

DIGNITY AT WORK POLICY



European
Investment Bank | Group

DIGNITY AT WORK POLICY



**European
Investment Bank** | Group

European Investment Bank Group Dignity at Work Policy

© European Investment Bank, 2025

All rights reserved.

All questions on rights and licensing should be addressed to publications@eib.org.

European Investment Bank
98 -100, boulevard Konrad Adenauer
L-2950 Luxembourg

For further information on the EIB's activities, please consult our website, www.eib.org.
You can also contact our Info Desk, info@eib.org. Get our e-newsletter at www.eib.org/sign-up.

Published by the European Investment Bank.

Printed on FSC® Paper.

CONTENTS

- PREAMBLE v**

- TITLE I: GENERAL PRINCIPLES..... 1**
 - Article 1..... 1**
 - Purpose, scope and definitions 1
 - Article 2..... 2**
 - Conflict of interest 2
 - Article 3..... 3**
 - Duty to report..... 3
 - Article 4..... 3**
 - Protection against retaliation 3
 - Article 5..... 3**
 - Abusive use of the Dignity at Work procedure, false or malicious allegations 3
 - Article 6..... 4**
 - Confidentiality 4
 - Article 7..... 4**
 - Cooperation..... 4
 - Article 8..... 4**
 - Acts of obstruction..... 4
 - Article 9..... 5**
 - Data protection..... 5

- TITLE II: FORMAL AND INFORMAL CHANNELS 6**
 - Article 10 6**
 - Informal channels 6
 - Article 11 6**
 - The Dignity at Work procedure 6
 - Article 12 6**
 - Guiding principles of the Dignity at Work procedure 6
 - Article 13 7**
 - Initiation of a Dignity at Work procedure 7
 - Article 14 7**
 - Request for the initiation of a Dignity at Work procedure by the alleged victim 7
 - Article 15 7**
 - Initiation of the Dignity at Work procedure ex-officio..... 7
 - Article 16 8**
 - Assessment of the complaint..... 8
 - Article 17 9**
 - Notification of the initiation of the Dignity at Work procedure 9
 - Article 18 9**
 - Interim precautionary measures 9
 - Article 19 9**
 - Investigation 9
 - Article 20 10**
 - Transmission of documents to the Dignity at Work Panel..... 10

Article 21	10
Legal qualification of the facts	10
Article 22	11
Appointment of the Dignity at Work Panel.....	11
Article 23	11
Finalisation of the Dignity at Work procedure	11
Article 24	12
Supervision by independent expert	12
Article 25	12
Reasonable legal costs	12
Article 26	13
Personal file.....	13
TITLE III: FINAL PROVISIONS	14
Article 27	14
Sanctions for breach.....	14
Article 28	14
Entry into force.....	14

PREAMBLE

The European Investment Bank (the “**EIB**”) and the European Investment Fund (the “**EIF**”) (hereinafter together referred to as the “**EIB Group**”),

Considering the EIB Staff Regulations I and EIB Staff Regulations II as well as the EIF Staff Regulations I and EIF Staff Regulations II (hereinafter together referred to as the “**Staff Regulations**”), in particular Article 1 and Articles 38 to 40,

Considering the EIB Group Staff Code of Conduct, the Code of Conduct of the Management Committee and the Code of Conduct for the Chief Executive and Deputy Chief Executive (together referred to as the “**Codes of Conduct**”),

Considering the EIB Group Whistleblowing Policy,

Considering the Procedures for the Conduct of Investigations by the Investigations Division of the Inspectorate General at the EIB Group (“**Investigation Procedures**”),

Considering the Procedures on the Coordination of Staff Misconduct Matters at the EIB Group,

After consultation of the respective EIB and EIF Colleges of Staff Representatives,

Whereas:

