

WORKPLACE HARASSMENT POLICY

Introduction

River Group is committed to providing a safe and including working environment for all its employees free from discrimination on any ground and from harassment at work.

The Company operates a zero-tolerance policy for any form of harassment in the workplace and will treat all incidents seriously and promptly investigate all allegations of workplace harassment.

All complaints regarding any form of harassment will be taken seriously and treated with respect and trust. Such complaints are to be protected from retaliation. "Retaliation" means any consequential disadvantageous act, practice, omission or reaction to the employee's complaint. The Company shall closely follow up employees which have experienced any kind of harassment.

What is harassment?

River Group defines "harassment" as "actions, omissions and statements which have the purpose or effect of being demeaning, intimidating, degrading or humiliating". Sexual harassment is defined as "any form of unwanted sexual attention which has the purpose or effect of being demeaning, intimidating, hostile, degrading, humiliating or bothersome".

Examples of behaviour that could constitute harassment include:

- (i) Reprimands in front of others;
- (ii) Ridiculing or excluding someone;
- (iii) Withholding of necessary information;
- (iv) Persistent and unnecessary negative attacks on personal or professional performance;
- (v) Offensive comments or behaviour relating to the ethnic origin, physical characteristics or religion of an individual;
- (vi) Demeaning joking or teasing;
- (vii) Unwanted behaviour or attention of a sexual nature, this may be either physical or verbal.

It is important to remember that the impact the behaviour has on the recipient is the most important factor. It is therefore not so relevant whether the individual intended to cause offence, but rather that offence was caused by the conduct.

Handling of harassment

If you experience that you or other employees are subject to harassment you shall always seek help and/or whistle-blow in accordance with the Company's "Whistle-blowing policy". You may seek help from and/or whistle-blow to your immediate superior. If this is not possible or appropriate (e.g., because it is a matter concerning your superior), you may whistle-blow to the Company's official whistle-blowing channel or seek help from and/or whistle-blow to the employee representative, the safety representative or CEO of the Company. If this is not possible or appropriate, you may seek help from and/or whistle-blow to the chairperson of the board. The affected employee's immediate superior is responsible for following up the employee in the period after seeking help and/or whistle-blowing. The immediate superior shall assess appropriate measures to help the affected employee, including arranging contact with a psychologist, medical doctor or public authorities. In matters where it is impossible or inappropriate to involve the immediate superior, these duties apply to the employee representative, safety representative, CEO or chairperson of the board of the Company, depending on to whom the incident was reported.

If an employee of the Company has subjected the affected employee to the alleged harassment, the immediate superior shall contact the chairperson of the board to determine how the matter shall be investigated and brought forward.

Any personal information recorded in relation to the complaint that is deemed to be unfounded or any information unrelated to the complaint condition shall be deleted immediately.

Prevention of harassment

The Company shall work to prevent harassment. This implies that the Company, in cooperation with employees, shall map and assess work-related aspects that may cause harassment to occur. Based on this risk assessment, the Company shall implement necessary measures which reduce the risk of harassment.

Monitoring, review and update

The Compliance Officer of River Group, "Head of Operational Excellence", is responsible for monitoring compliance with these guidelines.