
CNOOC International Limited
Procedural Aid
for
Respectful Workplace

*Conformance with this Procedural Aid is mandatory.
 You may not 'opt-out' of any requirement identified herein.*

Accountable Owner:	Manager, Talent Development HR Department	Responsible Author:	GM Total Rewards & HR Operations				
Publish Date:	4-Dec-19	Required Review Frequency:	3 years				
Effective Date:	1-Jun-18	Revision:	3.0				
Primary Regulation(s) Addressed by Document:	Not Applicable	Asset Life Cycle:	Explore	Develop	Produce	Market	Abandon
			√	√	√	√	√
Standard /Business Process Number & Activity # or Policy Statement #:	6.6	Applicability:	Global				

For document history, see the CNOOC International Management System (CIMS).

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Table of Contents

1.0 PURPOSE	5
2.0 SCOPE	5
3.0 OBLIGATIONS OF THE COMPANY, EMPLOYEES & CONTINGENT WORKERS	5
4.0 HARASSMENT	5
5.0 RESPONSE TO HARASSMENT	7
6.0 WORKPLACE VIOLENCE	7
7.0 RESPONSE TO WORKPLACE VIOLENCE	8
8.0 SITUATIONS BETWEEN PARTIES	8
9.0 DOMESTIC VIOLENCE	9
10.0 DIRECT THREAT	9
11.0 VIOLENT ONSITE INCIDENTS	10
12.0 POTENTIAL FOR A THREATENING SITUATION	10
13.0 REPORTING A COMPLAINT	11
13.1 Informal Approach.....	11
13.2 Formal Approach	11
14.0 INVESTIGATION PROCESS	12
15.0 COMPLAINT RESOLUTION	13
16.0 OTHER AVENUES OF RECOURSE	13
17.0 CONFIDENTIALITY	14

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1.0 Purpose

In support of the Company's commitment to maintain a work environment where all individuals are treated with dignity and respect, this Procedural Aid provides definitions for what constitutes Harassment and Workplace Violence. It outlines what process steps can and will be taken to address these behaviours should they occur. The Company complies with all location-specific laws and regulations concerning these issues. Individuals must be aware that some behaviours and acts are illegal, and therefore must be reported to the authorities.

2.0 Scope

This Procedural Aid applies to all Employees and Contingent Workers, both in the workplace and at other work-related events such as conferences, seminars, business trips and social events.

3.0 Obligations of the Company, Employees & Contingent Workers

The Company, including Supervisors and Managers, will ensure, as far as it is reasonably practicable to do so, that none of the Company's Employees or Contingent Workers are subjected to or participate in Harassment and Workplace Violence.

Employees and Contingent Workers will refrain from causing or participating in Harassment and Workplace Violence.

4.0 Harassment

Conduct involving Harassment for any reason is unacceptable and will not be permitted or condoned. Further, certain forms of Harassment including sexual Harassment are illegal. For the purpose of this Procedural Aid, Harassment includes Bullying. All individuals must take responsibility to ensure that such conduct does not occur.

Harassment is defined as any single incident or repeated incidents of objectionable or unwelcome conduct, comment, Bullying or action by a Person that the Person knows or ought reasonably to know will or would cause offence or humiliation. Harassment includes: (i) conduct, comment, Bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and (ii) a sexual solicitation or advance ("**Harassment**").

For example, Harassment may include conduct involving unwelcome advances, derogatory racial comments or jokes, or verbal or physical conduct of a sexual nature when:

- such conduct might reasonably be expected to cause insecurity, discomfort, offence or humiliation to another Person or group;
- submission to such conduct is made either explicitly or implicitly a condition of employment or is used as a basis of any employment decision;
- such conduct interferes with a Person's work performance or creates an intimidating, hostile or offensive work environment;
- such conduct constitutes a threat to the health or safety of the Person.

Bullying means offensive, intimidating, malicious or insulting behaviour, and includes an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient (“**Bullying**”).

All individuals are responsible for ensuring that the workplace is free from Harassment. Extreme cases of Harassment are usually obvious, but they may also occur in less obvious circumstances.

