

Global Harassment Policy & Procedure

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Purpose

This policy describes Teva’s policies and procedures to prevent, manage and respond to **Harassment** in the workplace. This policy is a supplement to [Teva’s Code of Conduct](#).

Scope

In Scope:
<ul style="list-style-type: none">Covers all forms of Harassment, including, bullying and Sexual Harassment.

Application

This Policy applies to all Teva employees, including directors, executives, employees and subsidiary and affiliated companies. Teva employees ensures third-party representatives conduct their activities on behalf of Teva in accordance with our standards.

Teva personnel should promptly report any known or suspected violation of this Policy & Procedure or **Applicable Laws and Codes** in accordance with **Teva's Code of Conduct**. Any Teva personnel receiving a report of noncompliance alleging corruption, fraud, or financial misconduct, should promptly forward complete details to **Teva's Office of Business Integrity (OBI)**. Teva will not tolerate retaliation against anyone making a good faith report. Any breach of this Policy & Procedure, including failure to report actual or potential violations, may result in disciplinary measures, up to and including termination of employment.

Guiding Principles

- 1 Teva supports a healthy and safe working environment for its employees that is free from Harassment and other disruptive behaviors.
- 2 Teva encourages its employees to respond to harassing behavior in a timely and meaningful manner.
- 3 Teva believes that its employees have a right to work in an environment free from Harassment, which includes bullying and sexual harassment and commits to maintaining a work environment that does not tolerate Harassment of its employees.

Policy

- a. Teva's company policies are subject to all **Applicable Laws and Codes**.
- b. In case of doubt or ambiguity, seek advice from the **Legal Department**.

Harassment

- a. Harassment constitutes any physical, verbal, or non-verbal act that creates an offensive, hostile, or intimidating work environment.
- b. Examples of Harassment include sexual harassment and may be based on:
 - Race, ethnicity, color, or national origin
 - Age
 - Religion
 - Sexual orientation, sex (pregnancy, childbirth, medical conditions), or sexual stereotypes
 - Gender, gender identity or expression, or transgender status,
 - Disability (physical or mental) or medical condition
 - Genetic information
 - Veteran status or military service
 - Ancestry or citizenship status
 - Political views, or
 - Characteristics protected by law.
- c. Sexual Harassment constitutes any physical, verbal, or non-verbal acts of a sexual nature that creates an offensive, hostile, or intimidating work environment.

Victims and offenders can be of either gender, employees at any position or level, and can include third parties, such as customers or vendors.

Company Standards

Employees must ensure that they comply with the standards outlined below.

- a. Harassment is strictly prohibited.
- b. Prohibited conduct may include:

Prohibited Conduct	Examples
Verbal Conduct	Offensive jokes, threats, slurs, epithets, stereotyping, unwelcome comments about a person’s protected characteristics, or offensive or derogatory comments or voicemails.
Verbal Sexual Harassment	Innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, making sexual comments about appearance, clothing, or body parts; questions or comments about a person’s sexual practices, lewd remarks, threats or demands that a person submit to sexual requests as a condition of continued employment, or offers of employment-related benefits in return for sexual favors; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or “kidding” that is oriented toward a prohibitive form of Harassment.
Physical Conduct	Physically interfering with work or impeding or blocking movements based on a person’s protected characteristics, unnecessary or

	unwanted bodily contact, or non-verbal behavior, such as staring or gestures.
Physical Sexual Harassment	Unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, massaging, groping, and forced sexual intercourse or assault.
Visual Materials	Racially offensive, derogatory or obscene videos, emails, texts, photographs, calendars, posters, cards, cartoons, drawings, gestures, unwelcome notes or letters, or any other written or graphic materials.
Nonverbal sexual harassment	Calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, or other forms of communication that are sexual in nature and offensive.
Inappropriate or offensive digital communications	Digital and/or electronic conduct or communications through media, internet activity or other electronic medium

- c. All employees are responsible for ensuring an environment free from Harassment.
- d. Teva does not tolerate:
 - Any Harassment, abusive conduct, bullying or other intimidating or aggressive behaviour among Teva Personnel, whether or not the basis for the conduct is on a protected category.
 - Harassment, including bullying and Sexual Harassment, that:
 - Interferes with an individual's work performance
 - Creates an intimidating, hostile, or offensive work environment
 - Uses a position of authority to subject anyone to Harassment, including bullying and Sexual Harassment, or
 - Affects any terms, conditions, or benefits of employment.
 - Engaging in Harassment against third parties, such as customers or vendors.
 - Harassment of Teva Personnel by our third parties.

Action will be taken against anyone who harasses others, no matter the level or role of the offender or the victim

Reporting

- a. Teva encourages its employees to promptly report if they feel they have witnessed or experienced Harassment.
- b. All employees in a managerial or supervisory position who receive reports or learn of Harassment, must report the incident for investigation.
- c. HR, Compliance & Ethics and Legal personnel who receive reports or learn of Harassment must also report the incident for investigation.

Make a report to the Manager, Compliance & Ethics, Legal, HR, or through Teva's Office of Business



Breach

Any breach of this policy, including failure to report any violations of this policy or Applicable Laws and Codes, may result in disciplinary measures, up to and including termination of employment.

Retaliation

Teva forbids retaliation against any person for:

- a. Rejecting or protesting Harassment
- b. Making a good faith report about Harassment or retaliation
- c. Participating or cooperating in an investigation of Harassment.

Resources

Name of Resource	Location of Resource
Teva's Code of Conduct	<i>[Insert location]</i>
Human Resources	<i>[Insert contact information]</i>
Legal Department	<i>[Insert contact information]</i>

Glossary

- **Applicable Laws and Codes** – The international, regional, national, and local laws, regulations, competent authorities' decisions and guidelines, and industry codes governing the activity or interaction.