



Vodafone NZ Policy

Bullying and Harassment Prevention

Working at Vodafone

<p>Objective</p> <p>At Vodafone, treating people with respect and behaving in ways which contribute to a safe and positive working environment for all employees is important to us. Everyone has the right to a safe working environment free from bullying and harassment.</p> <p>This policy explains what we class as bullying and harassment and how concerns of this nature are investigated and dealt with.</p> <p>Please be aware that the definitions in this policy are over and above those in the Code of Conduct.</p>	<p>Policy Owner</p>	<p>HR Director Antony Welton</p>
	<p>Policy Champion</p>	<p>Head of HR Centres of Expertise Jan Bibby</p>
	<p>Version/Date</p>	<p>November 2015</p>

Scope and Compliance

This policy applies to all Vodafone NZ employees, consultants, contractors and agency staff.

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1 Policy

Bullying and harassment can have a serious impact both for employees and for Vodafone, in terms of productivity and success. We are committed to providing a healthy, safe, supportive and positive work environment, where everyone is respected and behaves professionally towards each other. Vodafone will not tolerate any form of bullying or harassment in the workplace.

All Vodafone NZ employees, consultants, contractors and agency staff are expected to:

- Treat their colleagues with respect
- Behave in ways that contribute to a safe and positive workplace
- Be understanding of people's differences
- Report any behaviour which they genuinely consider to be a breach of this policy

In addition to this, Vodafone people leaders are expected to:

- Lead by example and build a respectful work environment
- Encourage their team members to talk through any issues which may be considered bullying or harassment (where appropriate)
- Treat any complaint seriously and act promptly to get it resolved

Bullying

Bullying is repeated and unreasonable behaviour which is directed at an employee or group of employees that creates a risk to their health and safety and/or has a detrimental effect on that employee or group of employees:

- Repeated behaviour is persistent and can involve a range of actions over time
- Unreasonable behaviour is behaviour that a reasonable person in the same circumstances would consider to be victimising, humiliating, intimidating or threatening

Generally, bullying will be intentional, with the aim of gaining power and dominance over another person and/or causing fear and distress to that person. However, bullying can also be unintentional, where although the perpetrator's actions are not intended to cause fear or distress, they have (and it is reasonable to expect that they could have) this effect.

Examples of bullying can include:

- Put downs, belittling comments, persistent criticism
- Public humiliation, teasing and taunting
- Intimidation e.g misuse of power, threats of violence or against job security
- Exclusion, isolating or ignoring
- Verbal abuse, shouting or yelling
- Behavior that happens face to face, by email or text message, online or by other social media channels

Bullying is not:

- One-off or occasional instances of forgetfulness, rudeness or tactlessness
- Setting high performance standards
- Constructive feedback and genuine peer review
- A reasonable request from your manager
- Undertaking a disciplinary process in line with Vodafone's policies
- A single incident of unreasonable behaviour, but incidents should be addressed to avoid escalation



Harassment

Harassment is where one person directs behaviour at an employee including watching, loitering, following, or accosting them, interfering with their property or acting in ways that causes them to fear for their safety. To be considered harassment, the behaviour must either be repeated, or of such a significant nature that it is humiliating, offensive or intimidating to an employee and creates a risk to their health and safety and/or has a detrimental effect on their performance at work.

Generally, harassment will be intentional, but it can also be unintentional, where although the perpetrator's actions are not intended to cause humiliation, offense or intimidation, they have (and it is reasonable to expect that they could have) this effect.

Examples of harassment can include:

- Preventing or hindering access to the workplace
- Persistent following, watching, loitering near, or accosting an employee
- Giving offensive material to an employee, or leaving it where it will be found by, given to, or brought to their attention
- Perpetrating and circulating persistent and malicious gossip about an employee
- Interfering with an employee's property

Harassment (including sexual and racial harassment) is not:

- Behavior based on mutual attraction, including the development of relationships
- Occasional and appropriate compliments on a person's appearance
- Appropriate performance management and feedback

Sexual Harassment

Sexual harassment is language, visual material or physical behaviour of a sexual nature which is unwelcome or offensive to an employee, and which is either repeated or so significant that it has a detrimental effect on the employee's employment, job performance or job satisfaction.

Examples of sexual harassment can include:

- Unwelcome sexual advances or physical contact
- Sexually-oriented remarks or abuse
- Offensive gestures or comments
- Promise of preferential treatment or threat of detrimental treatment in return for sex
- Use of pictures/posters/videos of a sexual nature
- Persistent and unwelcome social invitations, phone calls or emails at work or home

Sexual harassment also occurs if a person directly or indirectly asks an employee for sexual intercourse, sexual contact, or another form of sexual activity, and their request contains an implied or overt promise of preferential or detrimental treatment, or an implied or overt threat about their present or future employment status.

