

Group Anti-Harassment & Anti-Discrimination Policy

For an inclusive and respectful workplace

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Life Is On

Schneider
Electric

Policy name

Group Anti-Harassment & Anti-Discrimination Policy

Purpose

As stated in Schneider Electric's [Trust Charter](#), the Group Anti-Harassment & Anti-Discrimination Policy (the Policy) sets forth a zero-tolerance policy for harassment and discrimination.

Schneider Electric (the Company) is committed to providing a safe and respectful environment for all, free from all forms of harassment and discrimination.

Audience

This Policy applies to Schneider Electric and all operating companies and subsidiaries under its operational control worldwide.

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Confidentiality Status: Public

Local adaptation authorization

This Policy may be supplemented by local policies containing additional requirements or outlining local procedures related to investigations. It should be read in accordance with relevant local laws, which includes local anti-harassment or anti-discrimination laws. Local adaptations, when needed.

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1. Definitions

Workplace – Anywhere where Schneider Electric’s employees are conducting business and/or where they operate on the Company’s behalf.

- ➔ This Policy applies to any of our Workplaces worldwide.
- ➔ This includes, but is not limited to, conducting business in person on Schneider Electric premises, on the phone, virtually, or through email or other social media and/or during after-hours events such as, but not limited to, business meetings, dinners, trainings, and during work-related travel.

Employee – Any person working on the Company’s premises, including apprentices, temporary workers and trainees.

Harassment – Any offensive, inappropriate, unwelcomed, or even inadvertent behaviors at the workplace, that has:

- the effect and/or purpose of violating a person’s dignity or creating a degrading, humiliating or offensive/hostile work environment, or
- the effect and/or purpose of unreasonably interfering with an individual’s work performance, or
- an adverse effect on the individual’s employment opportunities.

The harasser’s intent (whether intentional or not) does not justify inappropriate behavior. Harassment occurs when the behavior is unwanted and/or objectionable or offensive to the recipient or witness to the conduct. Harassment also includes, for purposes of this Policy, sexual harassment.

Sexual Harassment – Unwelcome, non-consensual conduct of a sexual or sexist nature that has the effect and/or purpose of being offensive, degrading or humiliating. Sexual harassment can take many different forms and may include physical contact, comments or other behavior that could create a hostile working environment.

Discrimination – Unjustly or unfairly denying equal treatment or opportunity to individuals or groups with respect to the terms, conditions, or privileges of employment based on a personal characteristic, including any of the characteristics listed below in Section 3.2. This may include unfair treatment related to hiring, firing, promotions, training, scheduling, or compensation.

The definitions of Harassment, Sexual Harassment and Discrimination may vary according to local applicable laws.

2. What is an inclusive and respectful workplace?

“We want our employees - no matter who they are, or where they live in the world - to feel uniquely valued and safe to contribute their best.” - Jean-Pascal Tricoire, Chairman and CEO

Schneider Electric’s purpose is to empower all to make the most of our energy and resources, bridging progress and sustainability for all. We lead with inclusion and care; and strive to positively impact our people, our company, and our society, as stated in our Trust Charter.

Our Diversity, Equity & Inclusion ambition is to be one of the most inclusive and caring companies in the world, by offering equal opportunities to everyone, everywhere and ensure all Employees are uniquely valued and safe to contribute their best. We believe everyone, everywhere in the company deserves the same chance of success, and the right to bring their full and authentic selves into the workplace.

This Policy prohibits harassing or discriminatory conduct directed at anyone by anyone, including by our Employees towards other Employees, and covers conduct by or directed at applicants, vendors, contractors, business partners, or any other person working at Schneider Electric in any capacity or at our customers' or suppliers, including, but not limited to technical experts, sales team and office staff, and anyone with whom we do business. We do not tolerate such behaviors and make it visible and enforced to all.