- (1) In line with the principles set out in the Codes of Conduct, the EIB Group aims to ensure a working environment in which staff is treated with dignity and respect and to promote a culture in which psychological and sexual harassment are considered unacceptable and are neither tolerated nor ignored.
- (2) The EIB Group is determined to take all necessary measures to prevent harassment in the workplace and to raise awareness among staff about its zero tolerance of harassment, to provide guidance on the relevant policy and procedures and to foster the creation of a harmonious working environment.
- (3) All persons working for the EIB Group have a role to play in contributing to a good working atmosphere and abstaining from any behaviour that might disrupt the establishment and maintenance of a work environment where everyone is treated with respect, dignity and courtesy. In addition, the EIB Group is responsible for the prevention and resolution of harassment, and shall ensure that a simple, accessible and effective procedure, as well as appropriate support mechanisms, are in place in order to safeguard the dignity of all persons working for the EIB Group.
- (4) Each person working for the EIB Group, at any level, and in particular at managerial level, shares a responsibility for building a work environment free of all forms of harassment and nurturing a speak-up culture at work.
- (5) Managers have a special responsibility to engage actively with their staff and promote an environment of confidence, to lead by example and foster Dignity at Work standards, to identify and help address swiftly work-related conflicts and misconduct in their area of responsibility and across the whole EIB Group.
- (6) The EIB Group offers several alternatives to the persons working for the EIB Group who feel they are the victim of harassment. These include informal channels, facilitated, where appropriate, by the Ombuds Office, the Human Resources Directorate/People Office, or other competent services and a formal procedure, governed by this policy, aimed at ascertaining the facts and adopting appropriate follow-up measures.
- (7) Prior to initiating a formal procedure, persons working for the EIB Group are encouraged to make use of the optional informal channels available within the EIB Group. Throughout this process, they may be accompanied by persons of their choice for support and guidance.
- (8) The EIB Group commits to effectively addressing all forms of harassment by one or several individuals

and to taking appropriate action against any person working for the EIB Group who is found to have engaged in psychological or sexual harassment.

- (9) Drawing on the experience accumulated over the years in managing cases of alleged harassment, and in consideration of relevant developments in the case-law of the Court of Justice of the European Union and best practices, it is appropriate to review and replace the existing EIB Group Dignity at Work Policy adopted on 8 May 2019. This review forms an integral part of the Speak Up and Dignity at Work Action Plan launched in 2024 by the EIB Group and is intended to enhance the quality and efficiency of the Dignity at Work procedure, while promoting transparency, procedural clarity and trust in the internal framework.
- (10) The revised policy introduces substantive amendments designed to streamline the Dignity at Work procedure, by simplifying it, eliminating unnecessary steps and improving efficiency and speed, while also enhancing the quality of the output. In particular, it establishes a hybrid procedure combining a fact-finding investigation, conducted by the Investigations Division of the Inspectorate General with an independent legal assessment carried out by an external panel of experts, ensuring both methodological rigour and impartiality. The updated framework also streamlines the procedure by removing non-essential steps, that previously contributed to lengthy timelines. Furthermore, the revised policy facilitates a more timely adoption of precautionary measures to protect all parties and introduces clear procedural timelines, with cases generally expected to be resolved within 12 months, except in particularly complex cases or exceptional circumstances.

Have adopted the following Dignity at Work Policy:

TITLE I: GENERAL PRINCIPLES

Article 1

Purpose, scope and definitions

1.1 The purpose of the EIB Group Dignity at Work Policy (hereinafter the “**policy**”) is to establish the formal procedure for dealing with all forms of harassment in the workplace (hereinafter “**harassment**”).

1.2 Harassment may consist of psychological harassment or sexual harassment.

a) **Psychological harassment** means any improper and unwanted conduct that takes place over a period of time, is repetitive or systematic and involves physical behaviour, spoken or written language, gestures or other intentional acts that may undermine the personality, dignity or physical or psychological integrity of any person.

b) **Sexual harassment** consists of any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual blackmail is a particularly serious form of sexual harassment consisting of any situation in which individuals are explicitly or implicitly intimidated or threatened, with a view to obtaining sexual favours, by someone in a position of authority in the workplace or by someone with influence over their recruitment, professional status or career development. Sexual blackmail could also manifest itself through a situation presented as causing professional advantages or disadvantages for the victim, depending on whether s/he accepts or rejects it.

A behaviour may qualify as harassment under the policy even if it was not deliberately intended to cause harm. It is sufficient that such behaviour was not accidental and objectively led to violating the dignity of the persons who consider that they have been subject to harassment.

