

# **Anti-Discrimination & Anti-Harassment Policy**

Version 2024

Release 11 – 2024

# Policy purpose and scope

**This Anti-Discrimination & Anti-Harassment Policy (“Policy”) outlines INNIO Group’s rules for maintaining a safe, inclusive, and unbiased workplace, free from any type or form of discrimination or harassment. It condemns any abusive behavior and mandates adherence for all employees, executives, and officers of INNIO Group, ensuring equal rights within INNIO Group, and zero tolerance against noncompliance for discrimination and harassment. This Policy also is expected to be complied with by our Business Partners. As an integral part of INNIO Group’s Code of Conduct, this Policy must be complied with, as must any applicable local laws and provisions.**

This Policy applies not only in the workplace but also to remote work, while on business trips, and at any work-related social events or gatherings (e.g., seminars, trainings, business meals, summer or holiday parties), even if these events are not held on INNIO Group premises.

# Definitions

**INNIO Group** refers to all companies directly or indirectly related to INNIO Jenbacher GmbH & Co OG.

**Business Partners** refers to contractors, consultants, contingent workers, temporary agency workers, and any other parties interacting with INNIO Group and/or rendering services to INNIO Group.

**Discrimination** refers to any form of deprivation or restriction of rights, as well as unfair or prejudicial treatment of a person or group based on certain characteristics, including but not limited to race, age, sex, religion, origin, skin color, nationality, language, gender, LGBTQ+, gender identity, gender expression, gender presentation, sexual orientation or characteristics, civil, pregnancy or maternity status, socioeconomic status, political affiliation or beliefs, ethnic background, trade union membership, type or duration of employment, health condition or disability, veteran status, physical appearance, place of residence, and more.

**Employees** refers to all workers and individuals employed by any INNIO Group legal entity, including full-time, part-time, permanent, and leased workers, as well as those employed under the EOR framework (so-called Employer of Record). This term also encompasses potential employees, such as candidates and job applicants.

**Harassment** refers to any offensive behavior at work that is unwanted and directed at an individual Employee or a group of Employees and can be seen as an attack or threat on to the Employee's identity, personality, dignity, or physical or psychological well-being. It also includes actions that create a hostile, intimidating, degrading, or offensive work environment. Harassment includes aggression—whether physical, verbal, or psychological—that negatively impacts the workplace or aims to humiliate or intimidate Employees. Such behavior can seriously affect an Employee's health, morale, career, or dignity.

**Labor and Human Rights Policy** refers to INNIO Group's policy aligned with the International Bill of Human Rights (comprised of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

**Sexual Harassment** is any unwelcome sexual behavior that makes someone feel uncomfortable, threatened, or offended. Such behavior can interfere with the work performance by creating an intimidating, hostile, or sexually offensive work environment.

# Principles

## Discrimination

**Discrimination of any kind is strictly prohibited throughout INNIO Group.**

INNIO Group is committed to engaging in practices that guarantee equal treatment, rights, and opportunities for its Employees. INNIO Group bases employment decisions and job assignments on job qualifications and merit (including education, experience, skills, ability, performance, and growth values) and not on personal characteristics.

INNIO Group has a strict zero-tolerance policy and expects its Employees and Business Partners to display respectful behavior toward one other.

## Harassment

**Workplace harassment is strictly prohibited throughout INNIO Group.**

INNIO Group bases its relationships on ethical and lawful practices consistent with its Labor and Human Rights Policy, respecting labor practices and human rights as well as a high standard of conduct. INNIO Group is committed not only to respecting internationally recognized human rights as relevant to its operations, but to fostering a harassment-free work environment where all Employees are treated with respect and dignity. The following behaviors are not acceptable:

- **Verbal abuse:** Making insults or demeaning comments about an Employee's work, personal life, appearance, background, or any other characteristics.
- **Derogatory language:** Using offensive language toward Employees or Business Partners.
- **Exclusion:** Deliberately leaving an Employee out of work-related social activities or meetings.
- **Undermining:** Repeatedly criticizing work or ideas or taking credit for an Employee's work.
- **Threats:** Making threats about job stability or using intimidation to create fear toward another Employee.
- **Reputation manipulation:** Spreading rumors or gossip about an Employee's personal or professional reputation.
- **Unfair treatment:** Treating an Employee differently from others, for reasons not related to job performance.
- **Abuse of authority:** Misusing a position of influence or authority against another Employee.

