



ALTYOR

**Policy**

**政策**

Anti-harassment

反骚扰

This leaflet is dedicated to the definition of the different types of harassment (moral and sexual) and (re)actions.

### 1. MORAL HARASSMENT

It includes repeated **malicious behaviour**: derogatory remarks, intimidation, insults, etc. **It leads to a deterioration in working conditions**: infringement of rights and dignity, impairment of physical or mental health, questioning of professional future. **As a reminder, moral harassment is an offence.**

### 2. SEXUAL HARASSMENT

It includes repeated **comments or behaviour with a sexual or sexist connotation**: derogatory remarks, sexist jokes, inappropriate gestures, etc. **Any form of serious pressure (even if not repeated) with the aim of obtaining a sexual act is considered sexual harassment.**

**As a reminder, sexual harassment is an offence.** Sexual harassment is an attack on dignity (degrading or humiliating) and creates an intimidating, hostile or offensive situation.

### 3. HOW TO ACT AGAINST IT?

#### ☑ Prevention

- **Identify/report** unusual and/or inappropriate behaviour or words
- **Warn** in case of urgent situations (for oneself or others)
- **Encourage** dialogue (listening, discussion)
- **Analyse** situations, **find** solutions
- **Refer to / seek** external help

#### ☑ Appeal

- **Internal alert**: via a manager, the HR department or anonymously via:

<https://altyor.com/csr-commitments/>

Your alert will be processed as soon as possible.

- **External alert**: labour inspectorate, emergency number in France 17 or in China : 110)
- **Mediation procedure**: conciliation / agreement to find solutions
- **Referral to the courts**: industrial tribunal, criminal court, rights defender

#### ☑ Sanction

- **Employer** : layoff, dismissal ...
- **Justice** :
  - ☑ In France, this offense is punishable by from 1 year in prison and a €15,000 fine (moral or sexual harassment)\*
  - ☑ In China, this offence is punishable by up to 5 years in prison (moral or sexual harassment)\*\*

### 4. REPORTING

Altyor is committed to monitoring its performance on harassment and, to this end, tracks the following indicators:

- Number of breaches of the code of ethics and CSR policies
- Number of incidents reported through the whistleblowing procedure

\* <https://www.service-public.fr/particuliers/vosdroits/F32247#--text=Une%20C3%A9quipe%20de%20policiers%20ou%20de%20l'Union%20europ%C3%A9enne>  
\*\* <https://www.chinajusticeobserver.com/a/is-sexual-harassment-a-crime-in-china>

- Percentage of employees from minority groups and/or vulnerable workers employed in relation to the organisation as a whole.
- Percentage of employees from minority groups and/or vulnerable workers in management positions (excluding boards of directors).
- Percentage of female employees in relation to the organisation as a whole
- Percentage of women in management positions (excluding boards)
- Percentage of women on the organisation's board of directors
- Average unadjusted gender pay gap
- Percentage of women (gender balance)
- Average length of service

## 5. SCOPE

This policy applies to all Altyor Group entities and all external stakeholders of the Group.

## 6. RESPONSIBILITY

The CSR Committee is responsible for defining the anti-harassment policy. The human resources department is responsible for ensuring that the policy is properly implemented.

## 7. COMMUNICATION

This policy is communicated annually to all employees through the company's usual channels, including the company's internal rules and intranet, and is presented to all new staff at induction. This policy is also distributed to external stakeholders and is available on the Altyor website.

## 8. CONTACT

For more information, please contact Karen Murciano kmurciano@altyor.com or send an email to contact@altyor.com.

## 9. REVIEW HISTORY TABLE

This policy is reviewed annually or in the event of a change in related government policy or significant changes in the company's operations.

This policy was last approved on 3 July 2023 by Yanis Cottard, President of the Altyor Group.

Policy Version	Description of Change	Date of Change
A	N/A	January 2023
B	Adding KPIs to the policy	July 2023

这本小册子专门对不同类型的骚扰（道德和性骚扰）和（再）行动进行定义。

## 1. 道德骚扰

它包括反复的恶意行为：贬低言论、恐吓、侮辱等。它导致了工作条件的恶化：侵犯权利和尊严，损害身体或精神健康，质疑职业前途。需要提醒的是，精神骚扰是一种犯罪。

## 2. 性骚扰

它包括具有性或性别歧视内涵的反复评论或行为：贬低性言论、性别歧视笑话、不恰当的手势等。任何形式的以获得性行为为目的的严重压力（即使没有重复）都被视为性骚扰。

需要提醒的是，性骚扰是一种犯罪。性骚扰是对尊严的攻击（有辱人格或侮辱性），并造成恐吓、敌意或攻击性的情况。

## 3. 如何对其采取行动？

### 预防

- 识别/报告不正常和/或不适当的行为或言语
- 在紧急情况下发出警告（为自己或他人）。
- 鼓励对话（倾听、讨论）
- 分析情况，寻找解决方案
- 转介/寻求外部帮助

### 上诉

- 内部警报：通过经理、人力资源部门或以匿名方式通过：

<https://altyor.com/csr-commitments/>

您的警报将被尽快处理。

- 外部警报：劳动监察部门，法国的紧急电话 17，中国的紧急电话：110
- 调解程序：调解/协议寻找解决方案
- 提交给法院：工业法庭、刑事法庭、权利维护者

### 制裁

- 雇主：裁员、解雇...
- 司法：
  - 在法国，这种违法行为可处以 1 年监禁和 15 000 欧元罚款（精神骚扰或性骚扰）\*。
  - 在中国，这种罪行可被判处最高 5 年的监禁（精神或性骚扰）\*\*。

\* <https://www.service-public.fr/particuliers/vosdroits/F32247#--text=Une%20%C3%A9quipe%20de%20policiers%20ou%20de%20l'Union%20europ%C3%A9enne>  
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#### 4. 报告

阿尔泰尔致力于监测其在骚扰方面的表现，并为此跟踪以下指标

- 来自少数群体的员工和/或弱势工人在整个组织中的雇佣比例。
- 来自少数群体和/或弱势工人的员工在管理职位（不包括董事会）的百分比。
- 女性员工占整个组织的百分比
- 担任管理职位（不包括董事会）的女性百分比
- 女性在组织的董事会中的百分比
- 平均未经调整的性别薪酬差距
- 女性的百分比（性别平衡）
- 平均服务年限
- 违反道德准则的事件数量
- 通过举报程序举报的事件数量。

#### 5. 范围

本政策适用于阿尔泰尔集团的所有实体和集团的所有外部利益相关者。

#### 6. 责任

企业社会责任委员会负责确定反骚扰政策。人力资源部门负责确保该政策得到正确执行。

#### 7. 沟通

本政策每年通过公司的常规渠道向所有员工传达，包括公司的内部规则和内部网，并在所有新员工入职时向他们介绍。本政策也分发给外部利益相关者，并可在 Altyor 网站上查阅。

#### 8. 联系方式

欲了解更多信息，请联系 Karen Murciano kmurciano@altyor.com 或发送电子邮件至 contact@altyor.com。

#### 9. 审查历史表

本政策每年或在相关政府政策发生变化或公司业务发生重大变化时进行审查。

本政策最后由阿尔泰尔集团总裁 Yanis Cottard 于 2023 年 7 月 3 日批准。

政策版本	变更说明	修改日期
A	N/A	2023 年 1 月
B	在政策中添加关键绩效指标	2023 年 7 月



\* <https://www.service-public.fr/particuliers/vosdroits/F32247#-text=Une%20C3%A9quipe%20de%20policiers%20ou%20de%20l'Union%20europ%C3%A9enne>  
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