

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28**Prepared on:**

03.01.2022 r.

Signature

Specjalista  
ds. Kadr i Płac  
*Małgorzata Sobczyk*

**Date of update:**

21.03.2022 r.

Signature

Dyrektor  
ds. Kadr i Płac  
*Joanna Adaszek*

**Applicable from 24.01.2022****Date of approval of the update:**

23.03.2022 r.

Signature

WŁAŚCICIEL  
*Piotr Wychowalek*

**Chapter I****General provisions**

§1. The policy of counteracting mobbing, discrimination and abuse and other undesired behavior in F.H. "Nowalijka" Piotr Wychowalek hereinafter referred to as Policy, shall be established to assure the realization of art. 94(3) of the act of 26 June 1974 Labor code (J. of L of 2016, it. 1666 as amended) and the act of 3 December 2010 on implemented some provisions of the European Union in the scope of equal treating (J of L of 2016, it. 1219).

§2. The provisions of the Policy aim at protecting the non-property interests of the Employees employed on the basis of the employment in F.H. "Nowalijka" Piotr Wychowalek and their personal assets against mobbing, discrimination and abuse and other undesired behavior in the workplace or connected with the work.

§3. The procedures are used also to the natural persons not being employees and performing in F.H. "Nowalijka" Piotr Wychowalek the services on the basis of the civil legal agreements and to other persons providing work for F.H. "Nowalijka" Piotr Wychowalek as intern.

§4. The policy defines the principles of counteracting the phenomena of mobbing, discrimination and abuse and other undesired behavior in F.H. "Nowalijka" Piotr Wychowalek and the mode of conduct in case of suspicion of them to occur, including the intervention activities and leveling the effects stated in the force majeure of the pathologies indicated in organization.

§5. The principles of conduct defined in the Policy are not contradictory to the provisions concerning using by the Employees the measures of legal protection defined in commonly applicable law provisions

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28**

## Chapter II

### Definitions

§6. Whenever it is said in the Policy about:

**1. Mobbing** – it shall be understood by the activities or behavior concerning the Employee or referred against the Employee, involving persistent and long-term harassing or threatening the Employee, causing or aiming at humiliating him or making fun of him, isolating him or eliminating from the team of co-workers.

**2. Discrimination** – it shall be understood as the situation in which the person in particular due to sex, race, ethnic origin, nationality, religion, convictions, view, disability, age, trade unions membership, political beliefs, or sexual orientation is treated less favorably than they used to be or would be treated as another person in the comparable situation.


**3. Abuse** – it shall be understood as the form of discrimination involving undesired behavior, the purpose or effect being the infringement of dignity of the Employee and creating towards him the threatening, hostile, humiliating atmosphere.

**4. Sexual abuse** – it shall be understood as the form of discrimination involving undesired behavior with the sexual nature or referring to the sex of the Employee the purpose being or the effect to infringe the dignity of the Employee, in particular creating towards him the threatening, hostile, humiliating atmosphere; such behavior may include physical, verbal or non-verbal elements.

**5. Uneven treatment** – it shall be understood as worse treatment of the person or group of persons in particular due to the sex, race, ethnical origin, nationality, religion, views, disability, age, trade unions membership, political views or sexual orientation

**6. Undesired behavior** – it shall be understood as each hostile behavior or action, aware or unaware, having negative impact on the Employees of F.H. "Nowalijka" Piotr Wychowalek. The undesired behavior infringes the principles of good customs as well as disturb or prevent performance of the official obligations they include i.a.: seeking to eliminate from the circle of co-workers, making the communication difficult, stultification, isolating, attacks to the professional competences.

**7. Respecting dignity and other personal goods of the employee** – it shall be understood as the liability of the Employee to respect the dignity of a human being a party to the employment and other non-property rights protected with law granted to each natural person and legal person i.a. health, freedom, image, freedom of conscience.

	<b>COMPANY POLICY</b>		Page 3
Policy number <b>PF-02</b>	Name of the policy <b>Anti-mobbing, anti-discrimination and anti-abuse policy  and policy against other undesired behavior in F.H.  Nowalijka</b>	Policy Version <b>2</b>	Number of pages 28

**8. Persons of trust** – it shall be understood as a group of persons appointed by the Employer from whom the members to the Explanation Commission are chosen.

**9. Explanation Commission** – it shall be understood as the internal body operating in F.H. “Nowalijka” Piotr Wychowalek the task being combating the undesired phenomena referred to in §6 point 1 – 6, conducting the explanation procedures and considering the employee complaints.

**10. Employers** – it shall be understood as F.H. “Nowalijka” represented by Piotr Wychowalek.

**11. Employee** – it shall be understood as each natural person employed on the basis of employment in F.H. “Nowalijka” Piotr Wychowalek. The definition of Employee in the Policy, also includes the persons listed in §3.