Additional examples of what constitutes Harassment include:

- spreading malicious rumours or insulting someone (particularly on the grounds of gender, race or disability);
- exclusion or victimization;
- ridiculing or demeaning someone – picking on them or setting them up to fail;
- overbearing supervision or other misuse of power or position;
- making unwelcome sexual advances – such as standing too close, displaying offensive materials, suggestive remarks, sexual jokes or compromising invitations, demands for sexual favours, and leering/whistling.

These are examples and may not cover all circumstances. Individuals should exercise their own judgement if they feel that they are being harassed or bullied and are encouraged to seek guidance from Human Resources. When determining if Harassment has taken place, the focus, in any particular case, will consider whether the behaviour is unwelcome or unwanted by the Person to whom the conduct is directed.

Harassment is considered a serious offence and may result in a number of Corrective Action measures, including termination of employment. Harassment can exist even where there is no intention to harass or offend. Every Person must take care to ensure their conduct is not offensive to others.

Harassment is not day-to-day management or Supervisor/Manager decisions involving work assignments, job assessment and evaluation, workplace inspections, implementation of appropriate dress codes, legitimate, constructive and fair criticism of an individual’s performance or behaviour at work, Corrective Action and the occasional raised voice or argument. However, Supervisor/Manager decisions must be carried out in a manner that is reasonable and not abusive.

Whether or not conduct amounts to Harassment is a subjective assessment from the point of view of the individual who believes they have been harassed. While the Company does not wish to provide an example of conduct which would not amount to Harassment (as each situation will fall to be determined on its own facts), the following sorts of conduct may be considered appropriate:

- physical contact necessary for the performance of work using accepted industry standards;
- conduct which all parties expressly agree is inoffensive or welcome;
- conflict or disagreements in the workplace that are not based on one of the prohibited grounds and which do not result in violence or which demean, humiliate, embarrass or intimidate another individual;
- workplace banter if everyone involved expressly agrees and no one involved is demeaned, humiliated, embarrassed or intimidated.

5.0 Response to Harassment

Supervisors/Managers must act promptly and appropriately if they suspect Harassment is taking place. Appropriate action can include:

- speaking privately to the individual who is potentially being harassed to find out if they have experienced unwelcome behaviour;
- speaking privately to the Person whose conduct may be harassing to indicate that their conduct is potentially offensive;
- directing individuals to remove offensive material or displays that are in contravention of the applicable legislation or this Procedural Aid;
- bringing serious concerns to the attention of senior management;
- holding an awareness session on Harassment and Workplace Violence;
- assessing the existing work environment to determine if there are any specific individuals who may be at greater Risk of being victims of threats or violence than others. For example, a land Person who may be dealing with a possible hostile landowner or a receptionist that is not in a secured area and therefore may be exposed to an unpredictable public. Specific Procedures should be developed for these situations in order to minimize Risk.

Supervisors/Managers who neglect to follow up on a complaint of sexual or other forms of Harassment may be liable under legislation for failing to take prompt and appropriate action.

6.0 Workplace Violence

The Company strictly prohibits Workplace Violence. Violations may lead to Corrective Action up to and including termination of employment and involvement of law enforcement authorities where appropriate. In the interest of reducing the threat of potential violence, possession of a weapon in the workplace (including all Company offices and work sites) will be considered Workplace Violence.

Workplace Violence is the threatened, attempted, or actual conduct of a Person that causes or is likely to cause physical or psychological injury or harm, whether work-related or at a work site. Workplace Violence includes domestic or sexual violence (“**Workplace Violence**”). Examples of Workplace Violence include but are not limited to:

- threatening behaviour such as shaking fists, destroying property or throwing objects;
- verbal or written threats that express an intent to inflict harm;
- physical attacks such as hitting, shoving, pushing or kicking;
- any other act that would arouse fear in a reasonable Person in the circumstances.

Individuals will promptly inform their Supervisor/Manager or Security of any threats or acts of violence which they have witnessed, received, or have been told that another Person has witnessed or received, including those related to domestic violence. It is the responsibility of any individual who becomes aware of an incident of violence not to report details of the incident to a third party without the prior consultation with the alleged victim.

The Supervisor/Manager or Security will in turn report the information to Human Resources. In the event that a Supervisor/Manager is unavailable or the Supervisor/Manager is the Person issuing or exhibiting the violent behaviour, the individual is expected to report the behaviour to Human Resources.

