



C-TECH IMPLANT SRL
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POLICY ON PREVENTION, COUNTERING AND ELIMINATION OF HARASSMENT AND VIOLENCE IN THE WORKPLACE

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1. PURPOSE AND SCOPE OF APPLICATION

By means of this document, in accordance with and as a supplement to its Company Regulations and Charter of Values (Gender Equality Policy), C-Tech Implant S.r.l. ("C-Tech" in this document) reaffirms its commitment to respecting the fundamental rights of individuals and maintains zero tolerance towards any form of violence or harassment in the workplace, whether on the part of its own personnel during the performance of work activities, or on the part of suppliers, sub-suppliers or partners. C-Tech expresses its commitment to supporting an inclusive, equitable, supportive, multicultural, respectful, authentic and diverse work environment, free from any form of harassment, violence and sexually inappropriate conduct, as understood in accordance with the glossary of definitions contained in Annex 2 to this document.

This Policy promotes activities for the prevention, countering and elimination of all forms of abuse in implementation of the regulatory requirements of Law No. 4 of 15 January 2021, ratifying and implementing ILO Convention No. 190 of 2019 on the elimination of violence and harassment in the world of work, given that such conduct "represents a threat to equal opportunities and is unacceptable and incompatible with decent work". C-Tech commits to upholding the principles set out in this document with respect to all those who, in any capacity and regardless of the type of contractual relationship, contribute to the achievement of the company's aims and objectives and participate in the company community. Protected Persons are persons who work for C-Tech, persons in training, including trainees and apprentices, and candidate persons entering C-Tech's selection process.

This Policy is coordinated with the Procedure for the Management of Reports – Whistleblowing (hereinafter the "Whistleblowing Procedure"), adopted by C-Tech Implant S.r.l. in implementation of Legislative Decree of 10 March 2023, No. 24. Reports relating to episodes of harassment or violence in the workplace are managed exclusively through the Whistleblowing channel, which constitutes the sole internal reporting channel adopted by the Company. Management is



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entrusted to the Gender Equality Committee, to which reference is made for the applicable methods, timeframes and protections.

It is noted that, should the Company adopt an organisational, management and control model pursuant to Legislative Decree 231/2001, the management of reports will be divided between the Supervisory Body and the Gender Equality Committee in accordance with the provisions of the Whistleblowing Procedure, to which reference is made.

2. General Principles

The Policy is founded on the following essential principles:

1. C-Tech Personnel have the responsibility to collaborate in creating a work environment based on respect, to support those who report violent, harassing or personally harmful conduct or episodes, and to cooperate in the related investigative activities.
2. All persons in positions of responsibility have the duty to promote a culture that counters violence and harassment in the workplace, by monitoring compliance with this Policy and disseminating its principles in observance of the preventive measures in place.
3. No forms of violence or harassment of an intimidatory or coercive nature are permitted, whether committed in the exercise of one's functions or carried out by taking advantage of one's position of organisational responsibility.
4. It is not a necessary condition that a hierarchical relationship exist between the victim and the perpetrator of the conduct in order for harassment and violence to be so qualified. Acts of violence and harassment may indeed be carried out between employees of equal standing, as well as by or towards a party external to the Company.
5. Reports must be made in good faith and without fear of retaliation. No form of retaliation, whether direct or indirect, against the reporting person for reasons connected to the report will be tolerated. The specific anti-retaliation protections



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provided for by Legislative Decree 24/2023 apply to all reports made through the Whistleblowing channel, to which this Policy refers in its entirety.

6. Any act of retaliation or secondary victimisation against reporting persons or witnesses is prohibited.

7. Protected Persons have the right to confidentiality. Information reported and emerging during any fact-finding phase conducted by the competent company management will be handled with strict respect for the principles and applicable legislation on privacy protection and, more generally, the contractual and legislative provisions governing employment relationships.

The Company promotes a culture aimed at encouraging C-Tech Personnel to adopt, towards those who suffer harassment or violence, an approach free from prejudice, capable of overcoming stereotypes and erroneous perceptions, both individual and collective, in order to create a work environment in which people can feel protected and free to report harmful episodes in a confidential and safe manner.

3. Prevention and Promotion of a Culture Based on Respect

C-Tech commits to establishing programmes for the countering and prevention of violence and harassment in the workplace, within which hazards and risks, measures and objectives are assessed, in line with applicable internal regulatory instruments. Prevention, monitoring and cultural promotion measures must be adequate and proportionate to the respective level of company oversight and must include measurable objectives. Personnel must be informed, made aware and trained on the contents of the Policy and the applicable legislation in this area, as well as on their shared responsibility in promoting a work culture based on mutual respect and personal dignity. To this end, C-Tech ensures that the contents of the Policy are included in the training and information programmes delivered to all C-Tech Personnel. Participation in such training activities constitutes proper fulfilment of the contractual employment obligation.



