



EQUAL OPPORTUNITIES AND DIGNITY AT WORK POLICY

GLOBOFORCE PROPRIETARY & CONFIDENTIAL

OVERVIEW

At Globoforce, we strive to provide a supportive work environment, free from any type of discrimination, bullying or harassment. We are committed to implementing and promoting measures to protect the dignity of employees and to encourage respect for others at work. This policy sets out the guidelines that all employees must follow in order to support this commitment. This policy prohibits discrimination, bullying and harassment, as defined below, and other disrespectful behavior by any employee toward anyone else working in Globoforce including employees, temporary agency staff, contractors, consultants, suppliers, customers and any other customer contact. It applies to all employment practices including but not limited to recruitment, hiring, training, performance reviews, promotion, demotion, transfer, social and recreational programs, rates of pay or other compensation, benefits, educational assistance, layoff, termination or retirement.

This policy applies during normal working time in our premises and also at other work-related social events, training, conferences, business trips and other work-related activities, whether they take place on our premises or not and whether they take place during normal working hours.

This policy also extends to cyber bullying and harassment through social media or other electronic communications for both business and personal use, whether during office hours or otherwise. The policy applies regardless of whether the social media is accessed using our IT facilities and equipment or devices belonging to members of staff.

Every employee, especially those who manage other employees, has a personal responsibility for the implementation of this policy. Any queries about the application of this policy, or other questions, should be addressed to Kate Kidd, Senior Human Resources Manager or to your HR Business Partner.

NON-DISCRIMINATION

We are dedicated to promoting a professional and respectful atmosphere that supports equal employment opportunities and prohibits discriminatory practices. Equal opportunities means treating everyone equally on their merits, and not treating some unfairly or differently because of their gender, religious belief, marital or civil partnership status, family status, racial group, sexual orientation, disability, age or membership of the Travelling Community. It is not about giving some people preferential treatment at the expense of others. We all have a responsibility to create a working environment in which differences are respected and in which everyone – staff, clients and customers – is valued.

Equal Employment Opportunity

Globoforce is an equal opportunities employer. Our future success in a highly competitive world depends on our employees and the development of their skills and abilities. Applicants for employment and employees are reviewed on their individual qualifications for a position. Under no circumstances will we discriminate against qualified persons on the basis of gender, racial group, religious belief, sexual orientation, disability, family status, civil status, age or membership of the travelling community.

As an employer, we strive to achieve real equality of opportunity by continuously monitoring our employment practices to ensure they do not cause inequalities and by establishing consistent criteria for selection, training, promotion, redundancy and dismissal based on the needs of the business. We will continue to monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective.

This policy applies to the advertising of jobs, recruitment and appointments to roles, training,

promotion, conditions of work, pay and to every other aspect of employment. This policy also applies equally to the treatment of our customers. Employees involved in recruitment will be provided with training in relation to the application of this policy.

Employees should note that the imposition of a condition or requirement which has an adverse impact on someone or is more likely to affect someone because of his or her gender, religion, marital or civil partnership status, family status, racial group, sexual orientation, disability, age or having membership of the Travelling Community, will also be unlawful unless it can be justified on objective grounds. In all such situations the Human Resources Department should be consulted.

Employees who have a disability or who become disabled in the course of their employment may wish to advise Human Resources of their disability and of anything we can do which might assist them in the performance of their duties.

Complaints Procedure

Any member of staff may use the complaints procedure below to complain about discriminatory conduct. There should be no victimization of, or retaliation against, any person who makes a complaint of discrimination and any such victimization or retaliation may itself be the subject of disciplinary action, in accordance with Globoforce's disciplinary procedure.

Discipline

Any employee who discriminates against any other employee, supplier or customer on the grounds of gender, religion, marital or civil partnership status, family status, racial group, sexual orientation, disability, age or membership of the Travelling Community may result in disciplinary action, up to and including termination, in accordance with Globoforce's disciplinary procedure. In serious cases, such behavior will be deemed to constitute gross misconduct and, as such, may result in summary dismissal in the absence of mitigating circumstances.

BULLYING AND HARASSMENT

We aim to provide a work environment that is friendly, stimulating and respectful. As mentioned above, any form of bullying or harassment is inappropriate and will not be tolerated. All employees have a right to be treated with dignity and respect at work and not to have their safety, health or welfare put at risk through bullying or harassment by their employer, other employees, or others. Employees also have a responsibility in creating and contributing to a work environment free from bullying or harassment or from conduct likely to contribute to bullying or harassment. We expect that where an allegation of bullying or harassment at work is being investigated, employees will cooperate fully.

This policy aims to identify examples of unacceptable behaviour and provide a mechanism for dealing with complaints should they arise.

Bullying

Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by an individual or group against another person or persons, at the place of work and/or in the course of employment which could reasonably be regarded as undermining the individual's right to dignity at work.