1.3 In the Policy:

a) **Alleged victim** means a person working for the EIB Group, as defined below, who considers that they have been or still are subject to harassment by another person working for the EIB Group;

b) **Accused person** means a person working for the EIB Group as defined below, who is accused of harassment by an alleged victim;

c) **Dignity at Work Panel** means an independent and external panel composed of three members, responsible for qualifying the facts established by the Investigations Division of the Inspectorate General;

d) **Whistleblower** has the meaning defined in the EIB Group Whistleblowing Policy;

e) **Witness** means a person who either personally and directly sees or hears an event or fact that may constitute an instance of harassment in the context of the policy, or has become aware of an event or fact that may constitute an instance of harassment in the context of the policy, or is able to give relevant information on the background of the alleged harassment.

1.4 The policy applies to the following persons (herein the “**Person(s) working for the EIB Group**”):

a) members of the EIB Management Committee as well as to the Chief Executive and Deputy Chief Executive of the EIF;

b) persons whose relations with the EIB Group are governed by individual contracts under Article 14 of the Staff Regulations, regardless of their place of assignment;

- c) persons working for the EIB Group on secondment from their parent administration;
- d) persons working for the EIB Group under the traineeship programme;
- e) persons working for the EIB Group as students on summer jobs;
- f) persons hired by the EIB Group to work in an external office and employed under local legislation.

Persons not directly employed by the EIB Group, such as interim staff, consultants and other service providers, shall be covered by the policy only as alleged victim. Should a person not directly employed by the EIB Group be accused of harassment, the EIB Group shall follow-up and take all appropriate measures under the applicable contractual framework.

The Dignity at Work procedure as defined in this policy, shall also apply to persons who worked for the EIB Group and left service with regard to acts alleged to have occurred during their employment with the EIB Group or, after their employment, in relation to a professional activity performed for the EIB Group.

- 1.5 This policy does not exclude conduct occurring outside the workplace, including during teleworking, commuting, business travel or work-related social events, regardless of whether it takes place during or outside working hours.
- 1.6 Any complaint about any kind of behaviour that qualifies as harassment under the policy shall be dealt with under the policy. This is without prejudice to the right of the alleged victim to make use of the informal channels available at the EIB Group prior to initiating the Dignity at Work procedure, and to possible infringements of other internal rules and regulations.
- 1.7 Once the Dignity at Work procedure has been concluded, no further investigation shall be initiated or resumed regarding the same facts under any other internal policy to determine whether they constitute harassment. However, should new elements or facts emerge, a new investigation may be opened.
- 1.8 Article 1.7 is without prejudice to:
 - a) the initiation or continuation of an investigation or inquiry into the same facts under any other internal rules and policies by the competent services, where the behaviour in question does not constitute harassment, but may otherwise constitute a breach of professional duties; and
 - b) the powers of the Disciplinary Committee to conduct disciplinary proceedings in accordance with its mandate, pursuant to Annex XI to the Staff Rules.

Article 2 Conflict of interest

- 2.1 Any person working for the EIB Group who becomes involved in the Dignity at Work procedure under the Policy and who finds themselves in a situation of conflict of interest, as defined by the EIB Group Staff Conflicts of Interest Policy and its implementing rules, shall immediately declare it to the Investigations Division of the Inspectorate General or to the EIB Director General of Human Resources /EIF Chief People Officer, who shall take the appropriate measures. In case of doubt, the EIB Group Chief Compliance Officer/EIF Chief Compliance Officer shall be consulted on the appropriate measures to mitigate the identified conflict of interest. Any conflict of interest that has not been proactively declared by the conflicted person pursuant to Article 2.1, shall be assessed in line with the EIB Group Staff Conflicts of Interest Policy and its implementing rules by the EIB Group Chief Compliance Officer/EIF Chief Compliance Officer. In case of a conflict of interest of the EIB Group Chief Compliance Officer/EIF Chief Compliance Officer, the matter shall be referred to the EIB President/EIF Chief Executive.
- 2.3 In case of a conflict of interest of the Investigations Division of the Inspectorate General or the EIB Director General of Human Resources /EIF Chief People Officer, the matter shall be referred to the EIB President/EIF Chief Executive, who will assign the case to another service. For the purposes of this

policy, where a matter is referred to another service by the EIB President/EIF Chief Executive, all references to the Investigations Division of the Inspectorate General and/or EIB Director General of Human Resources/EIF Chief People Officer shall be understood as referring to that designated service.