**12. Labor Law** – it shall also be understood as the provisions of the Labor Code and provisions of other legal acts, defining rights and obligations of the Employees and Employers, including collection systems, regulations and articles of association defining the rights and obligations of the parties to employment.

**13. Labor Code** – it shall be understood as the act of 26 June 1974 Labor Code (unified text J. of L of 2014 it. 1502 as amended) hereinafter referred to as KP

**14. Policy** it shall be understood as the Policy of counteracting mobbing, discrimination and abuse and other undesired behavior in F.H. “Nowalijka” Piotr Wychowalek.

**15. Informal path** – it shall be understood as the attempt to solve the problem amicably without lodging the complaint.

**16. Formal path** – it shall be understood as the stage in which the solving of the problem is connected with the necessity to lodge the complaint to the Conformity Proxy.

**17. Complaint** – it shall be understood as reporting in writing, the referral to the Conformity Proxy which is connected with the necessity to choose the composition of the Explanation Commission and constituting the explanation procedure

**18. Report** – it shall be understood as the information transferred by the indicated internal canals on suspicion of any phenomenon undesired listed in §6 point 1-6 of the Policy.

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28****Chapter III****Rights and obligations of the employer and employee****§7. Obligations of the employer:**

1. The employer shall be obliged to counteract in F.H. "Nowalijka" Piotr Wychowalek.
2. The relations between the Employer, Employees, Interns, Practitioners and natural persons performing in F.H. "Nowalijka" Piotr Wychowalek services on the basis of civil-legal agreements are based on the principle of respect and tolerance and respecting personal dignity.
3. It is forbidden to use in an unjust manner the privileged professional position in the Superior-Employee relation.
4. The Employer shall be obliged to take all activities foreseen by the law provisions, including in particular Labor Code, towards the persons being perpetrators of the undesired phenomena, referred to in §6 point 1-6.
5. The Employer shall be obliged to take all activities foreseen by the law, including the activities described in the Policy, in order to level the effects of social undesired phenomena, referred to as in §6 point 1-6, including to take the intervention activities and grant the aid to the victim of these phenomena.
6. The Employee shall be obliged to undertake the activities in each case of making the Report/complaint but also in each case to take information on existing any undesired phenomena in §6 point 1-6 from another source than the Report/complaint.

**§8. Rights and obligations of employees:**

1. The Employees are obliged to comply with the principles of non-discrimination and refraining from behavior of mobbing nature towards their co-workers, subordinates and their superiors and to be directed with the principle of respecting the dignity and other personal goods in these relations.
2. Using mobbing, discriminations, abuse and other undesired behavior infringing the dignity and other persons goods of the Employee as well as posing the situations encouraging to such behavior constitutes serious infringement of basic employee obligations within the meaning of art. 52 § 1 point KP.
3. All the employees of F.H. "Nowalijka" Piotr Wychowalek are obliged to proper reacting to the notices symptoms of discrimination, mobbing, abuse or other undesired behavior

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28**

infringing the personal goods of the employees, taking place in F.H. "Nowalijka" Piotr Wychowalek

4. Each employee has the obligation to familiarize with the Policy and submit proper statement to the HR Department.
5. Each Employee who will recognize that he experienced the behavior listed in the Policy has the right to take by the Employer the activities aiming at cessation as well as cancelling the effects of the behavior.
6. Using by the Employee the rights indicated in point 5 of the paragraph in no way excludes the right of the Employee to seek legal protection on the basis of the applicable law provisions. Using by the Employee such means of legal protection is not either depending on earlier application of the provisions of the Policy.
7. Each Employee who possesses or will learn about the cases of mobbing, discrimination, abuse or other undesired behavior is entitles to make the Report.

#### **Chapter IV**

#### **The fulfillment of the obligations of the employer resulting from art. 94(3) §1 KP, 11(1) KP, 18(3a) KP in F.H. "Nowalijka" Piotr Wychowalek**

- §9.1. Prevention activities in F.H. "Nowalijka" Piotr Wychowalek is a set of activities which aim at preventing the undesired phenomena, referred to in §6 point 1-6 of the Policy.
2. In F.H. "Nowalijka" Piotr Wychowalek the basic methods of fulfilling by the Employer the obligation to counteract the undesired phenomena referred to in §6 point 1 -6 of the Policy, include in particular:
    - a) introducing and application of the Code of Ethics, which aims at affecting the shaping the principles of social life in the Company, disseminate the proper attitudes among the Employees and introduce pattern behavior both in employee relations and with clients;
    - b) detecting the conflicts earlier and making proper interventions by means of regular and active monitoring the atmosphere, relations, flow of information supported by anonymous surveys for the Employees and the channels for reporting made available i.a.: company reporting box, email address made available [etyka.info@nowalijka.pl](mailto:etyka.info@nowalijka.pl), traditional correspondence directed to the Conformity Proxy,
    - c) making aware and making the Employees sensitive to the unethical, undesired behavior which infringes the dignity and other personal goods of the employees;

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28**

- d) providing the Employees with the texts of the provisions concerning mobbing, equal treatment and abuse as well as creating and dissemination information materials in these issues;
- e) establishing the obligation of training the Employees from the scope of mobbing, discrimination and abuse and counteracting these phenomena.