A pattern of the following behaviours are examples of bullying:

- Exclusion with negative consequences
- Verbal abuse/insults
- Physical abuse
- Being treated less favourably than colleagues
- Intrusion – pestering, spying or stalking
- Menacing behaviour
- Intimidation
- Aggression
- Undermining behaviour
- Excessive monitoring of work
- Humiliation
- Withholding work-related information
- Repeatedly manipulating a person's job contents and targets
- Blame for things beyond the person's control

This list is not exhaustive. Isolated incidents of these behaviours may be an affront to dignity at work but they are not considered to be bullying.

Bullying at work does not include reasonable and essential discipline arising from the good management of the performance of an employee at work or actions taken which can be justified in relation to the safety, health and welfare of employees. For example, an employee whose performance is continuously below expectations may feel threatened and insecure in their work but this in itself does not indicate bullying.

Harassment

Harassment is any form of unwanted conduct related to any of the nine discriminatory grounds (gender, religion, marital or civil partnership status, family status, racial group, sexual orientation, disability, age or membership of the Travelling Community) which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. Harassment can take the form of acts, spoken words, requests, gestures, production, display or circulation of written words, pictures or other material which are unwelcome to the recipient and could reasonably be regarded as offensive, humiliating or intimidating. A single incident may constitute harassment.

Harassment may range from mildly unpleasant remarks to physical violence. The following are some specific examples of the forms such conduct might take:

- Verbal harassment - spoken words, shouting, jokes, ridicule, unfair or excessive criticism, comments or songs
- Physical harassment – pushing, shoving or any form of assault
- Written harassment – including production of faxes, text messages, emails or notices

- Intimidatory harassment – gestures, posturing or threatening poses
- Visual displays such as posters, emblems, badges or photographs
- Comments and items posted on social media
- Isolation or exclusion from social activities
- Pressures to behave in a manner which the employee thinks is inappropriate

These examples are not exhaustive, and offences of a similar nature are also prohibited and will be dealt with appropriately.

Sexual Harassment

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. A single incident may constitute sexual harassment. Examples of this type of harassment include unwelcome advances or requests for sexual favours, sexual gestures, displaying sexually suggestive objects, pictures, calendars, sending suggestive and pornographic correspondence including faxes, text messages or emails, unwelcome sexual comments and jokes, unwelcome physical conduct such as pinching, and unnecessary touching.

Other

The intention of the perpetrator of the sexual harassment or harassment is irrelevant. The fact that the perpetrator has no intention of bullying, harassing or sexually harassing the employee is no defence. The effect of the behaviour on the employee is what is relevant.

The protection of this policy extends to circumstances in which an employee is treated differently in the workplace because he/she rejected or accepted sexual harassment, for example in relation to decisions concerning access to training, promotion or salary.

Any other conduct which degrades, ridicules, threatens, intimidates or is physically abusive to an individual or group, or conduct which may lead to undue influence is also unacceptable behaviour and will not be tolerated. These examples are not exhaustive.

Appropriate disciplinary action may be taken in accordance with Globoforce's disciplinary procedure against any person who is found to have breached this policy and such action may include dismissal. All stages of the procedure for making a complaint under this policy will be handled fairly, sensitively, confidentially and with due respect for the rights of the complainant and the person complained about.

PROCEDURE FOR MAKING A COMPLAINT

Informal Procedure

In the first instance, an attempt should be made to address an allegation of bullying or harassment as informally as possible. Before considering taking action, the complainant may wish to discuss the matter in confidence with the Senior Human Resources Manager. It is often helpful to talk through the situation to clarify what the unwanted behaviour is, what the options are and how best to approach

the situation, with someone who is removed from it. In this situation, the contact person should listen patiently, be supportive and discuss the various options open to the employee concerned.

Any individual who feels that he/she has been harassed, sexually harassed, bullied or otherwise treated in breach of the policy should, if they can, immediately tell the individual responsible that the behaviour is offensive / unwanted and that he/she wants it to stop. In many cases the situation can be resolved simply by communicating this. If an individual finds it difficult to approach the individual whose behaviour is unwanted directly or continues to be subjected to such behaviour, they may choose to seek help and advice on a confidential basis from the Senior Human Resources Manager who will attempt to resolve the issue in an informal manner.

The contact person will establish the facts, the context and the next course of action which may include mediation or progressing to the formal procedure. An informal complaint can be verbal or written. If the complaint is verbal, a written note of what is complained of should be taken and a copy given to the complainant. Where resolution is found through the informal procedure, both parties will be given support or periodical reviews, as appropriate. These may include counselling or other appropriate interventions.