All our Employees and stakeholders are responsible for contributing to a culture of respect at Schneider Electric, where everyone is psychologically safe to be their authentic self, free from harassment, bullying, discrimination, and retaliation of any kind. By building on the foundations of respect and trust, we create an open work environment that seeks out and embraces different perspectives.

Schneider Electric counts on the commitment and judgment of all Employees and stakeholders to apply these standards.

3. How to recognize potential misconduct?

3.1. What are the different types of Harassment?

The following types and examples provide a general description of potential situations of harassment. They do not constitute an exhaustive panorama of the various circumstances under which cases of harassment may arise and may vary depending on local applicable laws.

Type	Description	Examples
Bullying	<ul style="list-style-type: none"> • Use of aggression with the effect and/or purpose to harm or demean another Employee. • Can be constituted when the behavior becomes repetitive. 	Written, verbal, or physical act and/or communication, harming an employee or property, damaging someone's ability to work, or creating an unsafe work environment.
Sexual harassment	Unwelcomed sexual or sexist conduct (physical, visual, verbal or written) which has the effect and/or purpose of affecting an individual's dignity and creating an intimidating, hostile or uncomfortable working environment. It may be a pattern of behavior or a single occurrence. Sexual harassment may occur regardless of gender, gender identity, or gender expression and can be between same-sex or opposite-sex individuals.	<ul style="list-style-type: none"> • <u>Verbal manifestations</u>: words, advances, propositions, or requests for sexual favors. Vexatious comment or jokes against a person because of sexual orientation, self-identified or perceived sex, gender identity or expression. • <u>Written manifestations</u>: sending any type of written communication, including emails or text messages, with unwelcome or offensive sexual tone, requests, inquiries, jokes or advances. • <u>Visual manifestations</u>: leering, making sexual gestures, displaying offensive sexually suggestive objects or pictures, cartoons or posters, subtle or explicit demands for sexual favors. • <u>Physical manifestations</u>: unsolicited or unwelcomed actions including touching or assault.
Physical harassment (also called "violence")	Unwelcome and inappropriate physical conduct, or actions which has the effect and/or purpose of creating an unsafe and intimidating work environment.	Physical attack, humiliation and/or physical threat or assault in situations relating to work.
Discriminatory harassment	Unjustly or unfairly denying equal treatment to an individual or a group based on a personal characteristic.	When an objectionable or offensive conduct is demonstrated, based on a particular characteristic. Examples may include:

		<ul style="list-style-type: none"> • ethnicity: racial insults/jokes, hate symbols associated with a particular race/ethnicity. • religion: degrading comments or insulting jokes on religions, stereotypical religious comments. • gender: display of material (videos, pictures) degrading to any gender. • sexual orientation: jokes or degrading comments about an individual's sex or sexual orientation, exclusion of an Employee because of their sex or sexual orientation or expression.
Psychological harassment	<p>Psychological harassment means improper behavior, micro aggressions over a period, in a systematic or repetitive manner, involving physical behavior, spoken or written language, gestures or other acts that are intentional and may undermine the dignity or psychological integrity of any person.</p>	<ul style="list-style-type: none"> • Isolating or denying an employee's presence. • Discrediting or spreading rumors on someone. • Belittling someone's thoughts or work. • Repeated verbal abuse.
Verbal harassment	<p>Verbal harassment, or more generally, inappropriate, or demeaning verbal behaviors, micro aggressions.</p> <p>It can be generated through the tone that is being used. The way something is said can be as humiliating and demining as the words themselves.</p> <p>WARNING! Difference with conflict: A conflict does not necessarily constitute harassment. Disagreement and different points of view happen every day and are not necessarily detrimental. Whenever a conflict arises, employees have to resolve it in a respectful manner.</p>	<p>Threatening, yelling, insulting or cursing at an individual in public or in private.</p>
Digital harassment	<p>Malicious, demeaning and/or inappropriate communications or tones through online / digital communication tools.</p> <p>In addition, on internal and external social media, the following rules apply:</p> <ul style="list-style-type: none"> • As per Yammer Usage Policy, it is prohibited "to harass, abuse or harm another person, including sending unwelcomed communications to others using the community". • As per Social Media Policy: "Respect everyone - Respect your audience and their privacy, ensuring you are professional in your participation - Do not post content that could be seen as offensive, spam or inflammatory". 	<p>Online inappropriate and/or disrespectful communication (over digital devices like cell phones, computers, and tablets or through SMS, emails, Instant Messaging, and apps, in social media, forums, or gaming...).</p>

