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PERSONNEL POLICY AGAINST SEXUAL HARASSMENT

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1. PURPOSE

The purpose of this policy is to contribute to a safe and healthy working environment in which all employees at Christensen & Co Architects (hereafter CCO or the firm) can thrive and feel secure.

We believe that policies should facilitate open dialogue rather than close it off.

With this policy, we aim to initiate a discussion about sexual harassment. We are aware that definitive statements taking a firm stance against sexism can potentially have the negative effect of shutting down important conversations instead of welcoming them. Through this policy, our goal is to have the entire workspace collaborate in preventing sexism and sexual harassment by developing a shared language and culture around what is unacceptable. Therefore, we collectively update our policies every year to renew and strengthen the conversation about sexism and to assess progress. This policy outlines the procedures for addressing incidents of sexual harassment in the workplace. Through our procedures and routines, we strive for all employees to be familiar with this policy.

Through this document, we establish specific personnel guidelines on how to handle and address sexual harassment, aiming to contribute to a positive work environment.

Reporting incidents of sexual harassment will not have any repercussions on the employment status of the individual who experienced the harassment.

2. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment occurs when a leader or employee engages in unwanted verbal, non-verbal, or physical behavior with sexual undertones, with the intent of violating another person's dignity, especially by creating a threatening, hostile, degrading, humiliating, or uncomfortable environment.

Engaging in sexual harassment at CCO is not acceptable. Harassment may result in employment-related sanctions for the offender, including warnings, termination, reassignment, or dismissal.

It is the aggrieved party who defines whether their boundary has been crossed. This is in accordance with labor authority guidelines, which stipulate that offensive behavior should be perceived as degrading by the affected individuals. It is irrelevant whether the actions stem from thoughtlessness or a deliberate intention to offend. The person's experience of the offensive actions is of central importance.

Examples of sexual harassment may include:

- (a) Unwanted physical contact
- (b) All forms of sexually orientated verbal harassment, such as lewd language, indecent comments, sexual or offensive sounds
- (c) All forms of sexual threats
- (d) Solicitations for sexual intercourse
- (e) Displaying images with pornographic content

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3. THE COMPANY'S STANCE ON SEXUAL HARASSMENT

At CCO, we consider any form of sexual harassment to be unacceptable.

It is important for us to ensure a positive and safe working environment where employees thrive and develop, and where both leadership and employees including employees among themselves - engage in constructive collaboration. Therefore, we actively work to prevent sexism and sexual harassment, and we respect each other's boundaries, both in everyday situations and during company events.

4. WORK PLACE BEHAVIOUR

At CCO, it is important that collaboration takes place in a professional and respectful manner, ensuring that everyone feels comfortable. Therefore, this policy applies to all activities organized by the office. Activities involve both those held at the company premises and at external locations (which could include study trips, site visits, summer parties, holiday gatherings, and similar events).

Within the office, we share knowledge, listen to each other, and show helpfulness. We communicate openly and in a trusting manner, and we do not tolerate offensive and derogatory behavior, including offensive and derogatory humor.

Compliance with this and other personnel policies is a prerequisite for employment at CCO. For further information about the office's values, please refer to the employee handbook.

5. HOW WE HANDLE SEXUAL HARASSMENT

All employees at CCO have the right to speak up and should have the feeling of being able to express their concerns if their boundaries are crossed. Employees in this context include management, permanent staff, project staff, students, interns, and receptionists, regardless of gender.

In the event of an incident, the management clearly communicates to the harasser that we do not condone the unwanted actions, and we expect the harasser to engage in a dialogue with both the management, the aggrieved party, and any relevant third parties. If the offending party holds a leadership position, they will be considered biased in the matter, so the rest of the leadership team will handle the case, and the person will be equal to all other employees.

Likewise, it must be unequivocally respected if colleagues or others express that an action is unwanted, even if the person committing the action perceives it as harmless.

Time is often a factor in recognizing behavior that crosses boundaries. Therefore, we acknowledge that the harassed party has the right to speak up at any time. This means that we do not have a statute of limitations for reporting incidents.

5.1. Witness to harassment



Similarly, employees who witness sexual harassment must ensure that they clearly speak up against the harasser and provide support to the aggrieved party. It is important for colleagues to collectively stand behind the affected individual and offer assistance in speaking up.

For further details, please refer to Section 7 of the policy.

5.2. External

If an employee experiences harassment from external parties, such as clients, architect collaborators located at the office, or partners (e.g., at construction sites), the employee has the right to involve their project manager or other leadership. Witnesses to the harassment should ensure they speak up and then inform their project manager, colleague, or leadership about the sequence of events.

Depending on the specific situation, the management may choose different measures, such as contacting the collaborating party to stop the harassment, terminating the partnership, or other actions such as reassigning the offending party.

