



The Olive Masters.



REGULATION
FOR THE PREVENTION OF HARASSMENT,
DISCRIMINATION AND AGGRESSION IN THE WORKPLACE

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1. Purpose and recipients

1.1. Purpose

The goal of the Regulation is to raise awareness among all Madama Oliva staff about harassment, discrimination and aggression/violence in the workplace.

In accordance with the Gender Equality Policy, the company seeks to uphold a working environment that guarantees equal opportunities, respect and safety for all employees, regardless of their gender, sexual orientation, religious views, nationality or any other personal trait.

The company does not tolerate any form of harassment, aggression, violence and any other inappropriate behaviour.

This document is intended to provide a framework of the principles, behaviour and concrete actions implemented by Madama Oliva to prevent or manage any form of harassment or aggression in the workplace.

1.2. Recipients

This policy applies to all the company's staff when carrying out their duties inside and outside the workplaces.

The regulation is intended for all employees and collaborators, regardless of their gender, role, level and contract type.

2. Principles

A summary is given below of the most important reference principles that guide Madama Oliva in carrying out its activities, to ensure equal opportunities and inclusion for all workers:

- **Zero tolerance:** the company rejects any behaviour that constitutes or may be seen to constitute physical or psychological violence or harassment, including sexual harassment, or any other behaviour that may constitute mobbing or harassment;
- **For Madama Oliva, the most important resource is the people** who work and contribute towards achieving the company's goals. Hence the company is committed to creating the best possible conditions in the workplace, supporting its staff throughout their working life within the organisation;
- Madama Oliva's culture is **based on respect, professionalism, non-discrimination and equal opportunities;**
- Madama Oliva also **explicitly prohibits any behaviour that conditions employment, remuneration or career opportunities based on any form of sexual activity or activity of a sentimental nature.**

3. Definition of harassment, violence (aggression) and discrimination in the workplace

A definition of what is meant by aggression (violence) and harassment is set out below to enable all recipients of these regulations to recognise this behaviour.

3.1. Violence and harassment

The expression '**violence and harassment**' in the workplace means a set of unacceptable practices and behaviour, or the threat to engage in them, whether once or repeatedly, that intend, cause or are likely to result in physical, psychological, sexual or economic harm, including gender-based violence and harassment.

3.2. Gender harassment

Gender harassment is unwanted behaviour, carried out for reasons related to the sex of a person, with the purpose or effect of violating the dignity of a female or male worker and of creating an intimidating, hostile, degrading, humiliating or offensive climate.

Gender harassment is unwanted gender-related behaviour, manifested in a physical, verbal or non-verbal form, with the purpose or effect of violating the dignity of a female or male worker and of creating an intimidating, hostile, degrading, humiliating or offensive climate. (Directive EU 73/2002)

Examples of harassment are:

- Verbal expressions that are offensive or otherwise imply unwelcome confidentiality;
- Sexual innuendos, unwelcome comments or jokes;
- Touching, pinching, caressing, kissing, hugging, grabbing, brushing against another person's body;
- Offensive or sexually explicit messages, emails, text messages, inappropriate advances;
- Gestures, sexual jokes, provocations, vulgar or improper flirtation;
- Explicit demands for sexual favours;
- Use of anecdotes, jokes or stories of a sexual nature that may make the other party uncomfortable.

3.3. Violence in the workplace

Workplace violence refers to incidents in which staff are **abused, threatened or assaulted in work-related circumstances**, including commuting to and from work, with explicit or implicit consequences for health, safety and welfare (WHO World Health Organisation).

Examples of workplace violence are:

- Touching, pinching, kissing, hugging, grabbing, brushing against another person's body;
- Acts of mobbing or behaviour affecting the right to health or any other form of psychological manipulation or abuse;
- Physical violence, specifically **aggression**;
- Verbal and psychological violence;
- Acts of bullying, shouting and insults;
- Threats of retaliation or negative consequences of any kind.

3.4. Discrimination

Discrimination in the workplace refers to measures or behaviour that specifically prevent access to employment or participation in employment for one or more groups of 'disadvantaged' persons.

Discrimination is also related to psychosocial risks and has a negative impact on violence and harassment at work.

More specifically, discrimination may be based on certain real or perceived differences, such as race, skin colour, sex and gender, religion, political opinions, national extraction or social origin, pregnancy or family responsibilities, age, disability, etc.