3.2. What are the different types of Discrimination?

Discrimination can occur:

- **Directly**, when a person or group is treated less favorably than another person or group in a similar situation because of an actual or perceived personal characteristic;
- **Indirectly**, when a requirement, condition or practice is imposed that has, or is likely to have, the effect of disadvantaging people with a personal characteristic protected by Schneider Electric, unless if such limitation is objectively justified by a legitimate aim and the means to achieve that aim are necessary and appropriate.

At Schneider Electric, all decisions regarding selection, hiring, promotion, compensation, career management and development, and all other terms and conditions of employment, are made without regard to personal characteristics, or any other prohibited grounds of discrimination under local laws.

Personal characteristics can include the following:

- a disability or temporary disability (including but not limited to: physical, cognitive, sensory or psychological disability)
- a disease or injury, including work-related injury
- parental status
- supposed race, skin color, descent, national origin, or ethnic background
- age, generation
- sex, including pregnancy, childbirth, or related medical conditions
- gender or gender identity
- membership to an industrial organization, like a trade union
- religion
- nationality, immigration status, citizenship, or ancestry
- sexual orientation
- marital status
- political opinion
- socio-economic background
- medical record.

This list is not exhaustive and may be supplemented by local law.

4. What are Employees' rights and responsibilities?

4.1. Employees

All Employees are entitled to:

- recruitment and career development decisions based on qualifications
- a workplace free from Harassment and Discrimination
- have fair and equal treatment and/or development opportunities
- voice concerns or complaints in good faith and in a respectful manner, through any reporting channels, as provided for below and as outlined in the Group Whistleblowing Policy (see section 6)
- psychological support, where applicable and appropriate

All Employees must:

- follow the standards of behavior outlined in this Policy and our Trust Charter, in particular treat everyone with dignity, courtesy, and respect. We believe "it all starts with respect" to create and maintain a safe and inclusive workplace
- offer support to people who experience Harassment and Discrimination, including providing information about how to make a complaint
- speak up if they observe or learn of behavior that may violate this Policy, even if they are not certain if a violation has occurred
- avoid malicious allegations and gossip and respect the confidentiality of case management

Harassment or Discrimination by non-Schneider employees

If a situation of Harassment and/or Discrimination is reported on a potential wrongdoer who is not a Schneider Employee, management will provide assistance to the potential victim and encourage reporting to the Trust line.

4.2. Human Resource Business Partners & Managers

As stated in our Trust Charter, Managers (both hierarchical and functional), as well as Human Resource Business Partners “*set the tone and exemplify our culture*”. As such, they are expected to:

- model appropriate standards of behaviors as per this Policy
- take steps to educate and make teams aware of their obligations under this Policy
- act fairly to resolve issues and enforce workplace behavioral standards
- take action when they become aware of inappropriate behavior, including timely reporting concerns about violations or potential violations of this Policy to the appropriate reporting channels (see section 6)
- ask questions and seek guidance from Human Resources, Legal Counsel, or a Regional Compliance Officer when issues or concerns arise
- implement and follow-up on the corrective actions in the case of a violation (see section 7)

5. How do we prevent misconduct?

Speak-Up Mindset:

Schneider Electric Employees must feel free and psychologically safe to share their ideas, opinions, and concerns without fear. The Company is committed to creating an atmosphere that makes people feel comfortable voicing doubts.

Make it applicable for all Employees, everywhere:

This Group Policy covers the various types of Harassment and Discrimination mentioned above, lists are not exhaustive and are deployed in each Region and/Country to adapt to local laws and policies.