This list is not exhaustive.

### Sexual harassment

**Sexual harassment is strictly prohibited throughout INNIO Group.**

INNIO Group recognizes that sexual harassment is determined by how a victim perceives the behavior, not by the intent of the alleged offender. However, any of the following behaviors will not be tolerated:

- **Unwanted advances:** Repeatedly asking an Employee out despite the Employee's refusal.
- **Offensive or humiliating behavior:** Making comments or actions related to a person's sex.
- **Inappropriate touching:** Initiating unwelcome hugging, patting, or brushing against someone.
- **Sexual jokes or comments:** Making sexual innuendos, telling crude jokes, or commenting explicitly on someone's appearance.
- **Sharing explicit material:** Distributing or displaying sexually explicit images or messages.
- **Sexual favoritism:** Offering job benefits in exchange for sexual favors.

This list is not exhaustive.

# Roles and responsibilities

- All Employees and Business Partners must act ethically and respectfully toward others, regardless of their position and in line with this Policy. Employees and Business Partners are responsible for reporting harassment or discrimination and shall cooperate with appropriate investigations, respecting the confidentiality of the process.
- Officers, directors, and leaders have an extra duty to foster a harassment-free and discrimination-free environment and shall set an example about appropriate workplace behavior. They shall immediately address any harassment or discrimination acts and shall ensure that concerns are handled promptly.
- The Human Resources and Compliance departments shall investigate thoroughly all reported concerns and grievances and determine the course of action, taking into account relevant local legal provisions.

# Reporting channels and investigation procedures

Any concern or complaint involving discrimination or harassment must be raised through INNIO Group's SPEAK UP channels, available at SPEAK UP! ([sharepoint.com](https://sharepoint.com)). Concerns or grievances shall be filed as soon as possible to enable a meaningful investigation and timely implementation of countermeasures.

INNIO Group follows a strict "no retaliation" policy. INNIO Group's leaders and Employees are prohibited from taking any adverse actions or steps intended to "punish" anyone for raising a concern or filing a complaint in good faith.

# Evaluation

The Human Resources and Compliance departments shall review each of the concerns and complaints and give alleged offenders the right to respond to the allegations against them. INNIO Group ensures that all concerns and complaints against any type of discrimination or harassment are treated and investigated in a timely, sensitive, confidential, reliable, accurate, and objective manner, as described in INNIO Group's Code of Conduct and INNIO Group's Whistleblower Protection Policy.

# Disciplinary actions

**All Employees shall complete a mandatory regular training. Additional compulsory sensitivity training might be deemed as necessary.**

All cases of discrimination or harassment of any kind shall be duly treated and resolved. The Human Resources and Compliance departments shall determine whether allegations are substantiated and determine corrective actions as appropriate. Where proven, offenders shall be subject to disciplinary actions, which may include, but are not limited to, reprimand, suspension, or dismissal.

Sanctions also may be imposed against leaders who knowingly tolerated discrimination or harassment after they became aware of it, or those filing unfounded harassment complaints intended to cause harm.

# Other provisions

This Policy replaces all current internal regulations at INNIO Group covering the scope of anti-discrimination and anti-harassment, unless such internal regulations are required by local laws. In such cases, these regulations shall constitute appendices to this Policy and take precedence where the provisions of this Policy are not aligned with the relevant statutory requirements. INNIO Group's Code of Conduct; Supplier Code of Conduct; Diversity, Equity, and Inclusion Policy; and Labor and Human Rights Policy shall be read in conjunction with this Policy.

All questions pertaining to this Policy shall be sent to the local Human Resources department. The Human Resources and Compliance departments shall make the necessary adjustments to this Policy as required.

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Original release date: 11 – 2024

Latest updated version: 11 – 2024

Authorized by: VP Human Resources & VP Compliance

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