Any Person who makes a threat, exhibits threatening behaviour, or engages in a violent act on Company premises will be removed from the property as quickly as possible taking into consideration the safety and legal aspects of the situation.

Any Person who is engaging in Workplace Violence may be suspended from entering all Company premises pending the outcome of an investigation into the incident.

People who commit these acts outside the workplace but the results of which impact the workplace are also in violation and will be dealt with appropriately. An example would be at a work-sponsored social event or conference.

When threatening behaviour is exhibited or acts of violence are committed, the Company will initiate action under this Procedural Aid and in conjunction with Corporate Security and an Investigation Committee.

7.0 Response to Workplace Violence

Management, in conjunction with Human Resources and Corporate Security, is responsible for developing Workplace Violence procedures for their specific location, including the confirmation of appropriate people to contact.

In the event of a threat or act of workplace violence, Corporate Security is responsible for providing guidance and assistance in securing an area, ensuring the safety and security of Persons involved, participating in an investigation with the Investigation Committee, and, where required and appropriate, contacting and briefing the authorities.

A Supervisor/Manager or Corporate Security will consult with the alleged victim prior to reporting details of the incident to a third party including Human Resources. Once permission is obtained from the victim the incident should be reported to Human Resources.

8.0 Situations Between Parties

Violence between individuals can occur and sometimes individuals observe behaviour in another party that concerns them but fail to report it. This prevents the other party from getting the assistance they require and can allow the situation to escalate. The following are examples of behaviour that may cause concern:

- statements about aggressive action or repeated references to other incidents involving Workplace Violence or violent events;
- sudden insubordination, defiant behaviour or disregard for procedures;
- recent deterioration in work performance;
- inappropriate interest in the activities of another individual or Supervisor/Manager;
- significant overreaction to criticism;
- sudden deterioration in personal appearance;
- statements about being the target of a conspiracy;

- substance abuse;
- repeated references to guns, power, control or a recent weapon acquisition;
- statements about serious problems involving family, financial or personal matters.

Individuals are encouraged to contact their Supervisor/Manager, local Security (if available), Corporate Security and/or police immediately if they become concerned that someone is considering some violent action.

9.0 Domestic Violence

Domestic violence can endanger individuals and others. Although a restraining order or other protective order cannot guarantee protection, obtaining and enforcing one assists local Security, Corporate Security and the police in taking action if a violation occurs.

Individuals are encouraged to:

- notify their Supervisor/Manager and/or Corporate Security of serious personal issues that may have a negative impact on them at work;
- give a copy of any protective order to Corporate Security if they plan to enforce the existing protective order that identifies their work location;
- notify the phone company if they are receiving unusual, harassing or threatening phone calls at home and notify their Supervisor/Manager and/or Corporate Security if they receive calls of this nature at work.

10.0 Direct Threat

If an individual receives a direct threat they should:

- try to remain calm if a threat is received during a telephone conversation or meeting;
- explain to the Person that threats are not tolerated and are taken very seriously by the Company;
- tell the Person that comments such as these are not tolerated even if the Person says their statement was not serious;
- immediately, after the conversation ends, document the call detailing the threat and the response;
- advise their Supervisor/Manager of the incident.

If the individual perceives that the threat is serious, or the Person refuses to clarify their intentions, the individual should not discuss the situation further but do the following:

If on the phone the individual should:

- terminate the call immediately; and
- report the incident to their Supervisor/Manager and notify local Security, Corporate Security and/or the police.

If the threat is made in a face to face conversation or a meeting the individual should:

- leave the room immediately;
- get to a safe location; and

- report the incident to their Supervisor/Manager, local Security, Corporate Security and/or the police.

Supervisors/Managers should:

- subject to the protagonist's behaviour, and only if and when safe to do so, consider evacuating other personnel from the area to a safe location; and
- contact and await the arrival of local Security, Corporate Security and/or the police and provide details of the incident.

11.0 Violent Onsite Incidents

If an individual is the target of violence, they should try to remain calm and think rationally. Facing a serious threat in which there is no opportunity to escape, an individual should do what the assailant says if it will help protect the individual's safety.

Further guidelines for individuals are as follows:

- do try to escape if and when it can be done safely;
- do not try to confront the assailant unless that is the only option.

