



APPROVED:  
AB „ROKIŠKIO SŪRIS“  
14 NOVEMBER 2022 BY  
THE DIRECTOR  
ORDER NO 60

## VIOLENCE AND HARASSMENT PREVENTION POLICY

### CHAPTER I GENERAL PROVISIONS

1.1 The Violence and Harassment Prevention Policy (hereinafter referred to as the "Policy") shall regulate the directions of improvement of the relations between the employees of **AB Rokiškio sūris** (hereinafter referred to as the "Company") and the working conditions in accordance with the legislation of the Republic of Lithuania and international legislation and good practice, as well as the preventive measures for the assessment of the working environment in relation to psychosocial risk factors.

1.2 The aim of the Policy is to design and implement effective and efficient preventive measures to protect workers from violence and harassment (including psychological violence and sexual harassment) and to help workers to have a clear and accurate understanding of the potential for violence and harassment at work, to recognise its signs and to be aware of the legal remedies available.

1.3 In order to achieve this objective, **AB Rokiškio sūris** undertakes to:

1.3.1 to create a working environment in which the worker or group of workers is not subjected to hostile, unethical, degrading, humiliating, aggressive, abusive, insulting or insulting acts which violate the honour and dignity, physical or psychological integrity of an individual worker or group of workers, or which are intended to intimidate, embarrass, or disempower the individual worker or group of workers;

1.3.2 not to tolerate any unethical, inappropriate/unacceptable behaviour towards any employee or visitor, regardless of the position held by the employee and/or contribution to the Company's activities;

1.3.3 address the root causes of the existing problem/conflict at work, deal with any reports of psychological violence at work and provide support to the employee who has experienced violence, mobbing and harassment;

1.3.4 train staff to recognise potential situations of psychological violence and explain how to prevent them from occurring;

1.3.5 train managers to spot inappropriate behaviour in themselves and in their staff, to assess the work environment, and to develop measures to prevent psychological violence at work.

1.3.6 ensure confidentiality of information about employees who have experienced violence;

1.4 The Policy has been prepared in accordance with the Labour Code of the Republic of Lithuania, the General Provisions on Occupational Risk Assessment approved by Order No A1-457/V-961 of the Minister of Social Security and Labour of the Republic of Lithuania and the Minister of Health of the Republic of Lithuania of 25 October 2012, and the Methodological Guidelines on the Investigation of Occupational Risk Factors in Psychosocial Occupations approved by the Minister of Health of the Republic of Lithuania and the Minister of Social Security and Labour of the Republic of Lithuania of 2005. V-699/A1-241 of 24 August, the Law on Equal Opportunities of the Republic of Lithuania, the methodological guidelines for the development of the prevention policy of the State Labour Inspectorate, as well as the International Labour Organisation Convention No. 190 on the Elimination of Violence and Harassment in the Working Environment, and the International Labour Organisation Recommendation No. R206 on the Elimination of Violence and Harassment in the Working Environment.

### CHAPTER II THE CONCEPT OF VIOLENCE AND HARASSMENT

1. Violence and harassment, including psychological violence, gender-based violence and harassment (violence and harassment directed against persons on the basis of their sex or disproportionately affecting persons of a particular sex, including sexual harassment), means any unacceptable behaviour or threat of such behaviour, whether it is intended to be physical, whether once or repeated, psychological, sexual or economic effects, whether the unacceptable conduct has or may have such effects, whether it violates the dignity of a

person or creates an intimidating, hostile, degrading or offensive environment, and/or whether it has caused or is likely to cause physical, material and/or non-material damage.

2. Violence is defined as the intentional infliction by act or omission of a person(s) on another person(s), whether physical, mental, sexual or economic, in connection with work, which causes or is likely to cause non-material or material damage to the worker.