Architectural collaborators who work regularly at CCO will be provided with this policy.

5.3. The process: what you need to do

If the harassment does not cease immediately when an employee speaks up, either the aggrieved employee or witnesses to the incident should reach out to either their immediate supervisor, the employee representative, or the occupational health and safety representative. The aggrieved party may also choose to confide in a colleague they feel comfortable with.

If you are unsure whether what you are experiencing qualifies as sexual harassment, please contact CCO's employee representative to discuss the situation and your experience. The employee representative (er) and the occupational health and safety representative (ohs) can be reached via email or in person to guide you on how to handle the situation.

Line Lange (er): <u>line.lange@cco.as</u> Kenneth Helmer (ohs): <u>kenneth.helmer@cco.as</u>

5.4. Psychological support can be arranged as needed and by appointment. The office is, of course, ready to assist if desired.

6. INTERVENTION AND FOLLOW-UP – WHO ASISSTS YOU?

If complaints or accusations arise as described in this policy, the management will ensure to intervene and facilitate the necessary dialogue, as well as plan a specific course of action for handling the situation while respecting all parties involved.



The process of involving the management:

(a) Initiating a dialogue with the employee who filed the complaint to obtain a detailed description of the incident, including who, where, and when the harassment took place.

(b) Presenting this description to the person the complaint is directed against in order to clarify whether they share the same perspective on the matter. The accused individual also has the opportunity to engage in a discussion to prevent similar situations in the future.

(c) In some cases, it may be necessary to involve any potential witnesses to clarify whether sexual harassment has occurred.

The management will strive to obtain both descriptions of the situation and process the complaint as quickly as possible while ensuring that all parties involved are entitled to a fair and objective treatment.

Both the management and all parties involved must maintain necessary discretion and protect the dignity and privacy of those involved, regardless of their roles and employment status.

If the offending party holds a leadership position, they will be considered biased in the matter, and the rest of the leadership team will handle the case following the points mentioned above.

Information about the case will not be disclosed to unrelated parties.

Based on how the case is presented and the available supporting documentation, the management will decide whether to impose employment-related sanctions, reassignments, and potentially provide psychological treatment if necessary.

7. WHAT SHOULD YOU DO IF YOU WITNESS OTHERS ENGAGING IN SEXUAL HARRASMENT?

If you witness sexual harassment in the workplace, it's important to take action.

First and foremost, it's crucial not to contribute further to the sexual harassment, such as by laughing along. Secondly, it's important to distance yourself from the harassment. For instance, you can refer to this policy, the office's general values, or the discussions about sexual harassment that take place during office meetings.

As a witness, you might only realize that the behavior is offensive after an incident has occurred. You should take action as soon as you become aware that an incident has taken place.

It's a good idea to have a conversation with the person who is being targeted by the harassment and ask them if their boundaries have been crossed. If this is the case, you can assist and support your colleague in reaching out to the employee representative, the occupational health and safety representative, or their immediate supervisor so that appropriate measures can be taken.

8. WHAT ARE THE CONSEQUENCES OF SEXUAL HARASSMENT?

Depending on the specific case, the management, in collaboration with the trade union and employer



organization, will determine whether the offending party should face employment-related sanctions, such as a written warning, reassignment, termination, or dismissal, among other possible actions.

The unique situation involving external parties is handled as described, where the aggrieved party has the right to inform both the management and project leadership about the sequence of events if customers, collaborators located at the office, or partners at locations such as construction sites engage in unwanted behavior. Witnesses should also speak up.

Depending on the specific situation, the management may choose different measures, such as contacting the collaborating party to halt the harassment, terminating the partnership, or other actions like reassigning the offending party.

If the offending party holds a leadership position, they will be considered biased in the matter, and the rest of the leadership team will handle the case according to the aforementioned guidelines.

Additionally, the aggrieved party may be offered reassignment or psychological assistance, depending on the situation.

False accusations of sexual harassment are also entirely unacceptable and can have employment-related consequences for those making such accusations.

BACKGROUND:

The Equal Treatment Act prohibits sexual harassment and defines it as discrimination.

According to Section 1, paragraph 5, harassment is defined as "any form of unwanted verbal, non-verbal, or physical behavior in relation to a person's gender," while Section 1, paragraph 6, states: "Sexual harassment occurs when any form of unwanted verbal, non-verbal, or physical behavior with sexual undertones is displayed" - and in both cases, "with the purpose or effect of violating a person's dignity, especially by creating a threatening, hostile, degrading, humiliating, or uncomfortable environment."

Source: Retsinformation (Legal Information).

This policy has been developed based on input from the Danish Industry and incorporates recommendations from Kvinfo (a Danish organization that works for gender equality).