Articles 25 and 26 of Italian Leg. Decree 198/2006 define the forms of direct and indirect discrimination.

Forms of direct discrimination

Direct discrimination is any provision, criterion, practice, act, stipulation or conduct, as well as an order to carry out an act or conduct, which produces a prejudicial effect by discriminating against workers on grounds of their gender and, in any event, treatment less favourable than that of another worker in a similar situation.

Forms of indirect discrimination:

Any provision, criterion, practice, act, stipulation or conduct, that is apparently neutral but has the potential to place workers of one sex at a particular disadvantage compared with workers of the other sex, unless it relates to a requirement essential to the performance of the employment activity, constitutes a form of indirect discrimination.

Discrimination as a reaction

Unfavourable treatment by an employer, that is a reaction to a complaint or action aimed at obtaining compliance with the principle of equal treatment between men and women, is considered discrimination.

Less favourable treatment incurred by a worker for opposing discriminatory behaviour in the form of harassment, including sexual harassment (or vice versa, for submitting to it), is also considered discrimination.

Collective discrimination

Collective discrimination means all direct and indirect discriminatory behaviour that affects multiple individuals, even when such individuals are not immediately and directly identifiable.

According to Article 25, paragraph 2-bis of Italian Leg. Decree 198/2006, any less favourable treatment on the grounds of pregnancy, maternity or paternity, including adoption, or on the grounds of entitlement to and exercise of the rights relating to the above, constitutes discrimination.

3.5. Places where harassment and violence occur or may occur

Violence and harassment in the workplace are considered such if they occur:

- In public, private, office, or work-related spaces;
- Areas used for breaks;
- Restrooms;
- During work-related travel or trips;
- Training sites;
- Social events.

4. Prevention

4.1. Prevention programme adopted by the company

In order to prevent incidents of harassment, violence or discrimination, Madama Oliva has set up a prevention programme that includes the following actions:

- **Education and information**

All personnel are required to make an explicit commitment to act within the scope of their professional activity in compliance with these regulations and the principles referred to in the gender equality policy, which is why the company constantly promotes specific training at all levels.

- **Risk assessment of violence and harassment**

In order to mitigate the risk, Madama Oliva, with the support of its Steering Committee and the OHSO, has carried out a risk assessment of all forms of physical, verbal and digital violence in the workplace in order to include this risk in the company's Risk Assessment Document (DVR).

- **Annual survey**

The Steering Committee sends out an annual survey to all staff to analyse working conditions and the workplace, but above all to check the occurrence of incidents or events of harassment, discomfort, internal or external disruption during the course of their work.

The survey is anonymous and aims to identify any signs of harassment or discomfort and will be one of the elements used to reassess the specific risk and the definition of the harassment prevention and management plan.

Consequently, Madama Oliva requests that it be filled out carefully and correctly by all those concerned, indicating any useful information to improve the safety of workers.

- **Language**

Madama Oliva undertakes to maintain equal spoken and written language in accordance with the principles followed by the organisation. The company also requires a linguistic commitment from its staff in order not to hurt anyone's feelings and thus to maintain an inclusive and non-judgemental working environment.

- **Head of gender equality management system and entire steering committee**

The company's employees and collaborators may request an individual interview with the members of Madama Oliva's Steering Committee at any time.

The members of the Steering Committee are listed below:

- Serena Di Francesco - s.difrancesco@madamaoliva.it
- Antonio Giovanni Liconti – a.liconti@madamaoliva.it

4.2. General rules of conduct to prevent harassment and abuse

The following rules of conduct are applied in order to avoid the creation of conditions in the workplace, which may favour harassment or violence:

- All workers are forbidden to use language that is not respectful of others;
- Keeping doors open in offices and workplaces where there is no need for confidentiality;
- Ensuring lighting, access and adequate separation in the restroom facilities;
- Participating with focus and commitment in training events on the Code of Ethics and the prevention of harassment and abuse.

Violation of these rules of conduct may be sanctioned as laid down in the disciplinary code of Madama Oliva.

5. Reporting and management

5.1. Who to contact in case of violence or harassment

It is essential for the protection of all persons that they report any acts of harassment, violence or discrimination or any other behaviour, including inappropriate sexual behaviour.

Madama Oliva, therefore, stresses the importance of reporting such behaviour and supporting whistleblowers and victims from any retaliation.