3. Psychological violence is a form of violence, usually understood as the use of insults, unjustified remarks, threats, injunctions, intimidation, humiliation, abuse and other inappropriate behaviour to hurt, intimidate, belittle, embarrass, or render defenceless and helpless, to make the employee perceive a dependency to/perform a certain action/obey the perpetrator of the violence.

4. The most common forms of psychological violence at work are:

4.1. direct or indirect threats (e.g. dismissal, worsening of working conditions through scheduling, etc.);

4.2. underestimating performance (e.g. criticism of a staff member's performance on a task with the intention of humiliating or insulting them, etc.);

4.3. defamation (e.g. spreading information that is untrue and could harm a person's honour and dignity) Defamation is often intended to accuse another person of wrongdoing, etc.);

4.4. Repeated negative comments (e.g. unpleasant comments with different content, etc.);

4.5. Ignoring (e.g. isolation, exclusion from the team and shared activities, not sharing information, etc.);

4.6. manipulation (e.g. inadequate workload, manipulation of pay, unrealistic demands, etc.);

4.7. Unjustified criticism (e.g. destructive criticism of a staff member's performance of a task with the intent to humiliate, insult, etc.);

4.8. sarcasm (e.g. angry mockery, biting irony, etc.);

4.9. the desire to ridicule (e.g. behaviour by an employee or group of employees where the personal and professional characteristics of another person are used to ridicule the team, where snide remarks or associative jokes are made about the employee, and where a hostile and unethical environment is created in which the employee feels insulted, humiliated, etc.);

4.10. Screaming (e.g. talking in a raised tone, uncontrolled emotions, etc.);

4.11. insults intended to undermine a worker's self-confidence, including public humiliation;

4.12. the use of actions, statements or gestures that are directed at a worker's self-esteem and self-worth with the intent to humiliate.

5. Psychological violence can be verbal and/or non-verbal (through voice intonation, facial expressions, facial expressions, facial expressions, gestures, body language, etc.).

6. Violence can also occur through the use of information technology (emails), mobile phones (text messages, calls during holidays, out-of-work hours, etc.), public information or social platforms during work and non-work hours.

7. Misunderstandings/discussions/differences of opinion between employer and employee cannot in themselves be considered as psychological violence. The employer may check whether the employee is complying with the duties entrusted to him/her by the employment contract, require compliance with local regulations (arriving at work on time, not being allowed to leave the workplace without the permission of the line manager, etc.). While an employer's demanding behaviour towards an employee in general does not constitute psychological violence, unjustified demanding behaviour towards only one employee may constitute psychological violence.

8. Psychological violence in a company can be identified by several characteristics: repetition, duration, severity, abuse of power and deliberate behaviour, and is manifested through organisational measures, the isolation of the social worker or their team, harassment that invades a person's privacy, verbal aggression, intimidation, or even physical abuse and rumours about the person.

9. Harassment - unwanted conduct which, on the grounds of sex, race, nationality, citizenship, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnic origin, religion, is intended to offend or violate a person's dignity, and which is intended to create or does create an intimidating, hostile, degrading, humiliating or offensive environment

10. Harassment can be verbal and written, but less often physical. Harassment can include offensive comments, jokes, humiliation, withholding important information, isolating the person from colleagues, meetings or briefings, ignoring them, assigning them tasks that are not related to their work functions, etc.

11. Sexual harassment - unwanted abusive conduct of a sexual nature, whether verbal, written or physical, towards a person, intended to harm that person's dignity, in particular by creating an intimidating, hostile, degrading or offensive environment

Sexual harassment can take many forms and create an unwelcome, unpleasant, intimidating, humiliating or offensive working environment.

11. The main difference between violence and harassment is that harassment is a continuous process, i.e. repeated unacceptable behaviour, whereas violence is usually a one-off, sudden (acute) outbreak of abuse.

