



DISCRIMINATION & HARASSMENT POLICY





INTRODUCTION

The SFA Group strives to create a work environment that is free from discrimination and harassment and where all employees are treated with dignity, courtesy and respect.

SFA Group develops, protects and values the diversity of its work groups, which it considers an asset.

PURPOSE AND SCOPE

We have developed a policy on discrimination and harassment, provide employee training on discrimination and sexual harassment, and have procedures for complaints.

This policy applies to all employees:

- ▢ full-time, part-time, casual, permanent or temporary
- ▢ contract or commission workers
- ▢ volunteers, vocational and work experience placements

It applies to employees in all their work related dealings with each other, and with customers, contacts or clients.

Discrimination and equal opportunity

SFA Group is an equal opportunity employer. At all stages of the employment relationship (recruitment and selection, terms and conditions of work, training and professional development opportunities, promotion and transfer, retirement, retrenchment and termination) employees are treated on merit and valued according to how well they perform their duties.

SFA Group believes that all employees should be able to work in an environment free from discrimination, victimisation, harassment, vilification and the seeking of unnecessary information on which discrimination might be based. We consider these behaviours unacceptable and they will not be tolerated.

Responsibility of the employees

All employees contribute to maintaining a discrimination free and inclusive workplace and a healthy workplace culture.

Managers have a particular obligation to model appropriate behaviour; promote this policy; treat all complaints seriously and attend to them promptly; monitor the work environment and seek expert help for complex or serious matters.

All employees have the responsibility to comply with this policy; report incidents to their managers and not to participate in discriminatory or harassing behaviour.



Know your rights

Any discrimination based on any ground such as

- SEX
- RACE
- COLOUR
- ETHNIC OR SOCIAL ORIGIN
- GENETIC FEATURES
- LANGUAGE
- RELIGION OR BELIEF
- POLITICAL OR ANY OTHER OPINION
- MEMBERSHIP OF A NATIONAL MINORITY
- PROPERTY
- BIRTH
- DISABILITY
- AGE OR
- SEXUAL ORIENTATION

shall be prohibited.

These are called 'protected characteristics'.

Within the scope of application of the Treaty establishing the European Community and of the Treaty on European Union, and without prejudice to the special provisions of those treaties, any discrimination on grounds of nationality shall be prohibited.

This right is enshrined in article 21 of the Charter of Fundamental Rights.



Consequences of breach of the policy

Employees who make a complaint of discrimination or harassment will not be harassed by the SFA Group for making the complaint. This also applies to employees who agree to be a witness in a complaint or to make a complaint against them.

Disciplinary action will be taken by SFA Group against any employee found to have breached this policy. Action will be appropriate to the breach and may include: an official warning and note on the person's personnel file, a formal apology, counselling, demotion, transfer, suspension, or dismissal for very serious matters.

What is discrimination?

Direct discrimination happens when a person is treated worse than others in similar circumstances, because of one or more of their attributes.

There are four main types of discrimination

Direct discrimination

This means treating one person worse than another person because of a protected characteristic. For example, a promotion comes up at work. The employer believes that people's memories get worse as they get older so doesn't tell one of his older employees about it, because he thinks the employee wouldn't be able to do the job.

Indirect discrimination

This can happen when an organisation puts a rule or a policy or a way of doing things in place which has a worse impact on someone with a protected characteristic than someone without one. For example a local authority is planning to redevelop some of its housing. It decides to hold consultation events in the evening. Many of the female residents complain that they cannot attend these meetings because of childcare responsibilities.

Harassment

This means people cannot treat you in a way that violates your dignity, or creates a hostile, degrading, humiliating or offensive environment. For example a man with Down's syndrome is visiting a pub with friends. The bar staff make derogatory and offensive comments about him, which upset and offend him.

Victimisation

This means people cannot treat you unfairly if you are taking action under the Equality Act (like making a complaint of discrimination), or if you are supporting someone else who is doing so. For example, an employee makes a complaint of sexual harassment at work and is dismissed as a consequence.



What is harassment?

There are many types of harassment in the workplace. Harassment may consist of unwelcome or offensive behaviour that contributes to a hostile work environment. These can come from a co-worker, supervisor, boss, vendor or client that can cause an employee to feel uncomfortable or threatened, so let's take a closer look at the most common types of workplace harassment.

Physical Harassment

Physical harassment is one of the most common types of harassment at work. This can also come in the form of violence, both physically or to property. This can also be threatening behaviour. In its extreme, it can even be termed assault. An employee may be physically abused, such as pushing, punching or slapping, as well as other kinds of physical abuse. It can also involve a car, for example. One worker may damage the car (or motorbike or bicycle) by tampering, breaking, scratching or inflicting other kinds of damages.

Personal Harassment

Personal harassment can also be called bullying. The victim may be subjected to unwanted remarks, insults, offensive and derogatory statements. Being constantly put down with condescending statements can all be seen as personal harassment.

Discriminatory Harassment

This type of harassment in the workplace is directed at someone's race, age, sex or some other form of protected class who is subjected to offensive or intimidating remarks. People need to be really careful today. You can sometimes overhear someone say these kinds of statements in private conversations. Discriminatory harassments are particularly tricky to navigate, so it is best you get advice from an employment lawyer for their expertise and guidance.

Psychological Harassment

Sometimes, the harassment can be of a psychological nature and can have a negative impact on the victim. A victim is often put down, belittled or has to listen to needless condescending remarks that can affect him or her. These negative remarks can be aimed at the victim from both a professional as well as personal level.