- 2.4 All powers and responsibilities assigned under the policy to the EIB Director General of Human Resources/EIF Chief People Officer shall be exercised by the EIB Director General/EIF Head of the Service designated by the EIB President/EIF Chief Executive. All the provisions of the policy shall be applied *mutatis mutandis*.

Article 3

Duty to report

- 3.1 Pursuant to the Codes of Conduct, any person working for the EIB Group, and particularly those holding managerial positions, who becomes aware of behaviour or facts that manifestly qualify as harassment under the policy, has a duty to report it.

Article 4

Protection against retaliation

- 4.1 Protection against any acts of retaliation provided for by the EIB Group Whistleblowing policy shall be granted to any person involved in the Dignity at Work procedure under the policy in any capacity, including witnesses and representatives of the parties.

Article 5

Abusive use of the Dignity at Work procedure, false or malicious allegations

- 5.1 Abusive use of the Dignity at Work procedure refers to any false, malicious or vexatious use for purposes other than those envisaged by said procedure.
- 5.2 False, malicious or vexatious allegations refer to allegations that an impartial and reasonable observer placed in the same circumstances would have good reason to regard as false or deceitful or that are knowingly or deliberately inaccurate or misleading, including but not limited to, those which are made exclusively with the purpose of either gaining some form of advantage or causing harm to a person or to the EIB Group.
- 5.3 Where there are indications that the Dignity at Work procedure is being abused or that the allegations are false, malicious or vexatious, the Investigations Division of the Inspectorate General shall inform the person concerned and, in accordance with the Investigation Procedures, initiate a separate investigation into the matter. This separate investigation shall proceed independently and run its course separately from the ongoing Dignity at Work procedure. The Investigations Division of the Inspectorate General shall, in any case, transmit the investigation report referred to in Article 19 to the EIB Director General of Human Resources/EIF Chief People Officer, so that the Dignity at Work procedure may run its course.
- 5.4 Abusive use of the Dignity at Work procedure and/or false, malicious or vexatious allegations by the alleged victim, the accused person, a whistleblower or any other person involved in the Dignity at Work procedure, constitute a breach of professional obligations and shall lead to the initiation of disciplinary proceedings.

Article 6 Confidentiality

- 6.1 Any person working for the EIB Group who, in any manner whatsoever, becomes aware of or involved in the Dignity at Work procedure under the policy, is obliged to observe the strictest confidentiality regarding all aspects of said procedure, including the fact of its existence, the persons involved and the grounds on which the procedure was initiated and its outcome.
- 6.2 The obligation of confidentiality shall not apply to the alleged victim and the accused person with regard to the existence of the Dignity at Work procedure, which they may disclose to their own managers. Upon conclusion of the Dignity at Work procedure, the alleged victim and the accused person may disclose the outcome of the procedure, subject to the following conditions:
- a) If the procedure concludes without a finding of harassment, disclosure of the outcome may be made immediately.
 - b) If the procedure concludes with a finding of harassment, disclosure of the outcome shall be permitted only after the conclusion of any subsequent disciplinary proceedings.
- 6.3 The confidentiality requirement shall not prejudice the rights of defence of the alleged victim and the accused person. In particular, the confidentiality requirement does not apply to the relations between the alleged victim and the accused person and the witnesses or potential witnesses, their legal counsel or representatives, if any.
- 6.4 Any breach of confidentiality may lead to the initiation of disciplinary proceedings.

Article 7 Cooperation

- 7.1 Any person working for the EIB Group who becomes involved in the Dignity at Work procedure under the policy has the duty to cooperate fully and in good faith to ensure the smooth running of the procedure. Any such person shall also communicate to the competent service, without concealment or alteration and to the best of their knowledge, all information available to them.

Article 8 Acts of obstruction

- 8.1 Deliberate acts of obstruction of the Dignity at Work procedure, including by knowingly making false statements and allegations or by any attempt to hinder or impede the investigation by any person working for the EIB Group, amount to misconduct and may lead to the initiation of disciplinary proceedings.
- 8.2 Disciplinary proceedings may be initiated against a staff member who proffers threats, acts in a hostile manner or retaliates in the course of the Dignity at Work procedure.