### CHAPTER III PREVENTING, IDENTIFYING AND MANAGING VIOLENCE AND HARASSMENT AT WORK

1. The Company does not tolerate harassment and violence and has the following preventive measures in place:

1.1 The Company's anti-violence and anti-harassment policy (culture) is developed, the main lines of action of which are:

1.1.1 the employer declares unequivocally that it does not tolerate violence and harassment in the workplace and that it applies psychological safety guarantees to all employees;

1.1.2 create a working environment in which the worker or group of workers is not subjected to hostile, unethical, degrading, humiliating, aggressive, abusive, insulting or offensive acts which violate the honour and dignity, physical or psychological integrity of an individual worker or group of workers, or are intended to intimidate, embarrass, or reduce the worker or group of workers to a defenceless and helpless position;

1.1.3 provide information to employees on the manifestations of psychological violence at work;

1.1.4 involve staff in the problem-solving process;

1.1.5 designate a person responsible for organising the prevention of violence and harassment in the working environment;

1.1.6 publicise information on support available for victims of violence and harassment.

1.2 assess the psychosocial risk factors of workers.

2. RESEARCH. The Company shall investigate all identified cases of violence and harassment, and the identified causes shall be addressed through specific actions, as appropriate, and through the joint efforts of the entire team.

3. ASSISTANCE TO THE VICTIM: The Company guarantees comprehensive assistance to employees who have suffered psychological violence (*in case of a need for psychological counselling, the employee may contact the Company's psychologist, etc.*).

4. RESPONSIBILITIES Employees who behave in an unacceptable manner, who discriminate against other employees or third parties, and who otherwise violate the rules established by the Company, may be subject to disciplinary action (a warning for breach of employment obligations, including serious breach of employment obligations, suspension from work).

### CHAPTER IV RULES OF CONDUCT FOR STAFF

1. Relationships between the Company's employees shall be based on honesty, courtesy and community. Employees shall assist each other in their professional activities and share their experience and knowledge.

2. Every employee of the Company shall respect his/her colleagues and other persons and shall not discriminate against them on any grounds such as gender, age, social status, sexual orientation, etc.

3. Employees must act in good faith and avoid:

3.1 personal insults and degradation of dignity;

3.2 undermining the work of another worker;

3.3 spreading gossip, ridicule, slander and defamation of colleagues;

3.4 showing negative emotions.

4 The lead worker must:

- 4.1 interact politely with subordinates;
- 4.2 not tolerate insults or humiliation;
- 4.3 creating a working and friendly environment within the management team, preventing conflicts and addressing the causes of disagreements;
- 4.4 comment correctly on subordinates' mistakes and shortcomings;
- 4.5 try to distribute the work of the team evenly, so as to make effective use of the skills and qualifications of each subordinate;
- 4.6 not to publicly express his/her sympathy or antipathy towards subordinates and other employees of the Company;
- 4.7 encouraging and listening to subordinates' views on work issues;
- 4.8 to properly evaluate the performance of subordinates;
- 4.9 be demanding and fair to subordinates, always remembering to set an example through his behaviour and work.

5 Each employee takes responsibility for his or her own actions and tries to resolve any issues or disagreements in a constructive and timely manner.

6 Violence and harassment are prohibited:

- 6.1 in workplaces, including public and private places, where the worker is at the employer's disposal or performing duties under an employment contract;
- 6.2 during rest and meal breaks, or when using domestic, sanitary and hygiene facilities;
- 6.3 during work-related trips, travel, training, events or social activities;
- 6.4 work-related communication, including communication using information and electronic communication technologies;
- 6.5 on your way to or from work;

7 In each case, upon receipt of a report of an employee's actions/behaviour that does not comply with the principles of communication set out in this Policy, the legislation of the Republic of Lithuania, or other internal normative documents of the Company, the case shall be investigated within the Company, committees shall be established, if necessary, and the conclusions on the employee's actions/behaviour shall be submitted in writing to the Head of the Company.

