



TBC

# **Employee** Discrimination, Violence and Harassment Policy





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## Preamble

TBC is among the largest employers in Georgia and the region, with millions of customers. Our team's main goal is to make your life easier and constantly improve the quality of our services.

We aim to deliver the best customer experience to large numbers of people daily. However, in exceptional cases, our team members may be exposed to an inappropriate, unethical communication behavior exhibited by consumers. To address these situations, we developed the Staff Protection Policy to help us maintain a healthy and safe workplace environment while providing top-quality services to our clients. The Policy is aimed at protecting our team members from consumer aggression and unethical behavior and ensuring their safety, without restricting consumer rights, which is likewise provided for in the Policy.



# Representations

**TBC Bank JSC** aims to create a healthy, positive and safe environment free of any form of discrimination, violence and harassment, where all individuals are treated with dignity and respect. TBC has in place all relevant policies<sup>1</sup>, including the present one.

**Discrimination, violence and harassment** are strictly prohibited, whatever the circumstances.

**Every person has the right** to freedom and protection from harassment, violence and discrimination.

**TBC Bank JSC** denounces any negative act, whether harassment, discrimination or any form of violence, including threats and bullying, which may be discriminatory and/or infringe upon or interfere with human rights, or create a hostile, humiliating and/or intimidating environment.

Creating a safe and healthy environment in the workplace as well as in customer relations is among top **organizational values**.

**Business development and support** is not viable against a backdrop of customer aggression. TBC Bank adheres to the principles of workplace ethics and professionalism and has in place a customer complaint handling procedure, as well as all relevant mechanisms in case the Bank violates any provision of an agreement made with the customer. These mechanisms allow our employees to draw a line between customer complaints and negative acts, between dissatisfied and abusive customers.

<sup>1</sup> The Code of Conduct  
The Code of Ethics  
Human Rights Protection Policy





# Acts Denounced and Definitions

**Discrimination** – any form of prejudiced treatment on the grounds of race, colour, ethnicity, nationality, origin, social status, property, place of residence, age, sex/ gender, sexual orientation, disability, religion, membership to a social, political or other groups, marital status, job position, political or other beliefs.

**Harassment** – epithets, remarks, sarcasm or innuendos associated with a person’s race, gender identity, gender expression, sex, disability, sexual orientation, religion, age, etc.; display, publication, dissemination or posting of offensive pictures, images, graffiti and other materials in print or electronic forms; nagging, humiliation and ridicule; depreciative comments about one’s characteristics, such as clothes, speech, etc., which becomes a target of discrimination; taking one’s pictures or videos or recording one’s voice without one’s consent and/or dissemination, publication and/or transfer of the materials to a third party.

**Sexual and gender-based harassment** – a kind of harassment manifested as gender-related comments about an individual’s physical characteristics or mannerisms; paternalism based on gender, which a person feels undermines his or her self-respect or position of responsibility; unwelcome physical contact; suggestive or offensive remarks or innuendoes about members of a specific gender; propositions of physical intimacy; gender-related verbal abuse, threats, or taunting; leering or inappropriate staring; bragging about sexual prowess; demands for dates or sexual favours; offensive jokes or comments of a sexual nature about an employee or a client; rough and vulgar humor or language related to gender; display of sexually offensive pictures, graffiti, or other materials (including through electronic devices); discriminatory harassment, remarks or conduct made to a person because of his or her gender, age, etc.

**Intimidation** - a form of harassment manifested as verbal abuse and psychological pressure, including any intimidating or embarrassing conduct that is unjustifiable in terms of social and moral reasoning.

**Violence** – a person’s aggression against another person, with physical or psychological impacts, including but not limited to any action or word that can debase and/or harm a person or infringe upon his/her rights.

**Threat** – a form of violence; an oral or written statement of an intention to inflict harm, harass or commit violence against a person or property.

**Bullying** – any form of violence described above if recurrent and/or continuous.

**Negative Act** – for the purpose of this Policy, “Negative Act” refers to any action described above.

## Policy Goals

This Policy aims to prevent any form of discrimination, harassment and violence perpetrated by customers. It has been designed to contribute to human rights protection and establish standards and principles of workplace conduct.

Every TBC employee, whether full-time, part-time, temporary or probationary, as well as every TBC Academy student, intern and service provider – has the right to freedom from discrimination, harassment and violence.

Obligation against discrimination, harassment and violence applies everywhere, whether inside or outside of office premises, during a business/field trip, at a business event or in any situation related to and/or resulting from the performance of one's professional duties.

The Employee Discrimination, Harassment and Violence Policy applies to all customers and everyone with whom our employees have business relations when providing services.

## Obligations under the Policy

All individuals who use, have used or plan to use TBC Bank's services, as well as all TBC employees, are obliged to comply with this Policy through full cooperation and denouncement of discrimination, harassment and violence.

If a discrimination, harassment and violence complaint is filed, the company will immediately initiate an inquiry into the case so that discrimination, harassment or violence is not left unaddressed.

If an act of discrimination, harassment and violence is confirmed, TBC Bank reserves the right to respond through taking legal action, terminating contractual relations with the customer and/or refusing new services.



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