Article 9

Data protection

- 9.1 The EIB Group and all persons involved in the Dignity at Work procedure must comply with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data. Any restrictions of the data protection rights shall be based on the internal rules adopted in accordance with Article 25 of Regulation 2018/1725¹ (hereinafter the “**internal rules**”).
- 9.2 Within the scope of the policy, the EIB Director General of Human Resources/EIF Chief People Officer shall act as the ‘controller’ within the meaning of Article 3(8) of Regulation 2018/1725. The Investigations Division of the Inspectorate General will act as ‘processor’ within the meaning of Article-3(12) of Regulation 2018/1725.
- 9.3 All data collected and exchanged in the course of the Dignity at Work procedure shall be adequate, kept secured and confidential, processed only for the purposes related to the implementation of the policy, not transferred to unauthorised third parties and not kept for longer than necessary.
- 9.4 An exception to the confidentiality of data shall apply when this is necessary for the prevention, investigation, detection and/or prosecution of criminal offences by the national competent authorities. In this case, the EIB Director General of Human Resources/EIF Chief People Officer shall inform the alleged victim, the accused person, witnesses or other persons involved of the possible transmission of data to the competent national authorities beforehand unless informing them may risk undermining the prevention, investigation, detection and/or prosecution of criminal offences. In this case, they shall be informed at a later stage, in accordance with the restrictions laid down in the internal rules.
- 9.5 The alleged victim’s and/or the accused person’s and/or the witnesses’ right to access data related to them may be temporarily restricted, in accordance with the restrictions laid down in the internal rules, for as long as this is necessary to protect other persons involved in the Dignity at Work procedure or to safeguard the effectiveness of the procedure. This restriction shall be duly balanced with the protection of the procedural rights of parties involved and witnesses, in particular the right of parties involved to due process, the rights of defence and the presumption of innocence.
- 9.6 The data transmitted during the Dignity at Work procedure to the involved parties shall only be the data that are relevant and necessary for the exercise of their procedural rights. The parties may object to the transmission of data on compelling legitimate grounds except in those cases provided for in Article 5 (b), (c) and (d) of Regulation 2018/1725.
- 9.7 Any unjustified breach of these provisions shall be brought to the attention of the EIB/EIF Data Protection Officer.

¹ OJ L, 2023/2717

TITLE II: FORMAL AND INFORMAL CHANNELS

Article 10

Informal channels

- 10.1 Before requesting the initiation of the Dignity at Work procedure, alleged victims are encouraged to make use of any optional informal channels within the EIB Group. These may include, as appropriate, the intervention of their line manager(s), the involvement of the EIB Human Resources Directorate/EIF People Office, the mediation services under the supervision of the Ombuds Office, or any other informal channels established under the authority of the Ombuds Office.
- 10.2 Likewise, alleged victims and accused persons may try to solve their concerns informally and bilaterally. To the extent possible, they may address their concerns in an open, honest, non-contentious and non-threatening manner. In doing so, the alleged victims and accused persons may seek the assistance of any person of their choice. No record of the outcome of these discussions shall be kept unless the parties so wish. Should that be the case, such record may be voluntarily communicated to the relevant services in case a Dignity at Work procedure is subsequently initiated.
- 10.3 The use of the informal channels referred to in Articles 10.1 and 10.2 is voluntary. Alleged victims may request the initiation of the Dignity at Work procedure at any time, without the need to have previously resorted to any informal channel or fulfilled any other formalities.
- 10.4 Any informal channel resorted to by either the alleged victims or the accused persons shall be considered closed once a Dignity at Work procedure involving the same parties is initiated.

Article 11

The Dignity at Work procedure

- 11.1 The Dignity at Work procedure shall comprise the following phases:
 - an investigation conducted by the Investigations Division of the Inspectorate General, in accordance with the Investigation Procedures, to establish the facts reported by the alleged victim, EIB/EIF services, or third parties; and
 - the legal qualification of the facts established by the Investigations Division of the Inspectorate General, carried out by the Dignity at Work Panel.
- 11.2 The Dignity at Work procedure shall be concluded in accordance with Article 23.