## CHAPTER V PROCEDURES FOR REPORTING AND INVESTIGATING VIOLENCE

1. All employees who have experienced violence at work may contact the Company by completing the Reporting Violence or Harassment at Work form (Appendix 1 to this Policy).

2. Notifications shall be made in accordance with the Staff Action Scheme (Annex 2 to this Policy).

3. Whenever a report is received, the person responsible for organising the prevention of violence and harassment in the working environment shall be informed, who shall examine the content of the report and organise an investigation of the case.

4:

- 4.1 Working Council;
- 4.2 Trade union.

5. All persons involved in the investigation shall maintain confidentiality and, until the investigation is completed, shall not disclose information to any person involved in the investigation, except to governmental and law enforcement authorities upon their request.

6. If the problem of psychological violence cannot be resolved within the Company, the employee may contact:

- 6.1 to the State Labour Inspectorate of the Republic of Lithuania (hereinafter referred to as the "SLI") with a complaint for identification of the situation and possible application of measures against the employer;
- 6.2 to the Labour Disputes Commission with a claim for compensation for pecuniary or non-pecuniary damage due to emotional distress, inconvenience, psychological shocks, psychological pressure, etc.;
- 6.3 the General Prosecutor's Office of the Republic of Lithuania, in order to obtain the status of Rapporteur;

6.4 Courts of general jurisdiction (civil proceedings, and in more serious cases, criminal proceedings).

## CHAPTER VI FINAL PROVISIONS

1. All employees shall be made aware of this Policy by e-mail, by signature, and by registering their awareness in the Employee Registration Card for Employees who have been made aware of the "Policy on Prevention of Violence and Harassment" (Annex 3 of this Policy).

2. Employees are invited to make suggestions on the preventive measures to be applied or added to them.

3. The policy may also be reviewed in the light of reports or findings of violence and harassment, as well as in the event of changes in potential risks or the emergence of new ones, and at the request of the State Labour Inspectorate. The changes shall be communicated to all staff in addition.

### ANNEXES:

Annex 1 - Reporting psychological violence at work form;

Annex 2 - Flowchart of actions to be taken by staff in the event of psychological violence;

Annex 3 - Form of record of staff familiarised with the document;

