

# CODE OF CONDUCT

Adopted 2024-05-08 by the board of directors

In today's global environment, companies are an important part of the process of creating sustainability and enhancing ethical business conduct. Image Systems is very supportive of these efforts and encourages this development. For Image Systems, to be a responsible company means to behave ethically in all aspects of business, to care for the environment, to set good examples in the way we act towards each other as employees and the way we treat our business partners, and to always respect laws and regulations wherever we do business. Image Systems is highly dependent on the international market, and also on gaining support from its domestic customers. To be successful there is a clear requirement that we are, and are perceived as, a reliable partner to our customers wherever they are.

We must also be able to recruit the best skills and resources available to maintain our position as a world-class technology company on the international market. This can only be done if Image Systems is a company where sustainability and integrity are high on the agenda, a company of which we all feel proud to be a part. Last but not the least we must ensure there are no doubts whatsoever among our shareholders and other stakeholders that we are setting, and working with, the highest standards in respect of business integrity and promotion of sustainable society.

The Code of Conduct sets out Image Systems's ethical standards in a number of areas. All employees must be familiar with and live up to these standards. It is the top level of a framework, which also includes detailed policies and directives for those who are more directly affected than others in a specific area.

Every Image Systems employee, without exception, has a personal role to play in maintaining Image Systems's reputation as a responsible company. I am committed to fostering a working environment where you feel that you can raise any issues, without fear of retaliation. This commitment shall be upheld by all levels of management. We are what we do.



Today Image Systems is a publicly listed tech company with operations and customers throughout the world. The common factor for all of Image Systems's business dealings is that they are based on trust. All our stakeholders rely on Image Systems as a long-term partner. This trust can only be maintained if the business is run responsibly and sustainably. That is why responsible business and sustainability are issues with a specific place on the board's agenda. This Code of Conduct captures the principles that should govern Image Systems's business. They are based on universal values such as integrity, transparency, and accountability. By following these principles, we ensure that Image Systems's operations are characterized by good business ethics and are conducted with respect for others, while also safeguarding sustainable development. The Code of Conduct has been adopted by the board and responsibility for compliance rests with all of us. That is how we earn the trust that forms the basis for our business.

The Members of the Board of Directors of Image Systems AB (publ)



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## **1. INTRODUCTION**

### **Why a Code of Conduct?**

Image Systems is a company with subsidiaries acting under in the international arena and we, as Image Systems employees, all carry with us the Image Systems brand and the respective subsidiary brands in our daily operations. Our vision and values can only be fulfilled if we all understand that we must represent the company in a way that meets high ethical standards. This way we will gain respect on the market and in the societies where we are active, and we will create a working environment that is attractive to us as employees.

One of Image Systems's core values is Professionalism. By that we mean that we are honest and reliable, and that we keep our promises. By following the standards and principles of this Code of Conduct, we will demonstrate in practice what this value means to the company and to us as employees.

### **What is covered by the Code of Conduct?**

The Code of Conduct is based on the ten principles of the UN Global Compact. It is a summary of the standards and principles of conduct expected of all employees. It does not, however, cover all aspects of behavior. There will always be areas where we need to use our judgment as individuals. The Code of Conduct is supplemented by more detailed policies and directives in defined areas. It is our responsibility as employees to know when to go further in our Quality Management System to get information about the detailed policies, directives and standards.

### **Company commitments**

The board of directors and management of the company and its employees must commit to these standards and principles. Acts in violation of the Code of Conduct may cause damage to the company's reputation and may lead to legal actions against the company and employees. They may also be a breach of the terms of employment, which are based on confidence and loyalty, and may lead to labor law actions.

#### **Seeking advice**

We will inevitably be confronted with complex situations where we feel we do not get a clear answer from the Code of Conduct or through the Quality Management System. When this is the case, we expect employees to discuss the matter with their nearest superior or to seek advice directly from the CEO.

## **2. THE REGULATORY FRAMEWORK**

We follow laws and regulations.

Image Systems has operations in a number of jurisdictions and is represented in many more. We are responsible for understanding and following local laws and regulations in the countries where we are present or do business. In the event that these are less



restrictive than our own standard, we shall always apply the Image Systems standard unless other instructions are given.