Cyberbullying

Cyberbullying is also seen as harassment and it is done online. The person doing the harassing can make threatening statements to the victim or spread rumours on social media. This can then spread like wildfire. It can also get out of hand. Now, there is the possibility of others joining in and also harassing the victim (people who are not working in the same company). There have been instances when cyberbullying someone vulnerable has led to them taking their own life. While this may be rare and is also extreme, it has happened before.



Sexual Harassment

Sexual harassment is when the perpetrator behaves in a romantic or sexual way towards the victim who is clearly uncomfortable and does not want attention of this nature. There is also something known as Quid Pro Quo sexual harassment where the superior makes a sexual request to the victim and if not taken up, a threat of something negative happening is made, such as losing their job or not getting a promotion.

3rd Party Harassment

This type of harassment comes from someone who is not working as an employee in the company. These can include suppliers, vendors and even customers.

There are still other forms, such as verbal harassment, power harassment and retaliation harassment. All of this contributes to a toxic and hostile workplace. SFA Group will not tolerate harassment in the workplace or in any work-related context such as conferences, work functions and business trips.

Vicarious liability

Under the Act the person who discriminates against, victimises, sexually harasses, vilifies or asks for unnecessary information can be liable for the unlawful behaviour as well as their employer, SFA Group, unless SFA Group can show we have taken reasonable steps to prevent it.

SFA Group provides all employees with information about discrimination and harassment.

Managers must ensure that all employees are treated fairly and are not subject to any of the behaviours mentioned in this policy. They must also ensure that people who make complaints, or who are witnesses, are not victimised in any way.

What to do if you are discriminated against, harassed, vilified or asked for unnecessary information?

Don't ignore discrimination, sexual harassment, vilification or requests for unnecessary information, thinking it will go away, often it just gets worse. Choose the action you feel most comfortable with. You can follow more than one action at the same time.

Self help

If you feel confident and want to deal with the situation yourself, you can use self-help techniques. However, it is not necessary that you try to resolve the complaint this way.



This option involves approaching the person responsible for the discriminatory or sexually harassing behaviour yourself. You should tell the person what you are unhappy about, why you are unhappy about it, and what you would like to happen. Taking a person with you for support may be helpful.

Report internally

SFA Group has an obligation to treat all complaints of discrimination, victimisation, sexual harassment, vilification or seeking unnecessary information seriously. All complaints will be handled confidentially and impartially, investigated promptly and recommendations implemented.

The reporting of an alert through the internal channel can be brought, at your choice, to the attention of:

- your manager, his/her director
- your HR representative
- the local CSR representative
- the SFA Group Ethics Committee via e-mail ethics@sfagroup.com
- or the referent designated by the latter (internal or external).

1. When choosing your manager, tell them what your concerns are; explain what has happened and how it has affected you.

2. The manager may take immediate action (e.g. removing offensive graffiti or posters).

3. The manager may provide a range of options. One approach is to centre on the resolution of the issue, without deciding fault. The manager may speak to the person you are making a complaint about, to see if the situation can be resolved simply.

4. Some matters are not resolved so easily, especially if the person being complained about denies or disputes the allegations, or the issues are complex. Your manager (or another management team member if appropriate) may handle your complaint or refer it to specialist human resource employees or engage an independent external agency. This option will involve an investigation, collecting evidence and witness statements, and making findings and recommendations which will be implemented by SFA Group.



You can also report the incident via our reporting tool SpeakUp. This is our tool that allows you to report serious misconduct while guaranteeing complete anonymity if you wish. You can make your reports either by app or through a secure website, without having to go through a human operator.

Web SpeakUp :

Post a message using the SpeakUp web system
<https://sfagroup.speakup.report/sfagroup>

or

App SpeakUp:

use the app « SpeakUp by People Intouch »
and scan the QR Code to get started



Report it with SpeakUp

Policy review

All policies will be reviewed every two years, and distributed to all employees. Should the need arise, the policies will be translated into appropriate languages.

SFA Group is committed to providing an environment which is safe for all employees. You will not be disadvantaged in your employment conditions or opportunities as a result of lodging a complaint.

Date: 04.11.2022

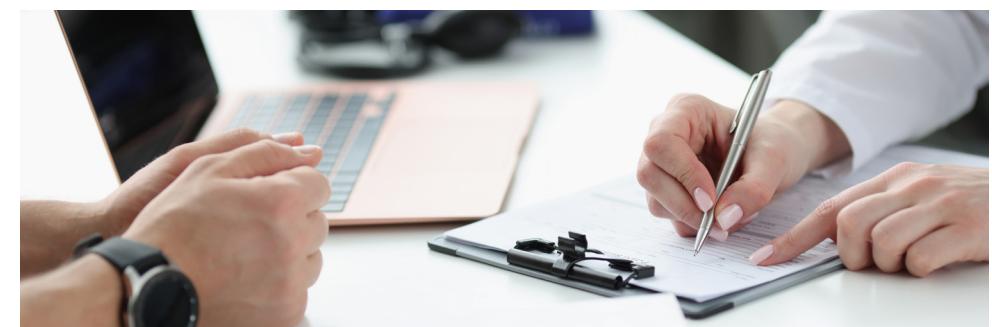
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arnaud corbier (Nov 7, 2022 08:52 GMT+1)

Arnaud CORBIER
CEO

Stéphane Harel

Stephane HAREL
Deputy CEO





ETHICS COMMITTEE

E-MAIL: ETHICS@SFAGROUP.COM

SFA GROUP
41 BIS AVENUE BOSQUET
FR - 75007 PARIS
TEL. : +33 (0)1 44 82 39 00
FAX : +33 (0)1 44 82 39 01

Signature: 

Email: sharel@sfa.fr