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4. Reporting

Personnel are invited to report episodes of violence or harassment in the workplace of which they become aware, by following the reporting channels set out below. The Procedure also provides for the establishment within the Company of safe and confidential reporting channels for employees and, in general, for those making the report, as well as the adoption of appropriate measures to protect the worker who has suffered abuse, violence or harassment and to prevent further occurrences. Anyone who believes they are the subject or witness of the inappropriate conduct described in this Policy may initiate a report through the Whistleblowing channel, which constitutes the sole internal reporting channel adopted by C-Tech Implant S.r.l., accessible from the dedicated section of the company website. Upon the explicit request of the reporting person, the report may also be made orally, through a direct and confidential meeting with the Gender Equality Committee, to be scheduled within a reasonable timeframe from the request. In such case, the content will be formally recorded and signed by the reporting person. Anonymous reports are also permitted, provided they are sufficiently detailed and accompanied by elements that allow for the conduct of adequate investigative activity, in accordance with the provisions of the Whistleblowing Procedure. For the detailed content of the report, the procedural timeframes, the reporting person's protections and the prohibition of retaliation, reference is made in full to the Whistleblowing Procedure.

5. Management Procedure

The receiving Gender Equality Committee evaluates the report, initiates the appropriate activities to ascertain the veracity of the facts and — where it deems there to be a serious risk of the harassing conduct continuing or recurring — adopts, together with HR Management and Company Management, the



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appropriate emergency measures. The management process ensures equitable protection for both the reporting person and the reported person. All information relating to the investigation is stored in compliance with applicable legislation on privacy protection and the rules governing employment relationships. The procedural timeframes, methods for archiving documentation, the management of conflicts of interest within the Committee, and the reporting person's protection measures are governed by the Whistleblowing Procedure, to which full reference is made.

At the conclusion of the investigation, one of the following situations may arise:

a) The report relating to the act of violence or harassment is deemed unfounded on the basis of the evidence gathered during the investigation. In such case, the reporting person is notified of the outcome. Without prejudice to the provisions of the Whistleblowing Procedure regarding the Committee's right to request supplementary information during the investigation, the re-opening of the proceedings on the basis of elements that the reporting person could have provided during the investigation is not permitted. Reports made in bad faith, with instrumental or defamatory intent, may give rise to disciplinary action against the author, without prejudice to the provisions of the Whistleblowing Procedure regarding the forfeiture of protection measures in cases of established criminal or civil liability on the part of the reporting person.

b) The act of violence or harassment that is the subject of the report is found to be substantiated and verified. The Gender Equality Committee, in accordance with the provisions of the Whistleblowing Procedure, communicates the outcome to the Company Management and the competent functions, proposes the applicable disciplinary measures pursuant to the applicable collective bargaining agreement, and adopts all measures necessary to restore a work environment compatible with the dignity of the person who has suffered the abuse. The perpetrators of conduct qualifying as violence or harassment will be subject to



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disciplinary sanctions. Sanctions are imposed taking into account, among other things, the severity of the infringement, the nature of the conduct carried out, any recurrence thereof, and the hierarchical relationship between the perpetrator of the act of violence or harassment and the victim of the abuse. In the case of conduct carried out by parties holding a quasi-subordinate or self-employed work contract with the Company, or in the context of labour supply or service provision arrangements in favour of the Company – depending on the circumstances – the Company will intervene directly in the existing professional relationship or will notify the employers of workers external to the Company.

Reports relating to episodes involving Third Parties who do not fall within the scope of application of the Whistleblowing Procedure are managed directly by HR Management, which ensures their confidential and timely handling.

6. Communication, Review and Updating of the Document

C-Tech commits to giving maximum dissemination to the Policy and to Gender Equality initiatives with respect to all relevant stakeholders, primarily through communication channels attributable to the company – such as the company's Internet and Intranet sites and social media channels – and through conduct both within and outside the company.

For the purposes of integrated monitoring, the Gender Equality Committee includes the reports received pursuant to this Policy in the annual anonymised statistical report provided for by the Whistleblowing Procedure, distinguishing between reports pertaining to the area of harassment and violence in the workplace (UNI/PdR 125:2022) and those falling within the scope of Legislative Decree 24/2023.



