AS METAL COM is committed to providing a safe environment for all its employees, free from discrimination on any grounds and from harassment in the workplace, including sexual harassment**.**

AS METAL COM will apply a zero tolerance policy for any form of harassment in the workplace, will treat all incidents seriously and promptly and will investigate all allegations of harassment. Any person found to have harassed another person will be subject to disciplinary action, up to and including dismissal from employment.

All complaints of harassment will be taken seriously and will be treated confidentially.

People who file sexual harassment complaints will not be victimized as a result of filing a complaint.

DEFINITION OF HARASSMENT

Harassment is unwanted behavior, **including of a sexual nature**, that makes a person feel offended, humiliated or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations that create a hostile, intimidating or humiliating environment. Harassment may involve one or more incidents and actions that constitute physical, verbal and non-verbal harassment. Examples of conduct or behaviors that constitute workplace harassment include, but are not limited to:

-PHYSICAL CONDUCT

- Unwanted physical contact, including grabbing, rubbing, kissing, hugging, hugging, caressing, inappropriate touching, on the head or body;
- physical violence, including sexual assault;
- use of job-related threats or rewards to solicit sexual favors;

-VERBAL BEHAVIOR

- comments on an employee's appearance, age, private life, etc;
- sexual comments, stories and jokes of a sexual nature;
- sexual advances;
- repeated and unwanted social invitations for dating or physical intimacy;
- sending sexually explicit messages (by phone, e-mail or any other means of communication).

-NON-VERBAL BEHAVIOR

- displaying sexually explicit or suggestive material;
- sexually suggestive gestures;
- whistles;
- insistent looks.

RESPONSIBILITY AND GOVERNANCE

The General Manager and the Human Resources Department are responsible for the implementation, application and monitoring of this Anti-harassment Policy.
Managers at all levels are responsible for promoting a respectful working environment and for ensuring that any concerns related to harassment are addressed in accordance with this policy.

DEFINING THE CONCEPT OF HARASSMENT

Moral harassment in the workplace is any behavior which, by its systematic nature, may harm the dignity, physical or mental integrity of an employee or group of employees, endangering their work or degrading the working climate. Stress and physical exhaustion are covered by workplace bullying. This behavior can manifest itself in any of the following forms:

- hostile or unwanted conduct;

- verbal comments;

- actions or gestures.

Sometimes also called **psychological harassment or bullying**, bullying can take many forms, depending on the behavioral abuses committed. These include:

- intimidation by language or gestures, threats of any kind;
- creating pressure and tension through excessive supervision;
- differential treatment in relation to other employees;
- discrediting the employee's professional skills;
- spreading false information about an individual's professional and personal life;
- isolating the individual from their colleagues - either physically or by assigning tasks so that they do not have to interact with other team members;
- repeatedly ignoring the individual, despite their attempts to communicate;
- refusing to give the employee tasks, so that he/she is demotivated and possibly prompted to look for a new job;
- burdening the employee with too many tasks, leading to burnout.

A specific form of **bullying is called mobbing** (from the English word "mob", meaning "mob") and is abuse by not one, but several individuals.

SUBJECT OF HARASSMENT

Anyone can be a victim of harassment, regardless of the gender of the recipient and the gender of the harasser.

Harassment can occur both between people of different sexes and between people of the same sex.

Harassment is a manifestation of power relations and often occurs in unequal relationships in the workplace, for example between manager or supervisor and employee.

Harassment of any kind is prohibited, both inside and outside **the AS METAL COM** premises, including at social events, business trips, training sessions or company-sponsored conferences.

PREVENTION AND AWARENESS

AS METAL COM provides information and awareness activities aimed at preventing harassment and discrimination in the workplace.

Employees are informed about acceptable workplace behavior, their rights and obligations under this policy, including through onboarding processes and internal communication.

COMPLAINTS PROCEDURE

Any person who feels harassed at work can complain to the direct superior or, if the person who is harassed is the direct superior, to the human resources department or to a person in the company's senior management.

The person receiving any such sexual harassment complaint must:

- record it immediately, including dates, times and facts of the incident(s);
- clarify the victim's views on the desired outcome;
- ensure that the victim understands the company's procedures for resolving the complaint;
- to present and choose with the victim one of the next steps of action:
    - Informal or formal complaint, with the understanding that the choice of informal resolution does not preclude the possibility that the victim may also want a formal resolution if the harassment continues;
- keep a confidential record of all discussions;
- to respect the victim's choice;
- ensure that the victim knows that he/she can file the complaint outside the company, with the competent authorities.

The person who initially received the complaint will forward the complete situation to the company's senior management for the purpose of initiating a formal investigation. The Human Resources Department will initiate the setting up of a disciplinary investigation committee, in accordance with the company's Internal Rules.

The person conducting the investigation must:

- to interview the victim and the alleged stalker separately;
- interview other relevant third parties separately;
- to decide whether or not the harassment incident occurred;
- prepare a report detailing the investigations, findings and any recommendations;
- if harassment has occurred, decide what is the appropriate solution for the victim, in consultation with the victim (considering apology, change of working arrangements, a promotion if the victim has been demoted as a result of the harassment, training for the harasser, disciplinary sanctions, suspension, dismissal);
- follow up on post-decitial events to ensure that recommendations are implemented, that harassment has stopped and that the victim is satisfied with the outcome
- If unable to determine that harassment has occurred, the counselor may make recommendations to ensure that productivity and work activity are not affected;

- keep a record of all actions taken; ensure the confidentiality of all records relating to the complaint case.

MONITORING AND RESULTS

AS METAL COM monitors the application of this Anti-harassment Policy through internal reporting mechanisms, management oversight and Human Resources processes.

During the period 2023–2025, no confirmed cases of harassment or discrimination were identified, or where concerns were raised, they were addressed in accordance with internal procedures.

GENERAL MANAGER,
Constantin APOSTOL