

Section: Safety and Environmental Protection Policy**Topic: Harassment & Bullying****Page:****1 / 3****Doc#:****2.4.2**

Objective

To ensure that no DFDS staff/crew is subject to any harassment & bullying during their work in DFDS.

Background Information

MLC Convention B4.3.1 & B4.3.6

Responsibility

Captain, Department heads, Crewing & Designated Person

Procedures

Scope

This policy applies to all seafarers employed by DFDS and contractors (including agency employees) engaged on vessels operated, owned or managed by DFDS

Policy Statement

The Company undertakes to properly protect all Employees from harassment and bullying, whether sexually, racially or otherwise motivated. We strive to maintain a working environment based on dignity and mutual respect and are opposed to any discrimination based on age, colour, disability, marital status, nationality, gender, sexual orientation, religion, race.

We do not condone or tolerate behaviour that undermines the dignity or self-esteem of any individual or creates an intimidating, hostile, abusive or offensive environment.

The workplace shall be free from the risk of harassment or bullying and we shall ensure confidentiality and speed in correcting such acts if they occur. It shall also guarantee protection against any complaint submitted within the company or in legal proceedings brought as a defence against the risk of harassment or bullying.

Harassment and Bullying

Harassment and bullying need not be racially or sexually motivated. It can be suffered by anyone;

Harassment is behaviour which is persistent, offensive, abusive, intimidating or humiliating and may affect an Employee's work performance, health or employment;

When behaviour includes abuse of power or unfair penal sanctions which make recipients feel upset, threatened, humiliated or vulnerable, or if it is intended to undermine their self-confidence, then it is usually called bullying;

The following are examples of harassment and/or bullying:

- The abuse of power to control, influence or affect the job of an Employee;
- Behaviour that may publicly humiliate an Employee in front of others;
- Threats concerning an Employee's employment;
- Non-verbal harassment such as the display of offensive publications, posters or literature;

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- Cyber bullying, definition being the verbal bullying of someone (such as a colleague) through the use of often anonymous electronic communication (as online posts or text messages)

Properly discharged supervisory responsibilities, including delegation of work assignments, discipline or any conduct that does not undermine the dignity of the individual, are not harassment.

Sexual Harassment

Sexual harassment can be suffered by all genders. It is unwelcome or uninvited behaviour of a sexual nature which is offensive, embarrassing, intimidating or humiliating and may affect an employee's work performance, health, well-being safety or employment.

The following are examples of sexual harassment:

- the use of implicit or explicit coercive sexual behaviour to control influence or affect the job or an employee.
- Offensive behaviour that may humiliate an employee or a group of Employees because of their sex.
- Requests or demands of a sexual nature accompanied by implied or overt promises, preferential treatment or threats concerning an employee's employment.
- Non-verbal harassment such as the display of offensive publications, posters or literature.
- Harassment resulting in sexual assault or rape is criminal assault and will be dealt with accordingly.

Properly discharged supervisory responsibilities, including the delegation of work assignments, assessments, discipline or any conduct that does not undermine the dignity of the individual, are not sexual harassment. Sexual harassment is not consensual sexual behaviour between two people.

Racial Harassment

Racial harassment is offensive, embarrassing, intimidating or humiliating behaviour directed at an Employee because of that person race.

The following are examples of racial harassment:

- Verbal comments, jokes and innuendo that are perceived to be offensive.
- Rude or offensive gestures, interrogation or teasing someone about their race or customs.
- The display of racially abusive slogans, pictures, objects or publications is also harassment.

Properly discharged supervisory responsibilities include the delegation of work assignments, assessment, discipline or any conduct that does not undermine the dignity of the individual, are not harassment.

All employees should respect and act in accordance with the company procedures and the DFDS Code of Conduct which can be found on the Bridge. (See link at the bottom of this procedure) Any failure to do so will be considered a disciplinary matter.

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Any employee who feels they have been subjected to sexual or racial harassment or bullying of any description, or feels that mutual respect or dignity has been breached, should do as follows:

Reporting

Passenger Vessels: Report the matter to the General Officer Manager who as the independent representative of the Marine HR Department will handle all cases or complaints raised in conjunction with the Master and the shore based Marine HR Team.

Freight Vessels: Report the matter to the captain who will handle all cases or complaints raised in conjunction with the shore based Marine HR Team.

You will not be penalized by the company for making a complaint, provided it is not vexatious or made maliciously.

Contact information (For DK flagged vessels)

Crewing department:

crew@dfds.com

Designated Person

marine@dfds.com

Contact information (For TR flagged vessels)

Crewing department:

crewing.med@dfds.com

Designated Person

marinestandards.tr@dfds.com

or the personal emails/phone numbers for the DP/DP substitutes. This is normally displayed on the notice board or you can find it the SMS manual document 8.2.2.

Documentation and Records

For more information then the publication "GUIDANCE ON ELIMINATING SHIPBOARD HARASSMENT AND BULLYING" may be useful.

The publication can be found online here:

<https://www.itfglobal.org/en/reports-publications/ics-itf-guidance-eliminating-shipboard-harassment-and-bullying>

DFDS Code of Conduct can be found on the Bridge, under "DFDS Code of Conduct":

<https://dfds.sharepoint.com/sites/EmployeePortal/>