

# ANTI-HARASSMENT & NON-DISCRIMINATION AWARENESS CAMPAIGN

**Company name :** Cargolux Airlines International

**Activity sector :** Transports et entreposage

**Company category :** Grande Entreprise

## Description of the action

Cargolux Airlines defined a policy entirely dedicated to anti-harassment and non-discrimination policy in 2022 in accordance with the terms of Luxembourg labour law (Labour Code and Convention de 2009) and in consultation with staff representatives, for all employees and executives of Cargolux Airlines International S.A. and its subsidiaries. It was approved on May 2022 by the Delegation and Excom. In order for it to come into force, it was established that an awareness-raising campaign and training programs should be carried out for all employees beforehand as below : 1. A mandatory online learning "Workplace Harassment & Discrimination eLearning" (Luxembourg) 2. A visual internal communication carried out in two stages: • 1st phase October – December 2022: one dedicated to raise awareness about how to identify the forms of harassment (moral or sexual) and discrimination • The 2d phase to come in 2023: dedicated to engaging trust about the reporting procedures (speak up).

## Context

The Collective Working Agreement and the code of conduct and Ethics of Cargolux have long included a section on anti-harassment measures. However, the distinction between moral and sexual harassment was not made explicit and discrimination was not developed further. Besides, some training courses briefly included this issue but under broader topics such as ethics, health and safety at work. Through the draft law n°7864/05 amending the Labour Code in order to introduce a provision on protection against moral harassment at workplace, and because Cargolux Airline is a strong believer in equality and acceptance, the company decided to implement a prevention policy- in consultation with staff representatives - which gives the necessary frame to protect workers and managers from moral, sexual harassment and discrimination. This action is part of our diversity policy, as we note that in situations of violence or moral harassment at workplace, discrimination criteria may come into play in certain situations of so-called discriminatory harassment. The 2022 Employee Engagement survey carried out in October also highlights in the open comments the importance of taking seriously the allegations of bullying, harassment or unethical behaviors.

## Objectives

Helping staff to recognize and condemn all forms of harassment: sexual, moral, psychological, discriminatory harassment.  Helping staff to identify the protected grounds of discrimination and recognize direct and indirect discrimination  Fostering a safe working environment to ensure mental health and performance.

## Approach

October from 10 to 16th 2022. • The mandatory online learning : "Workplace Harassment & Discrimination eLearning" (Luxembourg) accessible from October 11th to December 12th Cargolux has decided to dedicate an entire campaign to promoting these principles toward our employees based in Luxembourg and those based in outstations. Indeed, the concepts of sexual, moral harassment and discrimination may seem slightly abstract for the employees and maybe difficult to grasp and define. The Corporate Training team has therefore developed a dedicated e-learning module to explain each one. The comprehensive course highlights the issues surrounding this subject and how to ensure a more inclusive and respectful workplace. Numerous fictitious or real situations (based on Luxembourg or European case law) are given as examples to help with reflection. They are also used in the quizzes that punctuate the e-learning course to ensure that the concepts are well assimilated. • The visual internal communication carried out in two stages It was important for Cargolux to highlight these issues through impactful visuals that highlight the company's engagement for this cause. Raising awareness and making individuals conscious of the repercussions that harassment may have on mental health is a crucial step in putting an end to workplace harassment. To take up the challenge, the Human Resources department and the Corporate Communication department requested the assistance of the communication agency Lola. In order to avoid a one-shot operation, it was decided to extend the awareness campaign over several months and to break it down into

two phases to give the campaign time to permeate the culture in place. □ In a first phase, with the agency, Cargolux started from a strong keystone: if it's unwanted, it's harassment. Harassment is any unwanted behavior, physical or verbal (or even suggested), that makes a reasonable person feel uncomfortable, humiliated, or mentally distressed. We addressed the three different forms of harassment precisely, treating the graphic line element in a unique way. Through this axis, we wanted to address the boundaries that need to be respected among employees in a professional setting. It is a strong emphasis on Cargolux's Code of Conduct and the Policy about its zero tolerance for harassment, in all forms. Both literally and figuratively, the line between what is harassment and what isn't, can be very thin/blurry, like in the real life. And the repeated lines can also suggest the accumulative effect of all three types of harassment (moral sexual and discriminatory), especially moral harassment. The posters were displayed across the Headquarter of Luxembourg, the hangar of Maintenance & Engineering and the Cargo center for 3 months. The videos based on the same concepts and graphic line were broadcast on the intranet and thus reached our 25 outstations around the world. □ In a second phase, in the first quarter 2023, it's foreseen to reach the trust about the reporting procedures. Indeed, in the policy, the CEO reminded that harassment and discrimination represent serious threats to our culture and business encouraging to speak up (victims and witnesses) and to meet confidentially with their line management, when possible, HR or the Equality delegate. • Roles and responsibilities : Person/Group Roles / responsibilities CEO/ExCom Key Stakeholder - Sponsor VP HR Sponsor/Program Owner Corporate Training team (HR) Project training leader Coordinator Sr Employee Experience & Diversity/Inclusion (HR) Subject matter expert Delegation Partner - key stakeholder (Internal) Corporate Communications / CSR Partner (Internal) Company Psychologist Partner (External) Employees Key Stakeholder - Involved & Informed Communication agency Partner ( external) - service provider

## Impact

- Impact quantitatif : □ By mid-December, 1300 employees had completed the training and 438 were still to do so. □ In addition, complaints of alleged harassment or risks of harassment were registered after the launch of the training. • Impact qualitatif □ In the 2022 Employee Engagement survey, we were able to collect feedback on the current campaign. The campaign was well received insofar as it responded to an expectation to take seriously and deal with risk or proven situations. □ However, it also revealed the fears of some employees that the campaign was just a poster campaign with no real means or will behind it. This fear was anticipated by the introduction of a procedure In the long term, Cargolux will keep KPIs on the number of complaints and the number of proven harassment or discrimination.

## « To do »

□ Establish a detailed written procedure both for the informal resolution mechanism and the formal resolution mechanism (with internal investigation) of the situations reported in the complaints. □ Designing training courses at various levels and contents according to the audience concerned (managers, delegation, employees, HR involved in the handling of the complaints)

## « Not to do »

□ It is preferable not to victimize complainants so that they can safeguard their power to act in the informal or formal procedure (with internal investigation)