



# Anti-discrimination policy

## Policy brief & purpose

Our anti-discrimination policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe and happy workplace for everyone.

Our company complies with all anti-discrimination laws and EU regulations.

## Scope

This policy applies to all employees, contractors, visitors, customers and stakeholders.

## Policy elements

Discrimination is any negative action or attitude directed toward someone because of protected characteristics, like race and gender. Other protected characteristics are:

- Age
- Religion
- Ethnicity/ nationality
- Disability/ medical history
- Marriage / civil partnership
- Pregnancy / maternity/ paternity
- Gender identity/ sexual orientation



Orada Adriatic d.o.o. za ulov, uzgoj, preradu i trgovinu ribom | **sjedište:** Turion 22, HR-51557 Cres | **uprava:** Kukuljanovo 341, HR-51227 Kukuljanovo | **t:** +385 (0) 51 565 200 | **f:** +385 (0) 51 565 212 | **e:** orada@orada-adriatic.hr | **www.royal-adriatic.hr**

**MB:** 0946354 | **OIB:** 86840413543 | **IBAN:** HR63 2484008 11068 14805 | Trgovački sud u Rijeci MBS 040040829 | Temeljni kapital 42.956.800,00 uplaćen u cijelosti | Predsjednik uprave: mr.sc. Marko Miculinić, dipl.oec | Član uprave: Vedran Rubeša, dipl.oec



## Discrimination and harassment

Our anti-discrimination and anti-harassment policies go hand-in-hand. We will not tolerate any kind of discrimination that creates a hostile and unpleasant environment for employees, interns or volunteers.

This is not an exhaustive list, but here are some instances that we consider discrimination:

- *[Hiring managers disproportionately disqualifying male or female job candidates on purpose.]*
- *[Managers bypassing team members with specific protected characteristics (e.g. race) for promotion without being able to formally prove (e.g. with documentation) the reasons other employees were selected instead.]*
- *[Employees making sexist comments.]*
- *[Employees sending emails disparaging someone's ethnic origin.]*
- [Termination or retirement based on race, caste, national origin religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination.]

Employees who harass their colleagues will go through our disciplinary process and we may reprimand, demote or terminate them depending on the severity of their offence.

We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. In case we conclude that an employee unconsciously discriminates, we will support them through training and counseling and implement processes that mitigate biases as we indicate in the next section. But, if this person shows unwillingness to change their behavior, we may demote or terminate them.

We will not be lenient in cases of assault, sexual harassment or workplace violence, whether physical or psychological. We will terminate employees who behave like this immediately.



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## Actions to prevent discrimination

To ensure that our conduct and processes are fair and lawful, we:

- *[Use inclusive language in job ads]*
- *[Set formal job-related criteria to hire, promote and reward team members.]*
- *[Offer compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics.]*
- *[Accommodate people with disabilities.]*
- *[Require managers to keep detailed records of their decisions concerning their team members and job candidates.]*

We will also consider additional measures to prevent discrimination, like:

- *[Using hiring processes that reduce bias like structured interviews]*
- *[Organizing trainings on diversity, communication and conflict management to improve collaboration among employees of different backgrounds.]*

## What to do in cases of discrimination

If you are the victim of discriminatory behavior (or if you suspect that others are being discriminated against,) please talk to HR (or your manager) as soon as possible. HR is responsible for hearing your claim, investigating the issue and determining punishment.

Punishment for discriminatory behavior depends on the severity of the offence. For example, inadvertently offending someone might warrant a reprimand. Conversely, willfully bypassing employees for promotion because of a protected characteristic will result in termination.

If you decide to make a claim to a regulatory body we are committed and bound by law not to retaliate against you.



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## How we address discrimination complaints

HR is proactive and responsive about determining whether discrimination occurs. For example, we:

- *[Look into similar claims about the same person or process to determine if discrimination is systemic.]*
- *[Track metrics and look into data that give us some insight on people's behaviors (e.g. percentage of job applicants of a certain race a hiring manager disqualifies.)]*
- *[Evaluate testimonies on social media that visitors, job candidates or former employees have made.]*
- *[Conduct discreet interviews and gather information.]*

We will investigate all claims discreetly. We will never disclose who made a complaint to anyone or give out information that may help others identify that person (e.g. which department or role they work in.)

We should all strive to prevent and address discrimination. Be aware of your implicit biases and speak up whenever you or your colleagues are discriminated against. If you have any ideas on how we can ensure fairness and equality in our workplace, we are happy to hear them.

In Kukuljanovo,  
01.05.2020.  
Željka Miculinić



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