## **Chapter VI**

### **Procedures in case of Mobbing, Discrimination, Abuse including Sexual Abuse or other undesired behavior in the Workplace**

§10.1. In case of any suspicion of any phenomenon undesired listed in §6 point 1-6, the Employee may by themselves take the attempts of its amicable completion in informal manner or make the report and then use the informal path and formal one. The diagram of conduct in case of suspicion of the undesired phenomena to occur listed in § 6 point 1-6 of the Policy, was presented in attachment number 1 to the Policy.

2. The report referred to in §10 it. 1 may be submitted:
  - a) by means of the Employer, Director, Superior, Manager or other third persons of trust;
  - b) At the personal meeting with the Conformity Proxy organized within 7 days from learning about the possibility of irregularity to occur;
  - c) To the email address: [etyka.info@nowalijka.pl](mailto:etyka.info@nowalijka.pl)
  - d) The for of letter prepared and sent with the traditional correspondence to the address of the company: ul.Życzliwa 17, Piotrków Trybunalski 97-300, directed to the Conformity Proxy;
  - e) Placing the written report in paper form in the company reporting box, placed in the easily available place, assuring confidentiality.
3. The box referred to in §10 it. 2 point f, is served by the Conformity Proxy indicated by the Employer and it is empties once a week. The Conformity Proxy authorized to empty the box shall be obliged to keep in confidentiality data and information concerning the report.
4. After obtaining the report on existing any phenomenon undesired listed in §6 pint 1-6 the Conformity Proxy if possible organises the meeting with the reporting person for initial review and starting the attempt to solve the conflict by means of using the formal or informal path.
5. The informal stage involves starting the attempt to solve the conflict by means of:
  - a) individual conversation with the party/parties to the existing phenomena;

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28

b) conversation with the participation of third persons e.g. : superior, co-workers, Conformity Proxy;

c) apply to the Manager, Superior or the person holding the higher position in order to make the analysis of the situation and obtain the support in solving the existing conflict, i.a. by means of granting the information in the issue of recognizing and reacting in these situations, conducting the meeting with the Employee suspected with being the perpetrator of the undesired phenomena, referred to in §6 point 1-6 of the Policy.

**§11.1.** Each Employee who thinks that they became the victim of mobbing discrimination, abuse, including sexual, is entitled to the right to use the formal path and lodge the complaint to the Conformity Proxy. The pattern of the complaint is defined by two attachments to the Policy:

- a) attachment number 2a mobbing complaint;
- b) attachment number 2 complaint for discrimination/abuse/sexual abuse.

2. The complaint, referred to in §11 it. 1 may be lodged:

- a) at the personal meeting with the Conformity Proxy organizes within 7 days from learning about the possibility for the irregularity to occur;
- b) to the email address [etyka.info@nowalijka.pl](mailto:etyka.info@nowalijka.pl);
- c) the form of the letter prepared and sent by the traditional correspondence to the address of the company: ul.Życzliwa 17, Piotrków Trybunalski 97-300 directed to the Conformity Proxy;
- d) placing written report in paper form in the company report box located in an easily available place, assuring confidentiality.

3. The box concerning infringements, referred to in §11, it. 2 points d, is serviced by the Conformity Proxy, in the manner described in §10 it. 3 of the Policy.

4. The complaint should:

- a) be prepared in writing;
- b) attached with a date;
- c) handwritten signed by the Employee;
- d) contain the description of actual state of affairs which activities or behavior took place;
- e) quote the evidence to support the situation described;
- f) indicate the perpetrator/perpetrators and witnesses of mobbing, discrimination or sexual abuse;

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28

- g) contain the description of the activities which were undertaken to eliminate the undesired phenomenon, presented in the complaint.
5. Upon lodging the complaint, the information contained therein is of a secret nature connected with performing the official obligations and may be disclosed only to the persons taking place in the procedure.
6. Before lodging the complaint, the Employee may by themselves explain all the circumstances and seek for amicable solution of a dispute, using the informal way .

