involved and, if necessary, with persons who have observed the alleged conduct or who may have other relevant knowledge.

Spreenauten GmbH maintains confidentiality during the entire investigation process as far as this is compatible with an appropriate investigation and appropriate corrective measures.

Retaliation against a person for reporting harassment or discrimination or for participating in an investigation of a complaint of harassment or discrimination constitutes a serious violation of this guideline and will be punished disciplinarily, just like the harassment or discrimination itself. Retaliation should be reported immediately and will be investigated and dealt with promptly.

Misconduct constituting harassment, discrimination or retaliation shall be dealt with appropriately. Countermeasures can include, for example, training, referral to a counselling centre or disciplinary measures such as warning, reprimand, withholding a promotion or salary increase, transfer, temporary suspension without payment or termination, depending on what Spreenauten GmbH considers appropriate under the given circumstances.

If a party to the complaint does not agree with its solution, this party can call on the managing director of Spreenauten GmbH or the COO.

False and malicious complaints about harassment, discrimination or retaliation (as opposed to complaints that, even if submitted in error in good faith) can be subject to appropriate disciplinary measures.