Prepared by:  
Personnel Manager  
Rosita Laužadienė  
2022.11.07

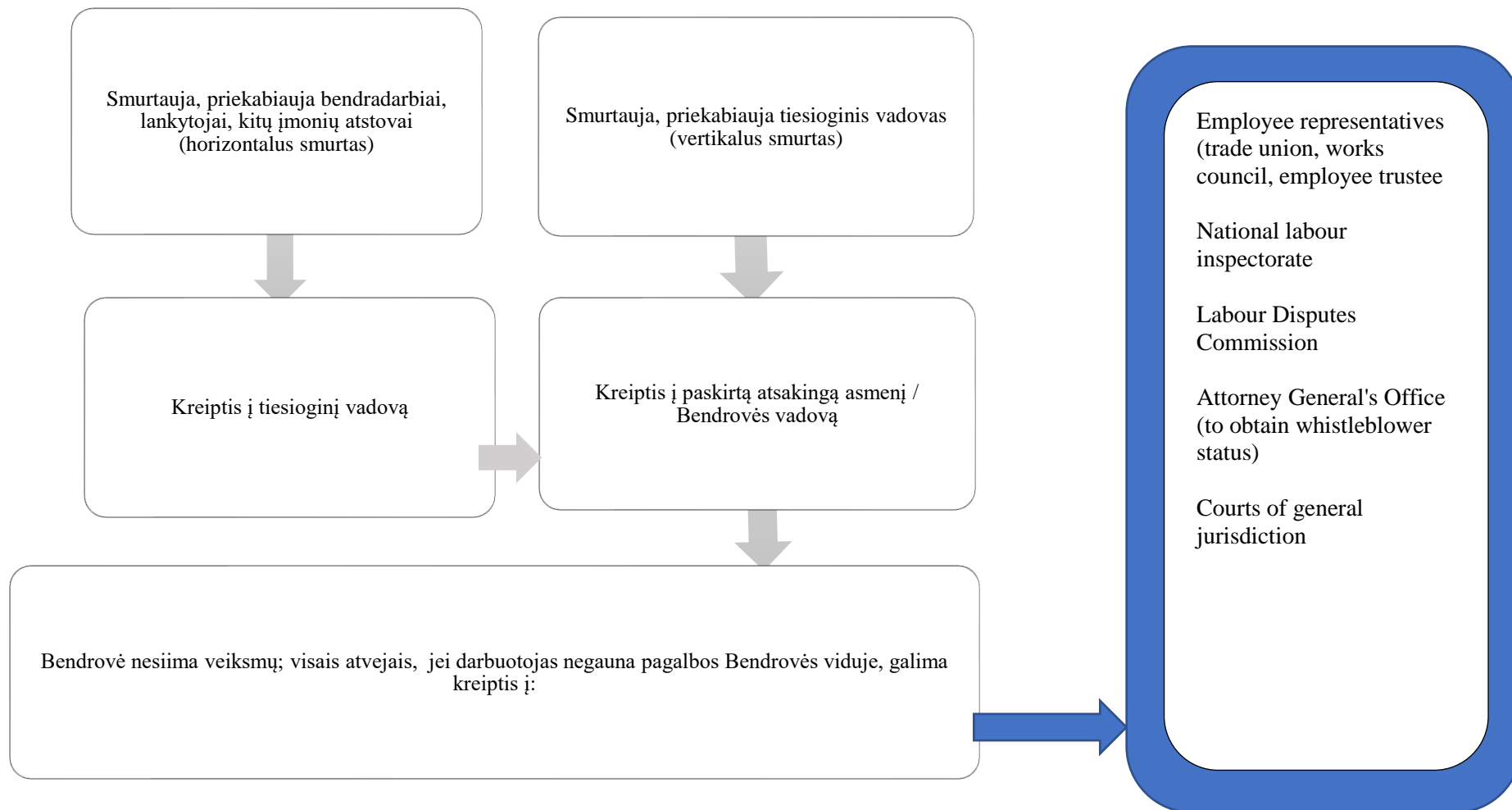
<b>REPORTING PSYCHOLOGICAL VIOLENCE AT WORK</b>	
<b>Details of the person submitting the notification</b>	
First name, Last name	
Responsibilities	
<i>Unit</i>	
<b>Contact details of the person submitting the notification</b>	
Telephone number	
Email address	
<b>Personal data of the suspect/perpetrator</b>	
First name, Last name	
Responsibilities	
Relationship with the person making the report ( <i>co-worker, line manager, Head of Company, etc.</i> )	
<b>Description of the event (date, time, place and circumstances)</b>	
Factual background	Implications
<b>Evidence (e.g. emails from the suspect, text messages, etc.)</b>	
Exhibit 1	
Exhibit 2	
<b>Witnesses</b>	
Name and contact details	
<b>Proposals by the notifier</b>	
Proposal for a solution to the conflict/existing situation	

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(date) (signature)

ANNEX 2

A FLOWCHART OF ACTIONS TO BE TAKEN BY STAFF IN THE EVENT OF VIOLENCE OR HARASSMENT



**AB „ ROKIŠKIO SŪRIS"**

**A RECORD OF THE STAFF WHO HAVE BEEN MADE AWARE OF THE DOCUMENT**

Name of unit:	
Date:	

The following employees of AB Rokiškio sūris have been familiarised with the Company's "Policy for the Prevention of Psychological Violence and Harassment in the Working Environment", approved by the Director's Order No.60 of 14 November 2022:

<b>Eil. No.</b>	<b>Name, surname</b>	<b>Responsibilities</b>	<b>Signature</b>
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Staff induction:

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(Duties )

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(First name, last name)

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(Signature)