Racial Harassment

Racial harassment is unwelcome language, visual material or physical behaviour that directly or indirectly expresses hostility against, brings into contempt, or ridicules, an employee on the grounds of their race, colour, ethnicity or national origin, which is offensive or hurtful to the employee and which is either repeated or so significant that it has a detrimental effect on that person's employment, job performance or job satisfaction.



Examples of racial harassment can include:

- Jokes, remarks, insults, songs, innuendos or direct comments about cultural differences, ethnic origin or race
- Name-calling or deliberately mispronouncing names
- Making fun of the way people dress, speak or look relating to their ethnic origin
- Offensive material
- Threatening behaviour based on cultural differences, ethnic origin or race

Behaviour that is connected with Vodafone may be considered bullying or harassment, even where it takes place outside of the workplace.

2 Process

What should you do?

Vodafone will support anyone who has a genuine complaint of bullying or harassment. If a complaint is made, we will act promptly, investigate the matter fully, and treat the matter seriously and in confidence. Where bullying or harassment is found to have occurred, this may lead to disciplinary action being taken about the person (or people) complained about. See the Disciplinary and Dismissal Policy for more information.

Anyone making a complaint of bullying or harassment will be protected from any retaliation, victimisation or discrimination from either the person (or people) they are complaining about, or anyone else at Vodafone. Engaging in this kind of behaviour against a person complaining of bullying or harassment may also lead to disciplinary action. However, if a dishonest or malicious false complaint is made, then disciplinary action may be taken against the complainant. If you feel that you have experienced any form of bullying or harassment it is important that you raise your concerns as soon as possible after the behaviour of concern occurs. There are a number of ways you can deal with this.

Informally:

- If you feel comfortable to do so, speak directly to the person whose behaviour is causing the problem
 - Focus on their behaviour – don't make it personal
 - Be as specific as possible and give examples of the behaviour that is causing you concern
 - Explain why the behaviour is unwelcome and ask for it to stop. Often the person may not know their behaviour is causing distress and will stop immediately once told
 - Be firm and confident - not aggressive or confrontational
- Talk to someone you trust (a manager or a colleague or use the Employee Assistance Programme) about your concerns. This can also help give you an objective viewpoint on the behaviour you have experienced
- Speak to your manager. If appropriate, your manager may facilitate an informal meeting with you and the person whose behaviour is of concern to discuss the issue and agree a way forward
- If the person whose behaviour is causing you concern is your manager, you should discuss your concerns with their manager

Formally:

- If you have tried to resolve the bullying or harassment informally and it has failed to stop, or if you feel the matter requires urgent escalation, you should make a formal complaint to your manager (or your manager's manager), or to your HR Business Partner. A formal complaint should be made in writing,



outlining your specific concerns and who they are regarding. Where possible you should outline dates of the incident(s) and examples of inappropriate actions/behaviours, whether anyone else witnessed the behaviour and any supporting information

- Alternatively, you can also raise the issue through Speak Up, our independent and confidential external hotline on 0800 837 732. See the Hub for more information on Speak Up. Please note that if you choose to make a bullying or harassment complaint through Speak Up, you may choose to remain anonymous, however this may mean we cannot fully investigate your concerns.
- Upon receipt of a formal complaint, a meeting will be arranged with an appropriate manager and/or a HR Consultant to discuss your concerns and agree the next steps, which may include a full investigation into the allegations
- If a full investigation is conducted, the details of the complaint will be provided to the alleged bully/harasser and they will be given the opportunity to respond to the allegations
- All issues raised will be taken seriously and will be handled confidentially, as far as possible, and in a timely way

3 Manager's Guidelines

To assist managers in taking a consistent approach to bullying and harassment matters, a manager's toolkit is available on MyHR.

Vodafone will ensure all employees have access to current policies and are clear about behavioural expectations. Clear documentation relating to bullying and harassment investigations (including file notes with dates, times and details of related conversations) is important so that everyone knows what is expected, and to justify action taken in respect of bullying and harassment.

4 Breach of Policy

Breach of this policy may result in disciplinary action up to and including dismissal. For more information on the disciplinary process please see Disciplinary and Dismissal Policy.

5 Further Support and Information

Employee Assistance Programme Support

For support in relation to any bullying or harassment concerns, you may wish to contact Stratos, Vodafone's Employee Assistance Programme (EAP) provider. EAP is 100% confidential, available 24hours/day and employees can receive three counselling sessions free of charge. The cost for any further sessions may be approved by HR. You can contact a counsellor from the EAP programme by calling (09) 538 0261 or by going to their website www.stratos-ltd.co.nz/index.php and logging in using the details:

Company name: vodafone
Password: 01

For further guidance on this policy, please contact AskHRNZ.

6 Document History

Vers.	Date	Changes	Other standards affected	Approved by
1.0	16/07/2015	Updated template and amendments to policy		HR Director & Legal Director



1.1	02/11/2015	Updated to reference Disciplinary & Dismissal Policy		
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