



ANTI-HARASSMENT POLICY

STATEMENT

SNF is committed to maintaining a safe, respectful, and inclusive environment for all employees, visitors, and contractors. Harassment in any form is strictly prohibited and will not be tolerated. This policy outlines our commitment to preventing harassment, the procedures for reporting incidents, and the actions that will be taken to address complaints.

SCOPE

This policy applies to all employees, visitors, contractors, and anyone associated with SNF. It covers all forms of harassment, including but not limited to sexual, verbal, physical, or psychological harassment. The anti-harassment policies may vary from one jurisdiction to another depending on the applicable rules. Any person concerned is encouraged to refer to the anti-harassment policy of the relevant jurisdiction for further details.

DEFINITION OF HARASSMENT

Harassment refers to any unwelcome conduct, verbal or physical, based on protected characteristics such as gender, sensitive medical conditions, trade union membership or activities, discrimination in employment decisions (hiring/promoting /redundancies), discrimination in working conditions (working hours/training/remuneration/social security), race, ethnicity, nationality, social background, religion, sexual orientation, family responsibilities (including pregnancy), disabilities, political opinion, and age or any other characteristic protected by law. Harassment becomes unlawful when it creates a hostile or intimidating work or living environment or results in adverse employment.

RESPONSIBILITIES

Management: The management team is responsible for setting the tone and promoting a harassment-free environment. They should lead by example and take appropriate actions to prevent and address harassment promptly and effectively.

Employees: All employees are responsible for treating others with respect



and reporting any incidents of harassment promptly. They should cooperate with any investigations and refrain from engaging in retaliatory actions.

PROCEDURES FOR REPORTING HARASSMENT

Reporting Process: Any individual who believes they have been harassed or witnessed harassment should report the incident immediately. Reports should be made to the SNF Chief Compliance Officer (e-mail address: ethics@snf.com) or the designated Human Resources representative.

Confidentiality: All reports of harassment will be treated with the utmost confidentiality to the extent permitted by law. Only individuals involved in the investigation and resolution process can access the information.

Investigation: Once a report is received, SNF will initiate a prompt and thorough investigation. The investigation will be conducted impartially and involve interviewing relevant parties and gathering any necessary evidence.

Disciplinary Action: If an investigation determines that harassment has occurred, appropriate disciplinary action will be taken, including counseling, warnings, suspension, termination of employment, or legal actions, as deemed necessary.

RETALIATION

Retaliation against any individual who reports harassment, participates in an investigation, or provides information related to a harassment complaint is strictly prohibited. Any incidents of retaliation should be reported immediately, and appropriate actions will be taken to address them.

EDUCATION AND TRAINING

SNF is committed to providing regular education and training programs to employees to raise awareness about harassment, its impacts, and the importance of maintaining a harassment-free environment.

REVIEW AND AMENDMENT

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws. Any necessary amendments will be made in consultation with legal counsel and communicated to all employees.

CONCLUSION

SNF is dedicated to fostering a safe and respectful environment free from harassment. This policy provides guidelines for prevention, reporting, and addressing harassment incidents promptly and effectively. By adhering to this policy, we can work together to create a workplace that upholds our values of dignity, respect, and equality for all.