### **3. ZERO TOLERANCE AGAINST CORRUPTION**

#### **We compete fairly and honestly**

We are firm believers in free enterprise and in fair competition on a level playing field. This system is protected and promoted by competition law. We always conduct our business in compliance with antitrust laws and other laws that regulate competition.

#### **We work to prevent corruption and corruptive practices**

Image Systems applies zero tolerance for corruption. This means that we must not under any circumstances be engaged in, encourage or tolerate bribery through payments or other benefits to public officials or private sector employees with the aim of obtaining or retaining business or any other advantage. We are aware of the risk that payments to market intermediaries may be used to improperly influence business decisions. We are committed to preventing this by implementing and adhering to requirements and procedures in our operations that are consistent with best practice.

#### **We do not offer improper gifts or hospitality**

Moderate and reasonable gifts and hospitality which are customary in business are normally acceptable if given for the right reason, i.e. demonstrating Image Systems' products and services, improving the image of the company or establishing cordial business relations. We shall however be aware that even customary gifts and hospitality may be inappropriate in connection with forthcoming or ongoing business negotiations and we always pay attention to our customers' integrity policies. We shall not offer gifts or hospitality of a value or nature or under circumstances that may be seen as an attempt to improperly influence business decisions or obtain other improper advantages. Openness, transparency and correct recording are key elements to demonstrate compliance with these requirements.

#### **We do not accept improper gifts or hospitality**

As Image Systems employees we must always be, and be seen as, impartial and professional when dealing with others. From this it follows that we shall only accept gifts and hospitality offered by others if they are reasonable in relation to the business in question and if they are within the boundaries of customary business behavior. Gifts and hospitality of high value or of unusual or unethical nature shall not be accepted. If you are in any doubt if you as a Image Systems employee should accept a specific gift or participate in an event, you must seek advice from your superior or directly from the CEO.

#### **We avoid conflicts of interest**



We shall always keep personal interests apart from company business. Decisions by or for the company must never be influenced by personal preferences or relationships. We shall always seek to mitigate the risk of conflicts of interest.

#### **4. OUR WORKPLACES**

##### **Our workplaces are safe**

Image Systems shows commitment to health and safety and works to eliminate accidents, illnesses and injuries. We see it as our duty to protect each other's health and safety and to help each other create a sound working environment. We do not tolerate any form of harassment, bullying or other offensive physical or verbal treatments. It is a common task to ensure that the working environment is safe, both physically and psychologically.

##### **Diversity is a basis for successful business**

We firmly believe that workplaces characterized by diversity establish a solid foundation for greater creativity and innovation. We shall work actively to make Image Systems more diversified at all levels of the company because it is a basis for successful business.

##### **Discrimination is prohibited**

Our decisions on hiring, promotion, development and compensation are based on the employees' abilities and skills related to the job and must never be based on irrelevant factors, such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation. As employees we shall conduct our work with respect for all people regardless of differences.

##### **The right to form and act through trade unions is fundamental**

We respect all employees' right to form or join a trade union and the right to collective bargaining. Representatives of trade unions must not be subjected to improper discrimination. Image Systems gives trade union representatives access to trade union members and their workplaces.

##### **We respect privacy**

We respect the fundamental human right of privacy. Personal information must be obtained correctly and lawfully, be relevant for the purpose for which it has been obtained and be treated with utmost care.

##### **We strive to create a performance driven culture**

We assess the performance of our employees based on their achievement of individual targets in line with the business plan and the values expressed in this Code of Conduct.



## **5. INFORMATION AND USE OF COMMUNICATION MEDIA**

### **We protect information as a valuable asset**

Information about the company is internal or confidential, unless publicly released through annual reports, press releases, product descriptions, storytelling or other similar material intended for public use. We shall not share information with others outside the company unless there is a business reason to do so. Company information of a technical, commercial or marketing character is of a particularly proprietary and sensitive nature. This information may also include inside information. The use and distribution of such information shall be on a need to know basis. Image Systems employees entrusted with such information must be familiar with the confidentiality requirements and procedures as regards such information, and always ensure that the company's interests are preserved. Information shall always be assessed according to its value to ensure that it is given the proper protection level.

