



ANTI-DISCRIMINATION, HARASSMENT AND BULLYING POLICY

1 PURPOSE

Octave is committed to maintaining a respectful, inclusive and professional work environment in which individuals are treated with dignity and fairness.

The aim of this Anti-Discrimination, Harassment and Bullying Policy ("Policy") is to set out Octave's expectations for workplace conduct and to prohibit unlawful or unfair discrimination, harassment, sexual harassment, discriminatory harassment, or bullying.

This Policy should be read together with [Octave Code of Business Conduct and Ethics](#) ("the Code"), [Octave Supplier Code of Conduct](#) ("Supplier Code"), applicable law and any binding local requirements. If there is a conflict with applicable law or any binding local requirement, such law or binding local requirement will prevail. Otherwise, these documents should be interpreted consistently.

2 APPLICABILITY

This Policy applies to all directors, officers, employees and third parties acting on Octave's behalf ("Personnel"). For the purposes of this Policy, "Octave" means Octave Intelligence plc, its subsidiaries, and joint ventures over which Octave exercises management control.

This Policy also applies, where relevant, to work-related interactions with applicants for employment, customers, suppliers, vendors, business partners, contractors and other third parties.

This Policy applies to conduct that affects the workplace or working relationships, whether it occurs:

- a) at an Octave office or worksite;
- b) during business travel, work events, training, conferences or social events connected to work;
- c) through electronic communications, including email, messaging tools, collaboration platforms, social media, voicemail, text messages, the internet or Octave systems; or
- d) outside normal working hours, where the conduct has a sufficient connection to Octave, the workplace or working relationships.

3 POLICY STATEMENT

Octave does not tolerate unlawful or unfair discrimination, harassment, sexual harassment, discriminatory harassment, or bullying.

Personnel are expected to act with integrity, professionalism, dignity and fairness in all work-related dealings with colleagues, applicants, customers, suppliers, vendors, business partners and other third parties.

Personnel must not engage in conduct that violates this Policy, whether directly, indirectly, in person, online or through third parties.

Managers and supervisors have an important role in promoting a respectful workplace. They are expected to lead by example, remain attentive to workplace conduct within their teams, and take appropriate steps to escalate concerns where they become aware of conduct that may be inconsistent with this Policy.

Octave will review reported concerns and may take appropriate corrective or disciplinary action where this Policy has been breached, subject to applicable law and contractual rights.

4 DISCRIMINATION

Octave is committed to equal opportunity and to maintaining a workplace free from unlawful or unfair discrimination.

Discrimination means treating a person less favourably, or subjecting a person to disadvantage, in a work-related context on the basis of a protected characteristic or other ground protected by applicable law.

Protected characteristics may include race, colour, ethnic or social origin, nationality, ancestry, sex, gender, pregnancy, marital status, family or caring responsibilities, sexual orientation, gender identity, gender expression, age, disability, medical condition, religion, belief, conscience, political opinion, culture, language, birth, military or veteran status, or any other characteristic protected by applicable law.

Discrimination may be direct or indirect and may arise through decisions, conduct, policies, practices, requirements or workplace behaviour.

5 HARASSMENT AND BULLYING

Harassment means unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive work environment.

Discriminatory harassment means harassment connected to a protected characteristic or other ground protected by applicable law.



Bullying means repeated or serious inappropriate conduct that undermines, intimidates, humiliates, degrades or harms another person in a work-related context. Bullying may occur even where it is not connected to a protected characteristic.

Examples of prohibited harassment or bullying may include:

- a) insults, slurs, offensive jokes or degrading comments;
- b) intimidation, threats, humiliation or hostile behavior;
- c) excluding, isolating or undermining a person in an inappropriate or abusive manner;
- d) spreading malicious rumors or making personal attacks;
- e) displaying, sending, posting or storing offensive written, graphic, audio or video material;
- f) repeated unreasonable criticism, shouting or aggressive behavior;
- g) misuse of authority or position to intimidate, pressure or disadvantage another person; and
- h) other conduct that creates or contributes to a hostile, degrading, humiliating or offensive work environment.

Reasonable performance management, feedback, supervision, business decisions or disciplinary action do not constitute harassment or bullying when carried out appropriately, professionally and in good faith.

6 SEXUAL HARASSMENT

Sexual harassment is a form of prohibited harassment and may also constitute unlawful discrimination.

Sexual harassment means unwanted conduct of a sexual nature, or other conduct based on sex, gender, sexual orientation, gender identity, gender expression or transgender status, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive work environment.

Sexual harassment may occur regardless of the sex, gender, sexual orientation, seniority or position of the individuals involved. A single serious incident may constitute sexual harassment.

Examples of sexual harassment may include:

- a) unwanted physical contact, including touching, hugging, kissing, pinching, patting or brushing against another person;
- b) sexual assault, attempted sexual assault or threats of sexual conduct;
- c) unwelcome sexual advances, propositions, flirtation or requests for sexual favors;
- d) comments about a person's body, appearance, sex life, sexual orientation, gender identity or gender expression;
- e) sexually explicit or offensive jokes, remarks, innuendo, gestures, messages, images or videos;
- f) displaying or sharing sexually suggestive or explicit material;
- g) repeated unwanted attention after a person has indicated that the conduct is unwelcome;
- h) making employment, promotion, training, compensation, work assignments or other benefits conditional on sexual conduct; and
- i) favoring, rewarding or disadvantaging individuals based on acceptance or rejection of sexual advances.

Personnel should be aware that sexual harassment may also violate applicable law and, in serious cases, may result in personal civil or criminal liability.

7 WORKPLACE RELATIONSHIPS AND CONFLICTS OF INTEREST

Octave recognises that personal or romantic relationships may arise in the workplace.

Personnel involved in a workplace relationship are expected to ensure that the relationship does not create a conflict of interest, misuse of authority, favouritism, perceived favouritism, retaliation, disruption to the workplace or adverse impact on professional judgment.

Personnel should disclose a workplace relationship where it creates an actual or potential conflict of interest, power imbalance, direct or indirect reporting relationship, influence over employment decisions, or other work-related risk.

Octave may take appropriate steps to manage actual or potential conflicts arising from workplace relationships, subject to applicable law. Such steps may include changes to reporting lines, work assignments, decision-making responsibilities or other appropriate measures.

Conduct connected to a workplace relationship may breach this Policy where it involves harassment, sexual harassment, retaliation, coercion, abuse of authority, favouritism or other inappropriate conduct.

8 BREACHES OF THIS POLICY

A breach of this Policy may result in appropriate corrective or disciplinary action, subject to applicable law.



Corrective or disciplinary action may include training, coaching, counselling, warnings, changes to duties or reporting lines, suspension, termination of employment or engagement, or reduction or termination of business with a supplier, vendor, contractor or other third party.

Octave may also take appropriate action where a manager or supervisor knew, or reasonably should have known, of conduct that may breach this Policy and failed to escalate it appropriately.

9 RAISING CONCERNS

Personnel are expected to promptly report any actual or suspected violations of this Policy or applicable laws. Reports may be made through Octave's established reporting channels. Information on available reporting channels, confidentiality protections, and non-retaliation safeguards is available on Octave's [website](#). Reports are reviewed and investigated in accordance with the Octave's Speak Up Policy and related procedures.