Other parties and/or Supervisor/Managers should:

- upon becoming aware of a violent incident on site, and if and when safe to do so, evacuate all personnel from the floor and building to a safe location;
- contact local Security, Corporate Security and/or the police; and
- await the arrival, in a safe location, of the security, including the police, and provide details of the incident.

12.0 Potential for a Threatening Situation

There may be situations where an individual may be required to meet with someone who has a history of abusive or threatening behaviour. If the individual has a possible concern for personal safety, the individual is encouraged to:

- advise their Supervisor/Manager, local Security or Corporate Security of the meeting with someone who may create a threatening situation;
- consider having the Supervisor/Manager attend the meeting or advising another party to stand-by for possible assistance if local Security or Corporate Security is not available; however, Security will make every effort to attend and be in the vicinity of the meeting location to provide immediate assistance if required;
- consider whether the Person will be accompanied by a Security escort or be allowed to leave the premises on their own, but with loose surveillance – subject to the Person's behaviour during the meeting;
- sit close to the door of the meeting location for a quick exit where there is potential for a threatening situation.

If there is a threat to personal safety, the individual is to:

- concentrate their efforts on getting out of the room and to a safe location, shouting for help as they leave the room if the individual becomes violent;

- contact the police and advise security if not already present; and
- document the incident and discuss with their Supervisor/Manager.

13.0 Reporting A Complaint

The following are recommended steps for reporting a complaint, however, individual situations or cases may require alternative approaches.

13.1 Informal Approach

Direct Discussion

Harassment may be unintentional, however, silence can be and often is, interpreted as acceptance. Wherever possible, individuals who believe that they have been the subject of Harassment or Workplace Violence should, in the first instance, explain to the Person whose conduct is of concern why the behaviour is unwelcome and ask them to stop the unwelcome behaviour. Often individuals may not be aware that their behaviour is bothersome and will change the behaviour once they realize this.

This informal stage will not generally result in any formal internal investigation or Corrective Action but is intended to enable parties to resolve the matter themselves without further escalation.

Informal Intervention

If the Complainant is unable or unwilling to deal with the Respondent directly, the Complainant may ask a Supervisor/Manager or Human Resources Business Partner (HRBP) for assistance to help write a letter or speak to the Respondent on their behalf. The Complainant may alternatively want another individual to be present to offer support when they approach the Respondent.

The role of Supervisors/Managers and HRBPs is to achieve an informal resolution wherever possible and to respect the confidentiality of all concerned.

If these attempts at an informal resolution fail, the Complainant may still file a formal complaint.

13.2 Formal Approach

The decision to progress to a formal complaint rests with the Complainant, however, the Complainant can have another Person help prepare their formal complaint and accompany them to any meetings.

If the Complainant wishes to make a formal complaint, it must be put in writing and submitted to their HRBP. The HRBP is responsible for the coordination and resolution of the complaint. The Complainant must be prepared to provide full information and it will be important to keep documentary evidence such as the dates of the alleged incidents, the nature of the behaviour, the names of any witnesses and any other information relevant to the investigation.

The Company may have a legal duty to intervene under certain circumstances.

Complaints will be managed in a timely and confidential manner with the investigation being conducted by an Investigation Committee, generally involving senior representatives from Human Resources and Legal. The thorough and impartial investigation will pay due regard to the rights of both the Complainant and the Respondent. Both the Complainant and the Respondent can be accompanied by a fellow Employee or another Person during investigations.

In the U.K., the Person accompanying the Complainant or the Respondent can be a fellow Employee or a Trade Union representative only.

When making a complaint, reporting parties have an obligation to act in an ethical manner. Frivolous or vexatious claims will not be tolerated. People making these types of accusations or claims could face Corrective Action.

14.0 Investigation Process

The following are recommended steps for the investigation process. Individual situations or cases may require an alternative approach.