### **Information systems are our work tools**

We use information systems professionally and as a means to continuously increase efficiency in our work processes. The company's communication tools must never be used for any unlawful or unethical purposes. Limited private use of company communication tools is acceptable if restricted to handling personal matters that do not interfere with work. When we communicate using an information system associated with the company we always, regardless of method, represent the company. This means that we shall act respectfully and correctly, and always be conscious of the fact that our messages may be used for purposes other than those intended. We are cautious in handling restricted information and third party proprietary information. We treat information obtained from others in the same way as we expect them to treat information received from us, and in accordance with terms applicable to its disclosure. We do not try to access or accept receipt of proprietary information from others, unless the owner has agreed to its release. Proprietary information that is accidentally received shall not be disseminated but instead be returned to its owner. We must always be aware of our customers' regulations for protecting information for national security or export control reasons. We often need substantial amounts of information to be able to support our customers' needs. We must however never seek to collect any information not legitimately authorized for release or disregard the conditions applicable to its disclosure to us.

### **Communication with the media**

Only the CEO and representatives appointed by the CEO are authorized to speak on behalf of Image Systems in the media, including any form of social media



## **6. IMAGE SYSTEMS – A COMPANY LISTED ON THE STOCK EXCHANGE**

### **We adhere to the stock market rules**

Image Systems is listed on Nasdaq Stockholm. Image Systems as a listed company and we as employees must comply with all applicable stock market laws and regulations in order to maintain the shareholders' and the general public's trust, as well as Image Systems's reliability in the financial market.

### **We inform in a structured way**

Image Systems's communication with all stakeholders such as shareholders and the financial market, shall be correct, relevant and clear, and not misleading. We shall maintain an active and non-selective dialogue with all stakeholders to ensure that their perception of Image Systems is correct. When information is deemed share price sensitive, we inform all stakeholders simultaneously through press releases. Only authorized Image Systems spokespersons are permitted to speak on behalf of Image Systems and to comment on disclosed information.

### **We do not allow misuse of inside information**

Inside information is information that is not public and is likely to significantly affect the price of the Image Systems share. Typical inside information is financial results and major orders. In order to preserve the general public's confidence in the financial market and to ensure trading on fair terms, the use and handling of inside information is strictly regulated. The use or disclosure of inside information for an employee's own financial or other benefit not only violates the Code of Conduct, it may also be a violation of the law and constitute a crime. For Image Systems employees with access to inside information, it is illegal to trade in Image Systems shares, or other Image Systems securities, or to influence someone else to do so. It is also illegal to disclose inside information to other people (including family and friends) or entities outside the company. This applies to everyone regardless of your position in the company and whether or not you appear on the insider list described below. Disclosure of inside information to a Image Systems co-worker shall be on a need to know basis only and the recipient shall be made aware of the inside nature of the information. It may not always be clear whether certain information is considered inside information, so, if in doubt, always seek the advice directly from the CEO. Image Systems is obliged to keep an insider list of employees and others who have access to inside information. Anyone with access to inside information but who is not registered on the insider list should contact his or her superior or directly the CEO for registration.



## **7. ENVIRONMENT**

### **We care for the environment**

Wherever we act, we shall contribute to sustainable development. This means that we shall reduce environmental risks and minimize our footprints in the environment. Caring for the environment is a natural part of Image Systems's daily business and environmental requirements. We participate in international co-operation and research projects to support the development of green technologies and resource efficiency. Knowledge is an important factor in order to be successful in the environmental work. We expect that you as a Image Systems employee actively seek information about the environmental impact of our operations and products and consider ways of reducing environmental risks and our environmental footprints in any business or activities you come across.

## **8. WHISTLEBLOWING**

### **Whistleblowing means being loyal to company values**

The Code of Conduct is an essential part in creating a group-wide culture of responsibility and commitment to Image Systems's values. You are encouraged to report any conduct that you believe to be a violation of laws or the Code of Conduct. Please be aware that the information you provide or the allegations you make could have serious consequences for other employees. You are therefore urged to provide only information that is accurate to the best of your knowledge. Reports that cannot be substantiated will not justify further investigation or review. Reports should normally be made to your manager. Where you feel that is not appropriate, or where your concerns have not been adequately addressed, you may report to a superior manager, directly to the CEO or to any of Image Systems's directors of the board.

Image Systems board has decided for a special channel for whistleblowing:

[whistleblow@imagesystems.se](mailto:whistleblow@imagesystems.se)

Any e-mail send to this address will be handled by the Whistleblowing committee of Image Systems, which is part of the Audit committee.