In the event of an act of harassment, violence, discrimination or any other inappropriate behaviour, the person concerned may report it, without prejudicing the option of appealing directly to the competent authorities:

- To the company, directly to the members of the Steering Committee at the following addresses:
 - Serena Di Francesco - s.difrancesco@madamaoliva.it
 - Antonio Giovanni Liconti - a.liconti@madamaoliva.it
- Through the channels set up for the whistleblowing procedure at the following link:
 - <https://whistleblowing.madamaoliva.it/welcome>

For the subject matter of the report submitted through the whistleblowing channel and the way it is handled, please refer to the whistleblowing regulation adopted by the company and available on its website. **In the event of a non-anonymous report, the confidentiality and protection of the whistleblower is guaranteed, as expressly provided for in the whistleblowing regulation. These protections are also extended to reports received through channels other than the whistleblowing channel.**

Specifically, the report may concern, by way of example, but not limited to, the following topics:

- physical or verbal abuse;
- digital abuse (online harassment, via emails, social media, etc.);
- mobbing;
- non-inclusion;

- discrimination of gender, race, sexual orientation, etc.;
- unequal pay;
- use of inappropriate language;
- behaviour contrary to the company's principles and policy.

Reports made through the whistleblowing channel on the company website will be handled in the first instance by the HR department, as well as a representative of a Committee member, identified as the recipient, who will communicate the relevant reports to all members of the Steering Committee.

If the person reported is the same person as the recipient, the report will be handled by the Committee member not involved in the report.

As a preliminary step, the HR Department, and possibly with the support of the entire Steering Committee, will carry out an assessment of the existence of the essential requirements of the report in order to assess its admissibility (preliminary investigation).

After determining that the report is admissible, the HR department, with the help of the entire Steering Committee, will carry out the appraisal (investigation) necessary to follow it up, including hearings and the acquisition of documents, while respecting the principles of impartiality and confidentiality.

Upon completion of the investigation and, in any case, within 3 months from the date of the acknowledgement of receipt (notification), the receiver undertakes to provide feedback to the whistleblower, unless the deadline is extended to 6 months if adequately motivated.

Non-anonymous reports sent directly to members of the Steering Committee will be handled directly by the Steering Committee, excluding members who may be involved or subject to the whistleblowing.

In the case of these reports, the Steering Committee will verify the truthfulness of the reported content, including through direct interviews with the person and/or colleagues aimed at identifying any discriminatory episodes.

Within thirty days of receiving the report, the Steering Committee will provide an initial reply to the whistleblower.

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We would also like to reiterate that all reports will be handled with the utmost confidentiality and that no form of retaliation or discrimination against the whistleblower will be tolerated or allowed. Action will, however, be taken in the event of false and deliberately slanderous or defamatory reports.

The company also requests that as many details as possible are provided when submitting a report. This information will enable the Steering Committee or the HR department to take the necessary steps to resolve the problem and identify the person responsible for the conduct.

The Steering Committee would also like to stress the importance of involving all personnel on these issues in order to be able to improve the system adopted by the company on a daily basis. Please note, therefore, that any suggestions or opinions about the issues of gender equality can also be sent to the Steering Committee by email, thus offering a significant contribution to the continuous improvement of the company on an annual basis.

5.2. No retaliation

Madama Oliva recognises that employees and collaborators may find it difficult to submit complaints of harassment. This regulation is, therefore, intended to encourage them to come forward with their concerns without fear of retaliation or any other negative action that would discourage a reasonable person from reporting perceived harassment or discrimination.

5. Contacts and clarifications

If you require any additional information or clarification regarding the contents of this document, please contact the members of the Steering Committee at the following email addresses:

- Serena Di Francesco - s.difrancesco@madamaoliva.it
- Antonio Giovanni Liconti - a.liconti@madamaoliva.it

6. References

7.1. Internal references

- Gender Equality Policy
- Whistleblowing regulation

7.2. External references

- ILO Convention No. 190 on the elimination of violence and harassment in the world of work;
- Italian Law No. 4 of 15 January 2021 ratifying and implementing ILO Convention No. 190 on the elimination of violence and harassment in the world of work;
- Italian Leg. Decree 196/2003 and Regulation EU 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data;
- Italian Leg. Decree 198/2006 Law on Equal Opportunities;
- Italian Leg. Decree 81/08 Consolidated Safety Act;
- Italian Leg. Decree 24/2023, Whistleblowing;
- Uni/ Pdr 125/2022.

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