1. The HRBP meets with the Complainant to discuss the allegation(s) and determine what course of action is appropriate. The best solution is to have the Complainant go back to the Respondent directly – but this may not be acceptable to the Complainant.
2. If the Complainant would like a formal investigation to proceed – they are asked to provide a written statement outlining the allegations. At this time they are advised that the Respondent will be provided the opportunity to read the written statement and will be given an opportunity to respond. The Complainant is also asked to provide names of witnesses (if any) in the written statement.
3. When the written statement is received from the Complainant, the HRBP will set up a meeting with the “Investigation Committee” who will appoint an investigator.
4. The investigator will meet with the Complainant to review the written statement to ensure there are no misunderstandings (e.g. ask clarifying questions). At this time, the names of witnesses are also confirmed and aligned with each corresponding allegation.
5. At the outset of the investigation, the investigator will separate the allegations into one of two classifications; the first classification is *"Harassment or Workplace Violence Allegation – worthy of investigation"*, and the second as *"Information Only – not Harassment or Workplace Violence by definition"*.
6. The investigator then meets with the Respondent to review the written statement; with particular focus on the allegations deemed “worthy of investigation”.
7. If the Respondent admits that the allegations are indeed correct, the investigation may end here. The investigator will request a written response from the Respondent even if they admit the allegations. If the Respondent does not agree, then the formal investigation will proceed and the Respondent will be asked to provide their side of the story (in writing) and will provide names of any witnesses they would like to be interviewed.
8. The investigator will conduct formal interviews with each of the witnesses identified by the Complainant and the Respondent. In some situations, the witnesses, the Complainant and/or the Respondent may be subject to follow-up interviews to reconcile and confirm relevant facts and information related to the complaint.
9. The allegations that were classified as *"Harassment or Workplace Violence Allegation – worthy of investigation"* are investigated and the findings are classified as either:

- **Not Substantiated** – evidence is inconclusive (e.g. one Person's word against the other); or
 - **No Harassment or Workplace Violence** – unsubstantiated (evidence shows that, by definition, Harassment or Workplace Violence did not occur); or
 - **Yes Harassment or Workplace Violence** – substantiated (evidence shows that, by definition, Harassment or Workplace Violence did occur).
10. When the investigation is complete, the investigator writes a report outlining the findings (with or without recommendations) and submits the report to the Investigation Committee for action.

15.0 Complaint Resolution

Upon completion of an investigation, the Investigation Committee will communicate its findings and intended actions to the Complainant and the Respondent. The following is a list of possible outcomes and intended actions.

Corrective Action Measures

- Harassment or Workplace Violence occurred; the Respondent will be subject to appropriate Corrective Action measures, up to and including referral to the Employee and Family Assistance Program (EFAP) or termination of employment.
- The outcome of the investigation and any Corrective Action measures undertaken will be recorded in the file of the Respondent.
- Consideration will be given to whether the Complainant and/or the Respondent should remain in their current positions or be transferred.
- Even where a complaint is not upheld (e.g. where evidence is inconclusive), consideration will be given to how the ongoing working relationship between the Complainant and the Respondent should be managed.

Unsubstantiated Claims

- If it is determined that no Harassment or Workplace Violence occurred, this finding will be communicated to the Complainant and the Respondent.
- All records of the complaint will be removed from the file of the Respondent.

Protection Against Retaliation

- There will be no retaliation against an individual who makes a good faith report.
- In most locations, it is against the law to retaliate against anyone who has made a complaint of Harassment or Workplace Violence in good faith or who has given reasonable evidence in support of or against a complaint.

16.0 Other Avenues of Recourse

This framework is not intended to discourage or prevent the Complainant from exercising any other legal rights pursuant to any other law. Individuals are entitled to lodge a complaint with the relevant government agency. Individuals who are considering such action are encouraged to seek guidance on a confidential basis from Human Resources. If the Human Rights Commission or other legal body becomes involved in a complaint or dispute, Human Resources and General Counsel must be contacted immediately. The

case may also be handed over to the appropriate law enforcement authorities. If law enforcement authorities become involved, Corporate Security or its designates may provide guidance as to the next steps of action.

17.0 Confidentiality

The Company understands the sensitivity of information requested in Harassment or Workplace Violence situations. In order to enable individuals to feel confident in raising these problems, this Procedural Aid stresses the importance of confidentiality. Only those people who need to know about the situation will be involved. It is the responsibility of anyone who is part of the procedure to respect the high level of confidentiality that is required. Breaches of confidentiality may result in a number of Corrective Action measures.

For the anonymous and confidential reporting of violations, individuals are encouraged to use the Integrity Helpline.