Regardless of which reporting channel is used, confidentiality will be maintained to the fullest extent possible, and we guarantee that your comments will be heard. No one shall ever be discriminated or punished for reporting in good faith any suspected or observed violations of the law or of the Code of Conduct. Image Systems actively supports whistleblowers and is committed to protecting personal data in accordance with applicable laws.



## **9. APPENDIX A: THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT**

Corporate sustainability starts with a company's value system and a principled approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. By incorporating the Global Compact principles into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success. The UN Global Compact's Ten Principles are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

### **1. Human Rights**

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### **2. Labor**

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

### **3. Environment**

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### **4. Anti-Corruption**

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



## **10. APPENDIX B: GUIDELINES/ACTION PLAN FOR MANAGING DISCRIMINATION AND SEXUAL HARASSMENT**

it is important that the industry takes care of the work environment and health of all its members in order to create conditions for a pleasant work environment, employee participation and a sustainable working life.

Everyone who works within our industry has the right to be treated with respect and to work in an environment that is free from discrimination, harassment, sexual harassment, and victimization. Such behavior must never be accepted as it constitutes serious threats to people's health, wellbeing, job satisfaction and opportunities to succeed.

The purpose of this document is to clarify the meaning of discrimination, harassment, sexual harassment and victimization, and the responsibilities and actions to take if someone behaves inappropriately in these aspects.

All managers, employees, trainees, consultants and agency staff at Image Systems group must adhere to the rules set out in this appendix.

### **Definitions**

Discrimination, harassment, bullying, ostracism, dominant behavior, victimization – there are many different terms within this sensitive area. The terms and the definitions that are used in this appendix are primarily based on the Swedish Discrimination Act and the Swedish Work Environment Authority's provisions regarding Organizational and social work environment (AFS 2015:4).

Discrimination, harassment, sexual harassment and victimization should not be confused with temporary conflicts, differences of opinion or difficulties in cooperation existing in most workplaces. However, such problems can quickly escalate and become a cause of discrimination, harassment, sexual harassment and victimization. Hence, it is important that even minor conflicts are dealt with as quickly as possible to prevent this from happening.

### **Discrimination**

An employer may not discriminate against employees, job applicants, students on work experience placements, trainees or agency workers. The meaning of discrimination is that someone has been disadvantaged by being less favorably treated than someone else, or by the application of a rule or provision that might otherwise appear to be neutral. The disadvantaging of a person may also be connected to one of the grounds for discrimination (please see the definitions below). Discrimination can also refer to a person having been disadvantaged through failure to take reasonable measures to



prevent harassment, or failure to take reasonable measures to improve accessibility for someone with a disability.

The seven grounds for discrimination are defined as follows:

- Sex: a woman or a man; this also covers persons who intend to change or have changed the sex they belong to (e.g. transsexuals)
- Transgender identity or expression: a person with a gender identity or gender expression that differs from their assigned sex.
- Ethnicity: an individual's national and ethnic origin, skin color or other similar circumstance.
- Religion or other beliefs: religious convictions or convictions based on grounds that are comparable to religion, for example Judaism, Islam, Christianity, Buddhism and Atheism. Please note that ethical, philosophical or political opinions are not protected by the Swedish Discrimination Act.
- Disability: permanent physical, mental or intellectual limitation of a person's functional capacity that, as a consequence of injury or illness, either existed at birth, has arisen since then or can be expected to arise (e.g. impairment of vision or hearing, autism, allergies, epilepsy, paralysis or MS)
- Sexual orientation: homosexual, bisexual or heterosexual orientation
- Age: length of life to date

There is also a need for a hierarchical difference between the person guilty of discrimination and the person being discriminated against since some form of disadvantaging is required in order for discrimination to exist from a purely legal perspective. In other words, it is only a person with the possibility to disadvantage someone else who can be guilty of discrimination. It is always the employer who is the responsible party in relation to discrimination cases. Discrimination could, imply, eg, that someone doesn't receive a pay increase due to pregnancy, that someone doesn't get invited to a job interview because their name doesn't sound Swedish, or that no attempt is made to adapt the workplace on the basis of someone's disability.