However, in the event that this informal method does not resolve the matter or the conduct complained of persists after the individual whose behaviour is unwanted has been informed of the perceived wrongdoing, formal procedures may be invoked. We recognise that every situation is different and the formal procedure may be more appropriate in some cases. Choosing not to use the informal procedure will not reflect negatively on a complainant in the formal procedure.

Mediation

Mediation can be a useful means of resolving complaints of bullying and harassment, where those complaints cannot be resolved informally. The objective of mediation is to resolve the matter speedily and confidentially without a formal investigation and with the minimum of conflict and stress for the individuals involved. Mediation requires the voluntary participation and co-operation of both parties in order to work effectively.

If both parties agree to participate in mediation, an assigned mediator will meet with both parties, usually separately to begin with, to discuss the alleged offending behaviour. The mediator will then bring both parties together to reach a common understanding and agreement on acceptable future behaviour. The objective is to reach an accommodation between the parties and thereby restore harmonious working relations. A mediated solution will not result in the issues being dealt with under the disciplinary policy.

Mediation may be attempted at any/all points in the procedure to try to resolve the complaint. If the mediation process does not produce a satisfactory outcome or the parties are not prepared to attempt mediation, the complainant may seek to have the matter resolved through formal investigation. Any information that emerges during the course of the mediation process remains strictly confidential and cannot be disclosed as part of the formal investigation.

Mediation may be attempted again during the formal investigation or following the outcome of the investigation.

Formal Procedure

At any time, whether or not informal action has been taken or mediation has been attempted, any

individual who feels that he or she has been harassed, sexually harassed, bullied or has otherwise been subjected to behaviour in breach of this policy, can raise a formal complaint with the Senior Human Resources Manager in writing.

The complaint should be specific to the precise details of the alleged incidents of bullying or harassment or other offending behaviour including the dates and names of witnesses, direct quotes where possible and the context in which the offending behaviour arose.

The alleged perpetrator should be notified in writing that an allegation of bullying or harassment or other offending behaviour has been made against him/her. He/she should be given a copy of the complainant's statement and be advised that they will have a fair opportunity to respond to the allegations.

Investigation Procedure

All formal complaints will be investigated by an appropriate person nominated by Globoforce (the "**Investigator**") who will determine the procedures to be applied to the investigation. The Investigator will meet with the complainant and the alleged perpetrator(s) and any witnesses or relevant persons on an individual confidential basis with a view to establishing the facts surrounding the allegation(s). The complainant and the alleged perpetrator will be entitled to be accompanied in meetings with the Investigator by a work colleague.

Confidentiality will be maintained throughout the investigation to the greatest extent consistent with the requirements of a fair investigation. All parties should continue to work normally, if possible during the investigation. However, we may at our sole discretion require either or both parties to remain away from their usual place of work or temporarily redeploy them at any stage of the investigation. On conclusion of the investigation, the Investigator will issue a written report (the investigation report) including a finding in respect of the allegations and a recommendation. Both parties will be provided with a copy of this report and given an opportunity to respond to the findings.

Outcome

Where a complaint is upheld, the alleged perpetrator(s) should be invited to a formal meeting to determine an appropriate course of action which may include, for example, training, counselling or mentoring of both parties or progressing the matter through Globoforce's disciplinary procedure. Serious breaches of this policy may result in disciplinary action up to and including dismissal. Where a complaint is not upheld, but the complainant is found to have acted in good faith, we will take appropriate measures to support both the complainant and the alleged perpetrator. This will include taking suitable steps to ensure that other parties to the investigation are made aware that the finding was not upheld.

Where a complaint is not upheld and is found not to have been made in good faith, the complainant may be the subject of disciplinary action, in accordance with Globoforce's disciplinary procedure. The same principle will apply for witnesses giving evidence in bad faith.

We will not tolerate any acts of retaliation or victimisation of the complainant or of anyone who cooperates in the investigation of a complaint or who is involved in the process at any stage. Any such victimisation or retaliation may itself be the subject of disciplinary action in accordance with Globoforce's disciplinary procedure.

Whether a complaint is upheld or not, we will monitor and follow up with both parties, to minimise the risk of bullying, harassment or another similar incident reoccurring in the future. Using this discrimination, bullying and harassment complaints procedure will not affect your statutory

rights.

Appeal

If the complainant or the person complained about is unhappy with the outcome of the procedure, either party can bring an appeal within seven calendar days of the receipt of the notification of the outcome, to a senior member of Globoforce who shall not have been involved in the investigation, detailing what they are appealing and why.

External Investigation

In any situation, where by reason of the size of Globoforce, the seniority of the complainant or alleged perpetrator, or for any other reason it is not appropriate for a complaint to be investigated by an employee of Globoforce, we reserve the right to appoint an appropriate external person to carry out the investigation. Any such external person will carry out the investigation in accordance with this policy.

REVIEW

This policy will be kept under regular review. This policy is non-contractual and Globoforce reserves the right to amend any part of this policy.