## **Chapter VII**

### **Appointing Persons of Trust**

- §12.1. The persons of trust are appointed by the Employer for the period of 5 years.
2. From among the Persons of Trust appointed by the Employer, the Proxy chooses three members to the Explanation Commission.
3. The Persons of Trust should be familiarized with the problems of mobbing and trained in the scope of the procedures and provisions concerning the protection of personal data in F.H. "Nowalijka" Piotr Wychowalek.
4. The specimen of the form on appointing the persons of trust by the Employer is defined by attachment number 3 to the Policy.
5. The Person of Trust ceases to be such upon:
- termination of employment;
  - being recalled by the Employer;
  - death.
6. The recalling of the Person of trust may take place in the case of:
- disease or long-term absence preventing from performing the obligations;
  - resignation of fulfilling the function of the Person of Trust;
  - being convicted with the final and valid judgment for the voluntary crime.

## **Chapter VIII**

### **Procedure of Explanation Commission**



Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28**

- §13.1. The procedure in case of mobbing, discrimination or abuse including sexual abuse shall be conducted by the Explanation Commission.
2. In the composition of the Commission, referred to in §13 it. 1 there are four members.
  3. The composition of the Explanation Commission is selected each time to examine the defined case, marked with the number.
  4. The permanent member in the composition of the Commission is the Conformity Proxy, who selected other three members among the Persons of Trust. In their selection he must be directed by impartiality, confidentiality, effectiveness and inertia operation.
  5. The Composition of the Explanation Commission recommended to examine the defined case, marked with the number approved the Employer.
  6. The form pattern on selecting and establishing the personal composition of the Explanation Commission shall be defined by the attachment number to the Policy.
  7. The Explanation Commission may not include the Person of Trust who:
    - a) was indicated as the witness to the procedure;
    - b) is a spouse, relative, next of kin to the second degree in relation to the person involved in the event being the subject of the procedure or as to whom there is justified presumption as to the impartiality in the case;
    - c) remains in relation to the official superiority to the reporting or reported person as the perpetrator of the mobbing, discrimination actions or other behavior undesired
  8. The Commission takes sessions at the meetings in full composition.
  9. The tasks of the Explanation Commission include i.a.:
    - a) Collecting the documentation connected with the complaint and necessary to conduct the procedure;
    - b) Providing the assistance to the parties of the conflict in establishing the dialogue and obtaining the agreement;
    - c) Establishing whether there was mobbing, discrimination or abuse;
    - d) Transferring to the Employer the protocol on the procedure, information and documents necessary to implement the disciplinary means, foreseen by the law;
    - e) after collecting all information necessary to assess the actual state of affairs, formulate proposals as to preventing and removing the effects of mobbing, discrimination, abuse.
  10. The Membership in the Commission expires:
    - a) as a result of termination of employment;
    - b) in case of being recalled by the Employer

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28

- c) in case of death of the member of the Commission.
11. The change of the member may take place in the following situations:
- d) the disease of the member of the Commission or his long-term absence preventing the performance of the obligations of the member of the Commission;
  - e) resignation of fulfilling the function of the member of the Commission;
  - f) if the report of the complaint refers to the person of the member of the Commission
  - g) convicting him with the valid judgment for the voluntary crime.
12. In the place of the excluded member of the Explanation Commission, the Conformity Proxy selects another person, completing the Explanation Commission to the full composition, defined in it. 2.
13. The Commission realizes its tasks in accordance with the principles of: impartiality, confidentiality, immediate operation and independence.
14. The procedure against the Explanation Commission is covered with confidentiality, involving that no person participating in the procedure is authorized to disclose the facts, about which it learnt in the course of the procedure nor as to the disclosure of the information about the fact, place and time and the course of the explanation procedure.

**§14.1** The Commission starts the explanatory procedure immediately after obtaining the complaint.

2. In the event when the complaint does not contain the data, referred to in §11, it. 4 the Commission calls the complainant to complete them within 7 days of the delivery of the summons.
3. Failing to complete the shortages within the indicated date may cause leaving by the Commission the complaint without consideration. The final decision will be made by the chairman of the Commission.
4. The Commission takes meetings at the sessions, convened by the chairman pursuant to the needs of the procedure conducted.
5. At the first meeting the members submit the liability to keep confidentiality, the specimen of which is defined in the attachment number 5 and the statement, the specimen of which is defined in attachment number 6 to the Policy.
6. The witnesses who in the course of the procedure are heard have the obligation to sign the liability on keeping the circumstances in confidentiality, with whom they familiarized during the hearing. The specimen of liability on keeping the circumstances in confidentiality shall be defined by the attachment number 7 to the Policy.

Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28

7. The Commission shall be obliged in particular to:

- a) help the parties in establishing the dialogue and achieving the agreement if it is not in contradiction to the good of the Employees or the Employer;
- b) reliability in collecting information connected with the complaint;
- c) organizing and conducting the explanatory conversations;
- d) protocoling the explanation conversations;
- e) collecting documentation connected with the complaint and necessary to conduct the procedure.

8. After hearing the complainant, the perpetrator and witnesses, after considering the collected evidence, the Commission makes the assessment of the reasonability of the complaint and summary of works with recommendations in the scope of necessary actions and transfers to the Employer in order to familiarize with the arrangements of the Commission.

**§15.1.** The Commission adopts the resolutions with majority of the votes.

2. The member of the Commission may submit the separate opinion with justification of the protocol, in the event when it is not consistent with the final conclusions of the Commission.

**§16.1** After completing the works, the Members of the Commission prepare the protocol which constitutes the summary of the whole explanation procedure and is signed by all Members of the persons taking in the procedure. The specimen of the protocol constitutes the attachment number 8 to the Policy.

2. The Protocol should contain i.a. a description of the activities, own opinion in the issues of existing the fact of mobbing, discrimination or abuse, any recommendations for the Employer.
3. The parties to the explanatory procedure, namely the Employer, as a result of which by the notification, the mobbing was used, discrimination or abuse and the Employee is being guilt will familiarize with the text of the protocol.

**§17.** In the situation of recognizing the complaint as the reasonable the Employer may use towards the perpetrator of mobbing or discrimination the proper means foreseen by the applicable labor law provisions.

**§18.1.** On the basis of the reports undesired behavior indicated in the Policy, F.H. "Nowalijka" Piotr Wychowalek conducts the Register of Internal Reports, which contains:


Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
28

- a) Case number;
  - b) Type of the undesired behavior;
  - c) Date of making the report;
  - d) Information on consequences in the case;
  - e) Completion date in the case.
2. Each report is entered into the Register of Internal Reports independent on the further course of the case.
  3. The Register of the Internal Reports is conducted in the paper form in the manner assuring integrity and data protection including data confidentiality of the persons reporting and those to whom the report refers.
  4. For conducting the Register of Internal Reports the Conformity Proxy is responsible.
  5. The authorization into sight in the Register of the Internal reports in whole or in parts shall be granted by the Conformity Proxy.
  6. The specimen to the Register of the Internal Reports constitutes the attachment number 9 to the Policy.

## **Chapter IX**

### **Final provisions**

- §19.1 The policy counteracting mobbing, discrimination and abuse and in undesired behavior in F.H. "Nowalijka" Piotr Wychowalek shall come into force within 7 days of its signing.
2. All changes of the Policy shall require written form.
  3. These internal procedures in no degree exclude the do nor deprive the Employee of the right to seek the claims by virtue of separate law provisions.

	<b>COMPANY POLICY</b>		Page 13
Policy number <b>PF-02</b>	Name of the policy <b>Anti-mobbing, anti-discrimination and anti-abuse policy  and policy against other undesired behavior in F.H.  Nowalijka</b>		Policy Version <b>2</b>  Number of pages 28

**Documents connected with the anti-mobbing, discrimination and assault and other undesirable attitude Policy in F.H. "Nowalijka" Piotr Wychowalek:**

**1. Attachments:**

The attachment no.1 Proceeding scheme

The attachment no.2a to PF-02 Employee's claim to Employer in case of mobbing occurrence at work

The attachment no. 2b to PF-02 Employee's claim to Employer in case of mobbing, discrimination and assault and other undesirable behavior occurrence at work

The attachment no. 3 to PF-02 Person of trust appointment form

The attachment no. 4 to PF-02 Explanation Board members appointment form

The attachment no. 5 to PF-02 Obligation of Confidentiality of Explanation Board Member