### **Harassment**

The term harassment is used in relation to behavior that violates someone's dignity and is connected to one of the grounds for discrimination, in the Swedish Discrimination Act. For example, it could be a case of someone being ridiculed, disparaged, subjected to insulting generalizations or being called something condescending. Harassment might also involve the concealing or withholding of information, with such behavior being connected to one of the grounds for discrimination. The common denominator of different forms of harassment is that they cause a person to feel insulted, threatened, offended or badly treated. The same behavior that is perceived by one person to be



harassment, might not necessarily offend another person at all. It is the recipient who determines what constitutes an unwelcome behavior.

### **Sexual harassment**

Sexual harassment is harassment that is of a sexual nature. It could involve touching, groping, sexually explicit jokes, inappropriate proposals, looks and gazes, jargon or images that are sexually suggestive. Sexual harassment is not the same as mutual flirtation - sexual harassment is unwelcome and undesirable. It is always the recipient to sexual harassment who determines what constitutes as unwelcome and undesirable behavior.

Hereafter, the term “harassment” is used to cover both harassment and sexual harassment.

### **Negative consequences**

An employer may not subject a job applicant, employee, trainee or agency worker to negative consequences when reporting a misconduct or participating in an investigation based on the Discrimination Act.

### **Victimization**

Just like harassment, victimization is a form of behavior directed at one or more employees in an offensive manner. The difference is that victimization does not have any connection to the grounds for discrimination or actions of a sexual nature.

### **Preventive measures in the workplace**

It is both important and a statutory requirement for the employer to implement preventive measures aimed at reducing the risk of discrimination, harassment and victimization. No individual should have to suffer such behavior and treatment. Furthermore, unresolved, long term problems risk to negatively affect the stress tolerance in the group, which in turn could lead to a ‘scapegoat mentality’. Goal-oriented, preventive measures contribute to a good work environment, which in turn leads to a workplace that promotes good health and a working life that is sustainable in the long term. Hence, it is important to work systematically with preventive measures aimed at improving the work environment and promoting equal treatment.

### **Managing perceived harassment and victimization**

If the employer becomes aware that a manager, employee, trainee or agency worker feels that they has been subjected to harassment or victimization, the employer has an obligation to investigate the matter and, where applicable, to take the measures that can reasonably be required in order to prevent the same thing from happening again. However, everyone has a responsibility to react and speak up if someone else is behaving in an unacceptable manner.



Victimization or threats from suppliers/subcontractors/business partners or other external parties

If someone has been subject to harassment or victimization by a person outside the workplace, but in a work-related situation, the employer must take measures such as informing that person's employer to ensure that it will not happen again.

### **If you are a manager**

If you are a manager and you become aware that another manager or an employee, trainee or agency worker feels that they have been subjected to harassment or victimization, you must investigate the matter without delay.

The exact nature and scope of an investigation can vary from case to case, but one fundamental aspect is that you must always interview the complainant. You must also interview the subject of the allegation unless the complainant has expressed a clear desire to remain anonymous. You may also need to interview any witnesses. If you reach the conclusion that harassment or victimization has taken place, you are obligated to take measures to prevent it from happening again. This applies regardless of whether the complainant wishes to remain anonymous or not. However, if the complainant does wish to remain anonymous, you should ensure that the measures you implement are not aimed at individual persons. In the first instance the measures should be of a more general nature to avoid the risk of pointing out one particular individual.

Examples of general measures are training sessions for the employees, or discussions in a workplace meeting regarding standards and how people should treat each other. (Make sure you also conduct a follow-up discussion at a later date). Measures aimed at individuals are primarily intended to get the person to apologize and to understand why certain actions or certain types of behavior have been perceived to be offensive. Secondly, or if the offensive behavior is recurring, it may be necessary to initiate labor law measures such as a written warning, relocation or termination of employment. Other types of necessary measures may include revision of work organization, for example whether there are indications that the behavior has to do with a widespread work environment issue.

### **Checklist for managers**

- Start by listening to the complainant and take notes of what has happened and what he/she says (it could be helpful to use the attached template). It is important to inform the complainant that everything discussed during the meeting will be treated confidentially, and that it is always the complainant who decides what (if any) information should be passed on to others. Show empathy and treat the person with respect. Provide information about what the applicable rules and regulations say and go through the alternatives available for the continued investigation. If the person wishes to remain anonymous, and you don't feel that



it is absolutely necessary to speak with the subject of the allegation, be clear that the measures you will be taking can only be of a general nature. No measures may be taken in relation to the person who has suffered the offence. Document the information you have provided to the complainant and what you have agreed upon in terms of the process going forward.