Article 12

Guiding principles of the Dignity at Work procedure

- 12.1 The Dignity at Work procedure shall be governed by the following principles:
 - a) adherence to the principles of impartiality, independence, integrity and objectivity;
 - b) respect for the presumption of innocence of the accused person;
 - c) consideration of both incriminating and exculpatory evidence; and
 - d) strict confidentiality regarding all the elements of the Dignity at Work procedure, during and after its conclusion, without prejudice to Article 6.2.

Article 13

Initiation of a Dignity at Work procedure

- 13.1 The initiation of a Dignity at Work procedure may be requested by the alleged victim or triggered by reports from the EIB/EIF services or third parties.
- 13.2 The request to initiate a Dignity at Work procedure shall be submitted within a reasonable period of time, taking into consideration the particular circumstances of the case, and in any case no later than five years from the last act considered by the alleged victim to be an act of harassment.
- 13.3 The request to initiate a Dignity at Work procedure may be withdrawn at any time. Where the Dignity at Work procedure has been triggered by reports from the EIB/EIF services or third parties, the alleged victim may request its discontinuation. However, once a request has been submitted or the Dignity at Work procedure has been initiated, the procedure may continue if the EIB Group has a legitimate interest in pursuing it. The decision to continue the procedure shall be adopted by the EIB Director General of Human Resources/EIF Chief People Officer, after consulting the Inspector General and, if appropriate, the Office of the Group Chief Compliance Officer.

Article 14

Request for the initiation of a Dignity at Work procedure by the alleged victim

- 14.1 The alleged victim wishing to initiate a Dignity at Work procedure shall lodge a complaint. The complaint should not exceed 50 pages (without annexes) and shall specify:
 - a) the name and position of the alleged victim and of the accused person;
 - b) the factual background of the alleged harassment, namely the relevant events, situations and/or incidents, including, to the best of their knowledge, their dates, places, reactions and effects;
 - c) if applicable, the documented outcome of the recourse to informal channels;
 - d) if applicable, the proposal to hear witnesses in support of the complaint, indicating in a separate document, marked as "confidential," their names and a brief explanation on why those persons can help establish the facts; and
 - e) any relevant supporting document or evidence.
- 14.2 In case the complaint concerns several accused persons, the alleged victim shall lodge separate complaints, describing the factual background of the alleged harassment for each separate accused person. In such cases, the same Dignity at Work Panel will be appointed.
- 14.3 The complaint shall be considered to be duly filed once it has been received, including all the necessary elements referred to in Article 14.1, by the Investigations Division of the Inspectorate General. The Investigations Division of the Inspectorate General shall acknowledge receipt of the filed complaint.

Article 15

Initiation of the Dignity at Work procedure ex-officio

- 15.1 Where the EIB Director General of Human Resources/EIF Chief People Officer becomes aware of facts or behaviours that manifestly qualify as harassment, they shall refer the matter to the Investigations Division of the Inspectorate General, together with all the elements of proof at their disposal. This is without prejudice to the right of the alleged victim to request that the matter not be referred to the Investigations Division of the Inspectorate General.