The attachment no. 6 to PF-02 Explanation Board Member Declaration

The attachment no. 7 to PF-02 Obligation of Confidentiality of circumstances

The attachment no. 8 to PF-02 Minutes of the Explanation Board Meeting form

The attachment no. 9 to PF-02 Internal Report Registry form

**2. Documents:**

None

**3. Registries**

None

Policy number  
**PF-02**

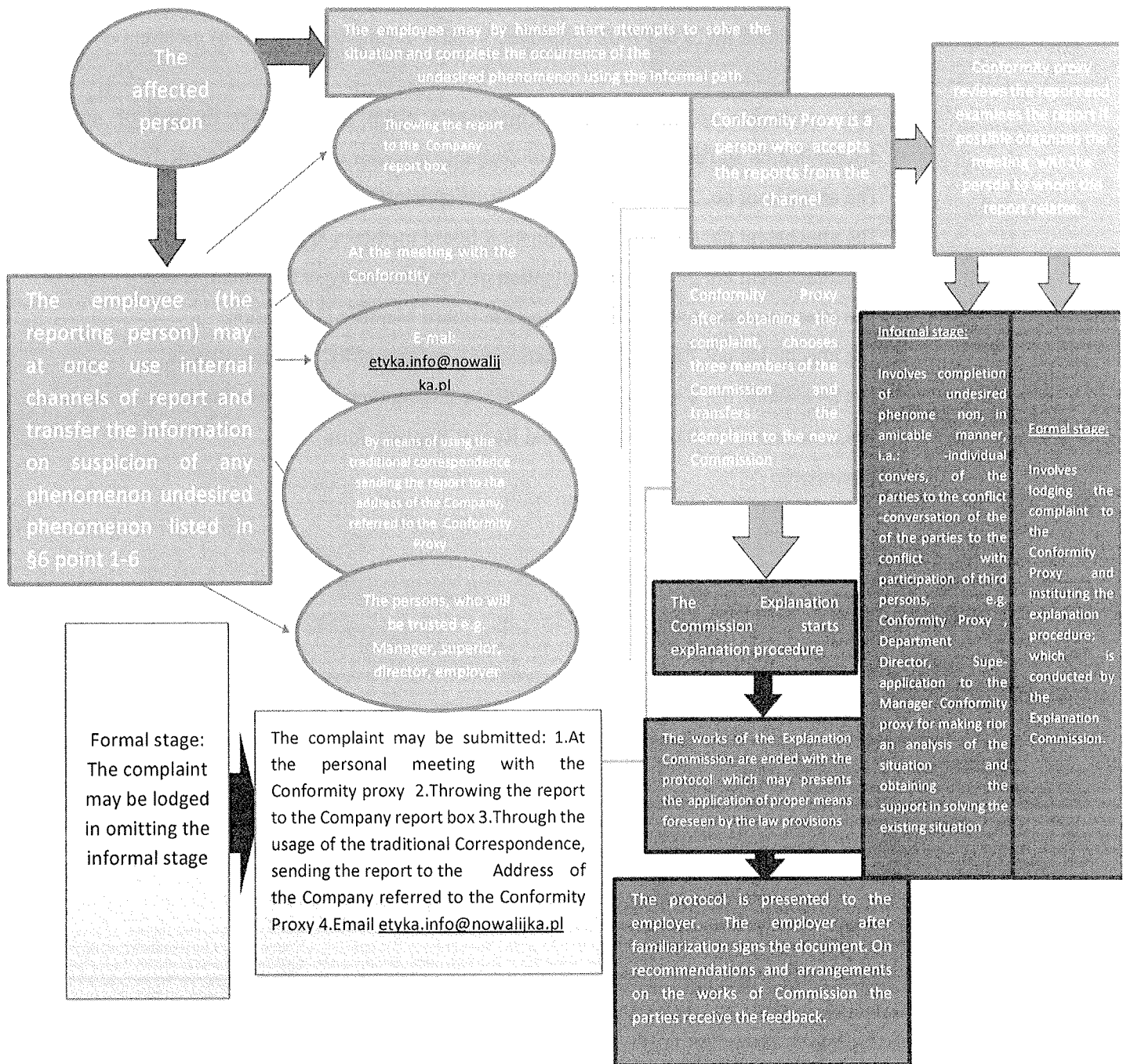
Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
**28**

*Attachment number 1 to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

The diagram of the procedure in case of suspicion of mobbing, discrimination and assault and other undesirable attitudes in F.H. "Nowalijka" Piotr Wychowalek



Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 2a to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

**A MOBBING CLAIM**

1. Name and surname of a person reporting, a job title:

.....  
 .....  
 .....

2. Name and surname a person mobbing, a job title:

.....  
 .....  
 .....  
 .....

3. A work relation between a person/person mentioned in the point 1 and 2:

.....  
 .....  
 .....

4. A description of a mobbing attitudes (all situations and attitudes which took place to be described):

- a) a continuous and irrational critics of work performed
- b) limited abilities of expression, no ability to take the floor
- c) reacting on report given by a person by shouting and aggression
- d) isolating from other employees
- e) a permanent contesting each decision
- f) ordering pointless works
- g) ordering tasks below a person's skills
- h) assigning excessive amount of tasks
- i) assigning works harmful for health
- j) reclaiming works ordered without any reason
- k) no tasks to be done
- l) withholding significant information/necessary to perform tasks properly against employees
- m) assigning tasks with unreal deadlines to be made
- n) unreasonable work orders after work on days off





Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

7. Alternative reasons, including witnesses of these mobbing attitudes:

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....

8. Reasons of mobbing attitudes:

.....  
.....  
.....  
.....

Piotrków Trybunalski, on.....