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Regulatory Framework

Principal Regulatory Sources

- Italian Constitution, which recognises and protects the fundamental rights of citizens, including the principle of equality (Article 3), which enshrines the principle of equality;
- Law 300/1970 (Workers' Statute), which establishes the fundamental principles of workers' rights and includes provisions on non-discrimination in the workplace;
- Law No. 125/1991 (Positive Actions for the Achievement of Male-Female Equality at Work);
- Legislative Decree No. 196/2003 and subsequent amendments (Protection and Processing of Personal Data);
- Legislative Decree No. 198/2006 and subsequent amendments (Code of Equal Opportunities between Men and Women), which also transposes EU directives on gender equality;
- Legislative Decree No. 81/2008 and subsequent amendments (Consolidated Law on Health and Safety at Work), which underscores the importance of ensuring an inclusive, safe and discrimination-free work environment;
- Law No. 4/2021 ratifying and implementing International Labour Organisation Convention No. 190 on the elimination of violence and harassment in the world of work;
- Law 162/2021 on gender equality and the related Reference Practice UNI/PdR 125:2022, which defines the minimum parameters to be met in order to obtain gender equality certification.



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Other Regulatory References

- Collective bargaining agreements (CCNL) applied at C-Tech;
- WEPs: Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template), UN Global Compact and UN Women (2010);
- Interconfederal Agreement of 25 January 2016 – "Framework Agreement on Harassment and Violence in the Workplace", signed by Confindustria and the trade union organisations;
- INAIL Guidelines – "Recognising in Order to Prevent Phenomena of Harassment and Violence in the Workplace" (2021);
- The 10 Principles of the UN Global Compact, with particular reference to Principles 1 to 6 promoting respect for Human Rights and Labour Rights;
- United Nations Guiding Principles on Business and Human Rights (UNGPs), the related Gender Dimensions and the related Manifesto "Business for People and Society";
- OECD Guidelines for Multinational Enterprises;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- Universal Declaration of Human Rights of the United Nations, 1948;
- United Nations Conventions on the rights of women, the elimination of all forms of racial discrimination, the rights of the child, and the rights of persons with disabilities;
- Declaration on Fundamental Principles and Rights at Work and the ten Core Conventions of the International Labour Organisation (ILO);
- Recommendation 92/131/EEC on mobbing and harassment in the workplace;
- Charter of Fundamental Rights of the European Union (or Charter of Nice) 20/12/2000;



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- Directive 2000/43/EU combating discrimination on grounds of racial or ethnic origin;
- Directive 2000/78/EU combating discrimination;
- Resolution A5-0283/2001 on the implementation of policies for the prevention of mobbing in the workplace;
- Charter of Equal Opportunities;
- Directive 2002/73/EU and Directive 2006/54/EU, both on equal treatment of men and women in matters of employment and occupation;
- European Framework Agreement on Work-related Stress, 08/10/2004;
- Treaty of Lisbon 13/12/2007 – "Charter of Fundamental Rights";
- Istanbul Convention of the Council of Europe, 11/05/2011, on combating and preventing violence against women;
- Victims' Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime;
- UN 2030 Agenda for Sustainable Development (2015): SDG 5 on gender equality, SDG 8 on decent work and SDG 10 on reducing inequalities;
- International Labour Organisation Convention No. 190/2019 and related Recommendation No. 206/2019 on the elimination of violence and harassment in the world of work.

Internal Regulations

- Company Regulations
- Charter of Values (Gender Equality Policy)



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Glossary

Protected Persons: C-Tech personnel, regardless of their contractual status, persons in training including trainees and apprentices, workers whose employment relationship has ended with respect to episodes occurring during the period in which they worked for C-Tech, and candidate persons entering the selection process. Third Parties – understood as subsidiary or associated companies, partners, clients, suppliers, professionals and other categories of external parties – are also considered Protected Persons.

Reporting Person: the natural person who makes the report or public disclosure of information on violations acquired in the context of their work.

Witness: a person who has knowledge of the facts, either because they were present or because they were informed by a victim of violent or harassing conduct in the workplace.

Definitions

Violence and Harassment in the Workplace

Pursuant to Article 1 of Convention No. 190 on the Elimination of Violence and Harassment in the World of Work, ratified by Law of 15 January 2021, No. 4:

[For the purposes of this Convention:

a) the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether occurring on a single occasion or repeatedly, that aim at, result in, or are likely to result in



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physical, psychological, sexual or economic harm, and includes gender-based violence and harassment;

b) the term "gender-based violence and harassment" means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.]