Article 16

Assessment of the complaint

- 16.1 Following receipt of a complaint submitted by the alleged victim, or reports from the EIB/EIF services or third parties, the Investigations Division of the Inspectorate General shall conduct an assessment in accordance with the Investigation Procedures and may, as a result of the assessment:
- a) consider the complaint admissible and proceed with the initiation of the Dignity at Work procedure in accordance with Article 19;
 - b) dismiss the complaint if it is deemed inadmissible or manifestly unfounded; or
 - c) after having sought the consent of the alleged victim, refer the matter to the Ombuds Office, the EIB Human Resources Directorate/EIF People Office or any other appropriate service, where an informal approach is considered more suitable, provided that following internal consultation, it is confirmed that the matter has not previously been addressed through informal channels in relation to the same facts.
- 16.2 The complaint shall be dismissed as inadmissible or manifestly unfounded in the following cases:
- a) It has not been filed within the deadline referred to in Article 13.2.
 - b) It refers to persons who do not fall within the scope of the policy.
 - c) It constitutes a manifest abuse of procedure, is frivolous, false or vexatious, a finding that can trigger the initiation of disciplinary proceedings.
 - d) It does not contain *prima facie* evidence of harassment. *Prima facie* evidence means evidence of a fact that is of sufficient weight to justify a reasonable inference of its existence but does not amount to conclusive evidence of that fact.
 - e) Another formal procedure is considered more appropriate to deal with the issues raised in the complaint, in which case the decision declaring the complaint inadmissible will indicate the appropriate procedure.
 - f) The facts described in the complaint and the parties involved are the same as in previously introduced and assessed cases, either in a previous Dignity at Work procedure or by a competent court.
- 16.3 A decision to dismiss the complaint as inadmissible or as manifestly unfounded, or to refer the matter to the Ombuds Office, the EIB Human Resources Directorate/EIF People Office, or any other competent service, shall state the grounds on which it is based.
- 16.4 The decision of the Investigations Division of the Inspectorate General to consider the complaint admissible, as referred to in Article 16.1 a), shall, in principle, be rendered within 20 working days from the filing of the complaint, as referred to in Article 14.3.
- 16.5 The intention to dismiss the complaint as inadmissible or as manifestly unfounded, as referred to in Article 16.1 b), or to refer the matter to the Ombuds Office, the EIB Human Resources Directorate/EIF People Office, or any other competent service, as referred to in Article 16.1 c), shall, in principle, be notified to the alleged victim within 20 working days from the filing of the complaint, as referred to in Article 14.3. The alleged victim shall have 10 working days to submit his or her comments and observations on the intention to dismiss or refer the complaint prior to the adoption of the decision.

Article 17

Notification of the initiation of the Dignity at Work procedure

- 17.1 Upon completion of the assessment, the Investigations Division of the Inspectorate General shall promptly notify the EIB Director General of Human Resources /EIF Chief People Officer for the purposes of Article 18, stating the identity of the parties involved and a summary of the allegations.
- 17.2 The Investigations Division of the Inspectorate General shall notify the accused person of the initiation of a Dignity at Work procedure in accordance with the Investigation Procedures.

Article 18

Interim precautionary measures

- 18.1 The EIB Director General of Human Resources/EIF Chief People Officer shall adopt any interim precautionary measures that are considered justified, proportionate and necessary to protect the alleged victim, the accused person and/or the witnesses and/or other persons as appropriate and/or to ensure the smooth running of the service, either at the request of the person concerned, at their own initiative or following a recommendation of the Ombuds Office or the Investigations Division of the Inspectorate General.
- 18.2 With a view to putting an end to and/or preventing any further escalation of the alleged harassment and in compliance with the EIB Group duty of care, such measures may include, but are not limited to, the reassignment to another service of the alleged victim and/or of the accused person and/or the witnesses and/or other persons as appropriate, or a period of dispensation from duties with full remuneration.
- 18.3 Interim precautionary measures shall be adopted after hearing the person directly concerned by the envisaged precautionary measure unless overriding reasons linked to severity and seriousness of the situation justify otherwise. Interim precautionary measures may be adopted even if the person concerned is opposed to their adoption, provided that they are considered necessary for their effective protection or for the effective protection of others, or are in the interest of the service. Where it is not possible to hear the person concerned prior to the adoption of the precautionary measure, they shall be given the opportunity to submit comments and observations as soon as the circumstances permit.

Article 19

Investigation

- 19.1 The Investigations Division of the Inspectorate General shall, in accordance with the Investigation Procedures:
 - a) conduct an investigation in order to establish the facts relating to the alleged harassment as described in the complaint or reported by the EIB Group services or third parties.
 - b) issue an investigation report, in principle, within seven months from the date on which the complaint or reports submitted by the EIB Group services or third parties was received by the Investigations Division of the Inspectorate General. This time limit may be extended in exceptional circumstances.
- 19.2 The investigation report shall include a detailed description of the investigation findings into each allegation, and a summary of the facts and evidence supporting each finding.
- 19.3 The investigation report, along with the full investigation file, shall be transmitted to the EIB Director General of Human Resources/EIF Chief People Officer.

Article 20

Transmission of documents to the Dignity at Work Panel

- 20.1 Upon receiving the investigation report, the EIB Director General of Human Resources/EIF Chief People Officer shall transmit it, together with the complaint, if any, to the Dignity at Work Panel.