.....  
(a legible signature of a reporting person)

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 2b to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

**A DISCRIMINATION /AN ASSAULT/  
A SEXUAL ASSAULT CLAIM**

1. Name and surname of a person reporting, a job title:

.....  
.....  
.....

2. Name and surname a person who behaves in the way which might be considered as a discrimination/an assault/a sexual assault, a job title:

.....  
.....

3. A description of circumstances and attitudes stating an occurrence of a discrimination ( direct, indirect due to a sex, an age, a disability, a race, a religion, a nationality, political opinion, a relation, an ethnic origin, a sexual orientation, an employment for a definite or in definite period, a full or a part time job), an assault or a sexual assault:

.....  
.....  
.....  
.....  
.....

4. A description of previous actions undertaken by a person making a claim:

.....  
.....  
.....  
.....  
.....

5. Evidence given by a person making a claim as a proof of a factual state described:

.....  
.....  
.....  
.....  
.....

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

.....  
.....  
6. Additional information and notes:  
.....  
.....  
.....  
.....

Piotrków Trybunalski, on.....

.....  
(a legible signature of a reporting person)

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 3 to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

Piotrków Trybunalski, on.....

**A PERSON OF TRUST APPOINTMENT**

**on the basis of § 12, it. 1 anti-mobbing, discrimination and assault and other  
undesirable behavior Policy in F.H. "Nowalijka"**

- 1.....
- 2.....
- 3.....
- 4.....
- 5.....
- 6.....

.....

(Employer's signature)

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 4 to the the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

Piotrków Trybunalski, on.....

**EXPLANATION BOARD COMPOSITION**

**due to the case no.....**

Proceeding concerning the claim no..... in conducted by the  
Explanation Board composed of:

1. Consistency Representative and three persons of trust appointed by the Consistency Representative
2. ....
3. ....
4. ....

The Explanation Board conducts an explanatory proceeding in accordance with the rules specified in the anti-mobbing, discrimination and assault and other undesirable behavior Policy in F.H. Nowalijka.

.....  
(a signature of the Consistency Representative)

I hereby accept a composition of the Explanation Board in the case  
no.....

.....  
(an Employer's signature)

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 4 to the the anti-mobbing, discrimination and assault and other  
undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

Piotrków Trybunalski, on.....

.....  
(name and surname of a member of the Board)

.....  
(a job title of a member of the Board)

**AN OBLIGATION OF CONFIDENTIALITY OF THE EXPLANATION BOARD  
MEMBER**


Due to of being appointed for the member of the Explanation Board dealing with the a  
mobbing/a discrimination/an assault claim, case no.  
.....submitted on  
.....  
(date of a claim submission)

I undertake to:

1. keep all information received due to my membership in the Explanation Board and explanatory proceeding conducted in secret and do not disclose them to third parties,
2. not disseminate any information, messages and materials referring to a particular case in any form.

I am aware that breaching above-mentioned obligations may cause bearing a responsibility on the basis of the law.

.....  
(a signature of the Board's member)

	<b>COMPANY POLICY</b>		Page 23
Policy number <b>PF-02</b>	Name of the policy <b>Anti-mobbing, anti-discrimination and anti-abuse policy  and policy against other undesired behavior in F.H.  Nowalijka</b>	Policy Version <b>2</b>	Number of pages 28

*The attachment no. 6 to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

Piotrków Trybunalski, on.....

.....

(name and surname of the Board's member)

.....

(a job title of the Board's member)

#### DECLARATION OF THE BOARD'S MEMBER ON IMPARTIALITY

Due to of being appointed for the member of the Explanation Board dealing with the a  
mobbing/a discrimination/an assault claim, case no.  
.....submitted

on.....

(date of submission)

I hereby declare that:

1. I am not a husband, a relative or in law – up to the second degree included – of any person who this case refers,
2. I am not in any legal or actual relation that could raise any doubts due to my impartiality.

.....

(a signature of the Board's member)

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 7 to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

Piotrków Trybunalski, on.....

.....  
(name and surname of an employee)

.....  
(a job title)

### **AN OBLIGATION OF CONFIDENTIALITY**

I, undersigned ....., employed in F.H. Nowalijka Piotr Wychowalek, on the position ..... hereby declare, as the witness in the mobbing/discrimination/sexual assault that I undertake to keep all information received due to my membership in the Explanation Board and explanatory proceeding conducted in secret and do not disclose them to third parties, especially not to disseminate any information, messages and materials referring to a particular case in any form.

I am aware that breaching above-mentioned obligations may cause bearing a responsibility on the basis of the law.

.....  
(date and signature of an employee)



Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

*The attachment no. 8 to the anti-mobbing, discrimination and assault and other undesirable attitudes Policy in F.H. "Nowalijka" Piotr Wychowalek*

**MINUTES of  
the Explanation Board meeting  
case no.....**

appointed by Piotr Wychowalek as of.....to conduct the proceeding  
due to the mobbing claim submitted by:

.....  
.....  
.....  
.....