- If the complainant wishes to be open about his/her experiences, you also have to speak with the subject of the allegations. When speaking to the subject, you must inform him/her of the complaints and listen to his/her perspective. At this stage of proceedings that you may also need to interview any witnesses. Document everything that has been said. (You might find it helpful to use the attached template during these interviews.)
- If your assessment is that harassment or victimization has occurred, you must address the matter to the subject of the allegation and explain to him/her that this kind of behavior is not acceptable and must cease immediately. The subject of the allegation must apologize to the complainant. In many cases the above measures are sufficient to put a stop to unacceptable behavior. You must document all measures taken.
- If it is your assessment that further measures are needed in relation to the subject of the allegations, eg some form of training or labor law measures, you must prepare an action plan for how you intend to proceed. We recommend that you use the attached template. You must also consider what help you might need from your own manager, the HR department or an occupational health specialist.
- Make sure you maintain regular contact with the complainant, even if he/she is absent on sick leave. It is important to show this person that you are committed to resolving the problem and that he/she is needed in the workplace as a valued member of staff.
- Document the dates and times of your contact with the complainant, as well as details of any agreements you reach with him/her.
- If you have prepared an action plan, follow up on it to ensure that all necessary measures have been taken.

### **If you are the victim of harassment or victimization**

If you feel that you have been subjected to harassment or victimization, you ought to report the matter to your manager, your manager's manager or the HR function in your workplace. It is your perception that constitutes unacceptable behavior. However, according to Swedish law, the harasser must be made aware that his/her behavior is unwelcome. This can be done verbally, in writing or with the help of someone in whom you have confidence. If, however, the harassment is blatantly obvious, there is no need for you to say anything to the person in question since the behavior is already classified as harassment in the eyes of the law.



### **Checklist for the victim of harassment or victimization**

- Be clear in telling the other person that their behavior is unwelcome and unacceptable. Leave no room for doubt or misunderstanding.
- Write down the details of what has happened. Make a note of dates, times, any witnesses present, what the person said and did, how that made you feel, what you were thinking at the time and how you reacted.
- Report to your immediate manager, to his/her manager or the HR function.
- Report to your trade union representative, workplace safety officer or someone else you trust. You should not suffer any negative consequences when reporting a misconduct or participating in an investigation based on the Discrimination Act.
- If you feel that you have been subjected to negative consequences due to your reporting, you must turn to your manager's manager or the HR function.

### **If you are the colleague of a victim of harassment or victimization**

Try to speak up if you feel that someone in your workplace is harassing others or behaving in such a manner that they run the risk of offending others. If someone who has suffered harassment or victimization tells you about their experience, the best thing you can do is to remind them how important it is that they contact their manager (or their manager's manager or HR) to report the incident.

### **Checklist for the colleague of a victim**

- Speak up if you feel that someone in the workplace is behaving inappropriately towards others.
- Listen to what your victimized colleague tells you about what has happened.
- Show your support, for example by offering to accompany them when they report to their manager.

### **Managing perceived discrimination**

Employees who have been subjected to, or who become aware of the existence of, perceived discrimination must report this to their manager or their manager's manager. The employer must follow the same procedure as with harassment.

If not resolved, the complainant can contact Discrimination Ombudsman (DO).

### **To whom can you turn?**

- Your manager
- The HR function in your workplace



- Your manager's manager and/or another high-level manager
- The Work Environment Officer or Health and Safety Officer (see the Staff Handbook for contact details)
- The Swedish Work Environment Authority ([www.av.se](http://www.av.se))
- The Discrimination Ombudsman ([www.do.se](http://www.do.se))



## Template for managing perceived harassment and victimization

(Save this investigation, but in a manner that ensures that it cannot be accessed by unauthorized persons)

Date:

Present during the interview:

Description of the incident:

Persons who were present when the incident took place:

When the incident occurred:

Persons who saw what happened (witnesses):

Description of the event or events:

Proposed measures:

Measures taken:

Responsible for the measures:

Date for planned follow-up:

Signature - manager

Signature - employee