

Anti-Harassment and Anti-Bullying Policy

December 17, 2021

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A message from our Executive Management Board

At SimCorp, we believe that a diverse, equitable, and inclusive workplace is beneficial for everyone: our employees, our management, our clients, our investors, and the societies we operate in. By creating workplaces where we embrace diversity as a strength, acknowledge the unique experiences and perspectives that everyone brings, and appreciate each other, we can continue to build an inclusive and equitable work environment for all.

We take active measures to create workplaces where all of our employees can thrive and reach their full potential, no matter who, where, or how they are. This means also having the courage to speak out, if and when necessary.

SimCorp respects the value, dignity, and human rights of every employee. We encourage everyone to bring their authentic selves to work, to be curious, and to act with mutual respect every day.

1. Introduction

We are committed to making SimCorp a truly diverse, equitable, and inclusive workplace. A workplace where all employees have equal access to opportunities, feel included, and are valued for the different perspectives and competencies they bring. We believe that SimCorp will be most successful when we are courageous, curious, capable, and collaborate to build a culture where everyone can thrive and be their true self - together.

We believe that everyone contributes to our organizational culture, and we undertake several initiatives to enable a collaborative and inclusive work environment. Simultaneously, we are committed to providing a workplace that is free from violence, bullying, and harassment. Simultaneously, we have a zero-tolerance policy for workplace violence, harassment, and bullying.

While the [Diversity, Equity, and Inclusion Policy](#) clearly outlines our ambitions to create positive work environments, the purpose of this Policy is to clearly:

- Define harassment and bullying
- Outline our position on harassment and bullying
- Acknowledge that everyone plays a role in creating a harassment-free and bully-free workplace
- Advise current and potential employees and/or customers on actions to take if they have experienced or witnessed harassment and/or bullying at SimCorp
- Protect our colleagues against inappropriate, uncomfortable, and/or unwanted actions which can create a threatening, non-inclusive, intimidating, or hostile work environment

2. Scope

Together with the Diversity, Equity, and Inclusion Policy and the [Guideline for Good Business Behavior](#), this Anti-Harassment and Anti-Bullying

Policy serve as the Code of Conduct and the guiding principles for our company culture. This Policy applies to all employees, including full and part time employees; all markets; and all functional units. The principles around harassment and bullying apply to all SimCorp employees, contractors, and suppliers.

Local considerations may apply, but the global policies must be observed.

This Policy is based on international standards, practices, and definitions of harassment and bullying from the International Labour Organisation (ILO) and the United Nations (UN). SimCorp is committed to ensuring that human rights are respected in our workplaces, and we have been a signatory of the United Nations (UN) Global Compact since 2019.

3. Key definitions: Workplace violence, harassment and bullying

According to the International Labour Organisation (ILO), workplace violence and harassment “refer to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.” SimCorp accepts and acknowledges this internationally recognized definition for the purpose of this Policy and any relevant initiatives.

Workplace violence, harassment, and bullying can take place during or after work hours. Incidents can occur on-site at a SimCorp office, offsite at an officially sponsored SimCorp event, during travel, or outside the office between two or more SimCorp employees in private situations. A single act or multiple, repeated incidents may be considered workplace harassment or bullying.

The person committing the harassment or bullying may be of the same or different gender, gender identity, racial, ethnic, cultural, sexual orientation,

generation, or other social identity as the receiver. The target of the incidents may be an individual or a group of employees.

Importantly, acts of harassment and bullying do not require physical presence, as they can occur in virtual spaces. When communicating via SimCorp’s internal and external communication channels and online spaces, we expect that employees conduct themselves in ways consistent with this Policy.

Harassment and bullying may have many causes. While it is not necessary to know what has caused harassment or bullying for incidents to be considered inappropriate, it can be helpful to know that actions might be due to unconscious bias or thoughts. The more aware we are of our biases, the more capable we are at addressing them and preventing actions that might be considered harassment and/or bullying.

4. SimCorp’s stance on harassment and bullying

SimCorp acknowledges that both harassment and bullying can reduce equality at work, furthermore, compromising the integrity, dignity, rights, and well-being of our colleagues. Both harassment and bullying can create humiliating, intimidating, and/or hostile work environments for individuals who experience or witness actions. In some jurisdictions around the world, harassment is illegal and can lead to monetary fines, reputational damage for an individual or company, or imprisonment.

SimCorp recognizes the potential implications to mental and/or physical health and well-being as the result of harassment and/or bullying.

We have a zero-tolerance policy for harassment and bullying in our global workplaces, regardless of local legal jurisdictions.

5. What does our zero-tolerance policy mean for you as a SimCorp employee?

Every employee at SimCorp is responsible for promoting and creating a work environment that is free of violence, harassment, and bullying. Every day, we make choices that can include or exclude our colleagues. We also make choices to prevent inappropriate or unwanted behaviors from occurring in our workplace, just as we make choices to take action when we witness or experience perceived harassment or bullying.

As an employee at SimCorp, you are empowered and obligated to:

- Respect your fellow colleagues
- Understand and follow the terms of your employment as outlined in your contract, our Guideline for Good Business Behavior, and this Global Anti-Harassment and Anti-Bullying Policy
- Actively sign your receipt, understanding, and acknowledgement of your responsibility to act in accordance with this Global Anti-Harassment and Anti-Bullying Policy as part of your onboarding process
- Report any concerns or suspicions of harassment or bullying

6. Grievance mechanisms

If you experience harassment or bullying at SimCorp, you have several options:

- **Speak up:** We encourage employees to have the courage to speak up in the moment - if you feel comfortable doing so. However, we recognize that not every situation makes this safe, easy, or possible. If you do not feel comfortable speaking up at the time the incident occurs, you can still take impactful action.

- **Consult a trusted manager:** Depending on the situation, you might feel comfortable confiding in a manager. This could be your own manager, your manager's manager, or another leader who can support and direct you on appropriate actions. We encourage all individuals to recognize the potential sensitivity of the situation and act with confidentiality.
- **Confide in HR:** You are always welcome to reach out to your local or global Human Resources (HR) partner. HR is obliged to treat all inquiries seriously; act on any suspicions of workplace harassment or bullying; treat discussions confidentially, and can advise you on further actions to take, if any.
- **Report:** If you believe the incident is in violation of our policies, warrants an investigation, and/or do not feel comfortable taking any of the above actions, we encourage you to use our [Whistleblower hotline](#) to file a strictly confidential report. SimCorp has a non-retaliation policy as part of our [Whistleblower Policy](#).

No matter the option, we encourage all employees to act in good faith, maintain confidentiality, and help us create an inclusive work environment where everyone can thrive. You should report what you think could be harassment, bullying, or workplace violence as soon as is safely possible.

7. Governance

The Global Anti-Harassment and Anti-Bullying Policy is updated, reviewed, and approved annually by our Board of Directors in collaboration with our Head of HR and Head of DEI. This Policy should be read together with SimCorp's package of corporate policies.

This policy is adopted in Copenhagen
on December 17, 2021.

Board of Directors

Peter Schütze

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About SimCorp

SimCorp offers industry-leading, integrated investment management solutions.

Our platform and ecosystem, comprising partners, services, and third-party connectivity empowers us to provide 40% of the world's top 100 financial companies with the efficiency and flexibility needed to succeed.

With over 25 offices around the world, and more than 2,200 employees, we are a truly global, collaborative team that connects every continent and industry seamlessly.

For more information, see www.simcorp.com