(name and surname, a job title, an organizational unit)

on.....

The Board composed of:

- 1) .....  
Chairman of the Board
- 2) .....  
Member of the Board
- 3) .....  
Member of the Board
- 4) .....  
Member of the Board

1. Date of the claim submission:

.....

2. Date of proceeding commenced by the Board:

.....

3. Description of the claim (action or attitude considered by the applicant as a mobbing, a  
discrimination, an assault, a sexual assault, pointing an offender or offenders, evidence)  
according to the employee's claim:

.....  
.....  
.....  
.....  
.....

Policy number  
**PF-02**

Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**

Policy  
Version  
**2**

Number of  
pages  
28

.....  
.....  
Explanations of the applicant as of  
.....  
.....  
.....  
.....  
.....  
.....

Due to accepting/rejecting the claim I am asking for commencement of the following actions:  
.....  
.....  
.....  
.....  
.....  
.....

Piotrków Trybunalski, on .....

Legible signature of the Board's members:  
.....  
.....  
.....

I have acknowledged with the content of the Board's minutes as of.....

.....  
(a signature of the Employer)



Policy number  
**PF-02**Name of the policy  
**Anti-mobbing, anti-discrimination and anti-abuse policy  
and policy against other undesired behavior in F.H.  
Nowalijka**Policy  
Version  
**2**Number of  
pages  
**28****Information clause for persons experienced by a mobbing, a discrimination, an assault or other undesirable attitudes.**

F.H. "Nowalijka" Piotr Wychowalek as the employer is obliged to fulfill his duties resulting from the labour code, i.e. preventing from a mobbing and a discrimination (hereinafter the attitude). In order to carry out his duties, he specified rules of a social intercourse on the professional ground and therefore taking care of personal assets of employees and an equal treatment in employment. He gathered all these matters in the anti-mobbing, discrimination and assault and other undesirable attitude Policy (hereinafter referred to as the anti-mobbing policy), obliged himself and all employees to observe them. Pursuing the assumptions of the anti-mobbing policy, he assured different canals of registration, therefore giving employees possibility to submit their claims when they experience undesirable attitudes or are witnesses of these actions.

F.H. "Nowalijka" Piotr Wychowalek is the Administrator of personal data and contents acquired from claims, in accordance with art. 13, it. 1 and it. 2 and art. 14, it. 1 and it. 2 GDPR<sup>1</sup> hereby informs that:

1. making a claim You do it voluntarily and freely. If the decision on making a claim is voluntary, it is necessary to place your personal data and other information in a complaint as to grant a supported needed, specify a type of a phenomenon and take reasonable explanatory, remedial and preventive actions;
2. except ordinary data processed, there might be specialized category data what is subject to the content of a claim,
3. he acquired data in a direct and indirect way what means that data included in the claims of a person injured, witnesses and alleged offender may come from a direct owner of this data or another person;
4. taking into account a case interest and a sense of explanatory proceeding, does not provide to the presumed perpetrator whose data was indicated in the report of the source of origin of his data. In accordance with art. 14, par. 15, let. d) information on a person who made a claim is kept in secret by the Administrator subject to the obligation to keep a professional confidentiality at least until the end of an explanatory proceeding;
5. personal data protection means were kept in confidentiality and integrity;
6. processes data and information given in claims for the anti-mobbing policy realization on the basis of legally justified administrator's interest, what is fulfilling duties by an employer resulting from the labour code;
7. in case of any questions and doubts referring to the personal data processing, do not hesitate contact us: [inspektor.rodos@nowalijka.pl](mailto:inspektor.rodos@nowalijka.pl);
8. if you state that personal data processing is illegal and there was a personal data processing breach or an unauthorized disclosure of information, you have the right to make a claim to the supervisory body: the President of the Personal Data Protection, ul. Stawki 2, 00-193 Warszawa, tel. 22 531 03 00.
9. you have the right to an access to your personal data, including getting a copy it, the right to demand to correct, remove it or restrict processing.
10. Your data and information from claims are kept for 3 years from the period of the explanatory proceeding completion;
11. Your data and information included in complaints will be the subject of an internal explanatory proceeding. Depending on the situation, it might be disclosed to legal advisors or public organizations, if arises from the law provisions;
12. Your data and information are not subject to profiling and no automated decision referring to you will be made.

<sup>1</sup> Regulation of the European Parliament and Council (UE) 2016/679 as of 27<sup>th</sup> April 2016 on natural person protection in reference to personal data and free flow of data and repeal of the directive 95/46/EC (general regulation on data protection)