Make it visible and shared to all:

We make our commitment visible, and we share awareness to our Employees and stakeholders to build further Schneider Electric’s integrity.

Embed expected behaviors in our performance management:

Schneider Electric Employees are expected to live up to and demonstrate respectful behaviors in the workplace, in line with our Core values (for all Employees) and Leadership Expectations (for Managers). Each year, our Employees are evaluated on the “how” they perform, as at Schneider’s, the “how” is as important as the “what”.

Grow Employees’ awareness through specific **training** modules, available to all Employees in the Responsible Workplace playlist on our training platform.

6. How do we address complaints?

Schneider Electric empowers Employees, contractors and external stakeholders to **speak up** without fear of harm, as they are our first line of defense.

Any person who believes in good faith that they have witnessed a violation of our Trust Charter, this

Policy and/or related law and regulations, or who becomes aware of such misconduct, is encouraged to report it through:

- the [Schneider Electric's whistleblowing system, Trust Line](#), which may be done anonymously (as per local law),
- a trusted Manager,
- Human Resources Business Partner,
- Legal Counsel,
- Regional Compliance Officer.

For jurisdiction-specific reporting options, see the Group Whistleblowing Policy or further guidance.

Schneider Electric takes all allegations of Harassment, Discrimination, and retaliation seriously and conducts, when applicable, prompt, thorough and confidential investigation. All concern submissions are handled impartially, respectfully and in respect of applicable laws by the Ethics & Compliance department.

The intent of the Policy is to deter conduct that is unwanted, unreasonable, and demeaning. Therefore, the Company may find a violation of the Policy even where the actions fall short of unlawful harassment under applicable law. The Company considers whether a reasonable person could conclude that the conduct created an intimidating, hostile, degrading, or demeaning environment.

IMPORTANT - Protection against retaliation: Schneider Electric strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith, or otherwise abusive reports (such as false or personal attacks aimed at specific individuals) are however prohibited and may result in disciplinary and/or legal action up to and including termination.

For more information, please consult the Group Whistleblowing Policy and the Case Management & Investigation Policy.

7. What are Company responses to Policy violations?

7.1. Disciplinary and corrective measures

Failure by an employee to comply with this Policy and/or applicable laws will result in corrective actions, disciplinary measures and/or legal action up to and including termination, as per the Group Whistleblowing Policy.

Corrective and disciplinary measures may include:

- Behavioral managerial development
- Verbal warning
- Written warning
- Internal action (change of role, etc.)
- Contract termination
- Other legal action

This list is not exhaustive. Sanctions are proportionate to the misconduct and may vary as they will be determined in full compliance with relevant applicable local labor laws and procedures (refer to the Case Management & Investigation Policy).

Mediator

To secure safe, respectful, and inclusive collaboration, Schneider Electric may propose intervention of an internal or external mediator to help rebuild respectful collaboration.

7.2. Remediation measures

In case of an alert and to protect our Employees' safety and ability to perform their best, Schneider Electric may offer the following set of remediation measures, with employee's consent (not exhaustive list):

- Safety measures (distancing)
- Temporary accommodations
- Flexible Time management and/or location
- Support for civil and penal actions
- Change of function/service (temporary assignment and/or change of reporting line)
- Internal or external mediation
- Psychological support, where applicable

8. Questions

If in doubt about any aspect of this Policy, Employees should seek advice from the Human Resources community or contact their Regional Compliance Officer. In addition, the Company has appointed Ethics Delegates as a further point of contact for Employees, internally to help them with any question about Trust Charter and Schneider Electric Policies. They are there to advice and talk about ethics dilemma.

Local law may establish a different mandatory standard or requirement related to workplace conduct, harassment and discrimination, and that standard or requirement will apply. Where there is inconsistency between this Policy and local laws (including the definitions of harassment and discrimination), local laws will apply unless this Policy provides greater protection.