Pursuant to Article 3 of the European Framework Agreement on Harassment and Violence at Work of 26/04/2007:

[(Description)

Harassment and violence stem from unacceptable behaviour by one or more individuals and can take various forms, some of which are more easily identifiable than others. The work environment can influence people's exposure to harassment and violence. Harassment occurs when one or more individuals are repeatedly and deliberately subjected to abuse, threats and/or humiliation in a work context. Violence occurs when one or more individuals are assaulted in a work context. Harassment and violence may be perpetrated by one or more superiors, or by one or more workers, with the purpose or effect of violating the dignity of the person, of harming their health and/or of creating a hostile work environment.]

Pursuant to the INAIL Guidelines 2021, Recognising in Order to Prevent Phenomena of Harassment and Violence in the Workplace:

[(Definitions)

Harassment in the workplace: unwanted conduct carried out for reasons connected, even partially, to sex, that has the purpose or effect of violating the dignity of a worker and of creating an intimidatory, hostile, degrading, humiliating or offensive environment (Legislative Decree 198/2006, Article 26, paragraph 1). It



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constitutes an aggravating circumstance when sexual harassment is accompanied by implicit or explicit threats or coercion by hierarchical superiors or persons who may otherwise influence the establishment, conduct or termination of the employment relationship.

Workplace violence: refers to "incidents" in which personnel are abused, threatened or assaulted in circumstances related to work, including commuting to and from work, with explicit or implicit consequences for health, safety and well-being (World Health Organisation).

Mobbing: systematic and prolonged conduct, carried out by one or more parties against a worker in the work context, manifesting itself through acts, behaviours or omissions with the purpose or effect of damaging the worker's professional and personal dignity, of isolating them from or excluding them from the work environment.]

Gender-Based Violence

Pursuant to Article 1 of the United Nations Declaration on the Elimination of Violence against Women (20/12/1993):

[For the purposes of this Declaration, the term "violence against women" means any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life.]

Pursuant to Article 2 of the United Nations Declaration on the Elimination of Violence against Women (20/12/1993):

[Violence against women shall be understood to encompass, but not be limited to, the following:



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b) Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced prostitution; ...]

Gender-Based Harassment

Pursuant to Article 26, paragraph 1 of the Code of Equal Opportunities (Legislative Decree of 11 April 2006, No. 198):

[Harassment is also considered discrimination, namely unwanted conduct related to the sex of a person with the purpose or effect of violating the dignity of a worker and of creating an intimidatory, hostile, degrading, humiliating or offensive environment.]

Sexual Harassment

Pursuant to Article 26, paragraph 2 of the Code of Equal Opportunities (Legislative Decree of 11 April 2006, No. 198):

[Sexual harassment means unwanted conduct of a sexual nature and any other type of discrimination based on sex, expressed in physical, verbal or non-verbal form, with the purpose or effect of violating the dignity of a worker and of creating an intimidatory, hostile, degrading, humiliating or offensive environment.]

Pursuant to Article 1 of the Code of Conduct of 21 January 2022 – Against Sexual Harassment in the Workplace and for the Protection of Personal Dignity, for personnel of the prison administration and juvenile and community justice:



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[(Definition) Sexual harassment is defined as any form of manifestly unwanted, inappropriate or offensive conduct of a sexual nature experienced by the recipient, expressed physically, verbally or non-verbally which, in itself or by reason of its persistence, causes offence to the dignity and freedom of the person and/or is liable to create a climate of intimidation and discomfort for that person within the work environment.]

Pursuant to Article 3 of the Code of Conduct of 21 January 2022 – Against Sexual Harassment in the Workplace and for the Protection of Personal Dignity, for personnel of the prison administration and juvenile and community justice:

[(Examples) By way of illustration and without limitation under the said definition, the following acts or conduct constitute sexual harassment in the workplace:

- a) gestures or sexual innuendo perceived as offensive and unseemly;
- b) unwanted sexual attention that is inappropriate and offensive to the recipient;
- c) implicit or explicit requests for unwanted sexual favours;
- d) written conduct and verbal expressions that are denigrating and/or offensive towards a person on grounds of their belonging to a particular gender or by reason of their different sexual orientation;
- e) display in the workplace of pornographic and/or personally demeaning material or material offensive to the image of women, including in electronic format;
- f) unwanted physical contact;
- g) threats or retaliation following the refusal to receive sexual attention;
- h) extortion of sexual favours in exchange for benefits, privileges, career advancement or other advantages.]