

BLUE LAGOON'S RESPONSE PLAN AGAINST SEXUAL HARASSMENT, GENDER-BASED HARASSMENT, BULLYING, AND ABUSE

POLICY

Sexual harassment, gender-based harassment, bullying and abuse (hereinafter termed violations) by the employees and managers of Blue Lagoon are prohibited and unconditionally banned in all aspects of the company's operations.

Blue Lagoon will not under any circumstance tolerate bullying, sexual harassment, gender-based harassment or abuse.

This applies to behaviour in any workplace context, including social events, tours organised by Blue Lagoon, training, conferences sponsored by the company and between work colleagues outside of work.

PURPOSE

The purpose of this policy is to ensure the right of all employees, as well as others working for or on behalf of Blue Lagoon, to work and perform their tasks in a healthy working environment.

The purpose is also to ensure that there are remedial measures in place for employees who believe that they have been subjected to violations.



DEFINITION:

Bullying

Repeated behaviour that is generally intended to cause distress to the individual concerned, by belittling, insulting, hurting or threatening them or causing them fear. Differences of opinion or disagreements arising from differing interests do not fall under this definition.

Sexual harassment

Any kind of unwanted sexual behaviour with the purpose or effect of violating the dignity of the individual concerned, particularly when such behaviour leads to intimidating, hostile, degrading, humiliating or offensive situations. Sexual harassment can be verbal, symbolic and/or physical in nature.

Gender-based harassment

Behaviour relating to the gender of the person subjected to such behaviour that is unwanted, has the purpose or effect of violating the dignity of the individual concerned and creates circumstances that are intimidating, hostile, degrading, humiliating or offensive to the person.

Abuse

Any form of behaviour which results in, or could result in, physical or psychological injury or suffering on the part of the victim; also the threat of such and coercion or arbitrary deprivation of freedom.

During the proceedings, the term "alleged victim" and "alleged perpetrator" should be used.

**THE BULLYING AND HARASSMENT TEAM
CONSISTS OF:**

Sigrún Halldórsdóttir (team leader)

Guðrún Lísa Sigurðardóttir

Ægir Viktorsson

BULLYING AND HARASSMENT TEAM

The Blue Lagoon has established a bullying and harassment team.

The team leader is the Director of Human Resources. The members of the team have knowledge and experience on issues related to human resources.

The role of the team is to examine and assess the cases that are directed to them, provide advice and investigate individual cases as warranted.

The team leader and other members of the team ensure complete confidentiality for all alleged parties, provide full support and comprehensively examine the nature and circumstances of the incident.

NOTIFICATIONS

Anyone who is affected by or witnesses bullying, sexual harassment or gender-based harassment or abuse should, if possible, inform the alleged perpetrator that the behavior is offensive, unacceptable and unwelcome, and must end immediately.

The person in question is strongly encouraged to send notification of violations to the team leader of the bullying and harassment team or alternatively, to other members of the team.

The person in question can also seek the assistance of his/her immediate superior or any other employee of Blue Lagoon that they trust. If any employee or manager employed by Blue Lagoon has reason to believe, or knowledge of, violations against another employee, the person in question should send notification of violations to the team leader of the bullying and harassment team or alternatively, to other members of the team.

RESPONSE PROCEDURE / ACTIONS

The harassment and bullying team accepts notifications of violations, investigates cases referred to the team, ensures equality and proportionality, and reaches a conclusion as soon as possible.

On receiving a notification, a member of the team will invite the person sending the notification to a meeting. If the notification has been submitted by a third party, a member of the team will invite the party believed to have suffered the abuse to a meeting and request his/her opinion of the notification.

As warranted, the team will request external advice/consultation from professionals who have in-depth knowledge and experience in the processing of such cases.

The actions taken during the processing of a case are done in consultation with the party that has suffered the violation according to the notification.