Article 21

Legal qualification of the facts

- 21.1 The Dignity at Work Panel shall be responsible for the legal qualification of the facts established by the Investigations Division of the Inspectorate General in the investigation report. It shall issue a reasoned recommendation (hereinafter the “**recommendation**”), concluding whether, taken individually and as a whole, these facts:
- a) constitute harassment; or
 - b) do not constitute harassment.
- 21.2 The Dignity at Work Panel shall not carry out a new investigation into the facts established by the Investigations Division of the Inspectorate General. It shall base its assessment on the findings set out in the investigation report. However, where necessary for the purpose of its determination, the Dignity at Work Panel may seek written clarifications from the Investigations Division of the Inspectorate General.
- 21.3 Without prejudice to Article 21.2, the Dignity at Work Panel may, at its sole discretion, hear the alleged victim and the accused person, if it deems it necessary to legally qualify the facts established by the Investigations Division of the Inspectorate General in the investigation report.
- 21.4 The panel shall communicate a draft of the recommendation, together with the investigation report, to both the alleged victim and the accused person, in principle, within 1 month from the date on which it receives the documents referred to in Article 20. Each party shall have 15 working days to submit their comments and observations on the document, which the panel will take into account when preparing its recommendation.
- 21.5 The Dignity at Work Panel shall, in principle, issue its recommendation and communicate it to the EIB Director General of Human Resources/EIF Chief People Officer within 3 months from the date on which it receives the documents referred to in Article 20. The recommendation shall be adopted by a majority of its members. In case of a disagreement, they shall proceed to a vote. The members of the Dignity at Work Panel are not allowed to abstain from voting. The EIB Director General of Human Resources/EIF Chief People Officer shall also communicate the recommendation of the Dignity at Work Panel to the Investigations Division of the Inspectorate General.
- 21.6 If the Dignity at Work Panel considers that the alleged victim has abused the Dignity at Work procedure and/or made false, vexatious or malicious allegations, the panel shall refer the matter to the Investigations Division of the Inspectorate General for appropriate action.
- 21.7 In the recommendation, the Dignity at Work Panel may identify any potential breach of professional duties, internal rules and policies, other than those stemming from this policy. It may recommend referring any such breach to the competent services for follow-up action.
- 21.8 The recommendation may also include a suggestion to the EIB Director General of Human Resources/EIF Chief People Officer regarding measures that they deem appropriate to address the situation.

Article 22

Appointment of the Dignity at Work Panel

- 22.1 The EIB Director General of Human Resources/EIF Chief People Officer shall appoint the members of the Dignity at Work Panel, taking into account, as far as reasonably possible, diversity criteria.
- 22.2 The Dignity at Work Panel shall consist of three members, appointed as follows:
- a) one member with legal background, who shall act as chairperson, appointed for a renewable term of two years; and
 - b) two members appointed on a case-by-case basis for each Dignity at Work procedure: one with legal background, who may be a former EIB/EIF staff member, and one specialised in psychiatry, psychology or occupational health.
- 22.3 The members shall be selected from a diverse list of persons to be established by the EIB/EIF, which shall contain up to 30 names agreed between the EIB/EIF and their respective College of Staff Representatives.
- 22.4 The panel members shall confirm the absence of any conflict of interest upon their appointment. They shall declare any potential conflicts of interest they may have (including regarding the alleged victim or the accused person) as soon as they arise. If a conflict of interest exists, the EIB Director General of Human Resources/EIF Chief People Officer shall immediately replace the conflicted member with another person from the list referred to in Article 22.3. The EIB Director General of Human Resources/EIF Chief People Officer shall consult the Office of the EIB Group Chief Compliance Officer/EIF Chief Compliance Officer, if necessary.
- 22.5 The EIB Director General of Human Resources/EIF Chief People Officer shall communicate the composition of the Dignity at Work Panel to the alleged victim and to the accused person, in principle, within five working days from the confirmation of the absence of any conflict of interest.
- 22.6 Each party may raise a reasoned objection in writing against the appointment of one or more panel members within five working days from the notification of its composition.
- 22.7 The EIB Director General of Human Resources/EIF Chief People Officer shall, in principle within ten working days from the receipt of the objection, decide whether to:
- a) accept the reasoned objection, in duly justified cases and replace the member(s) for whom an objection has been raised; or
 - b) reject the objection and provide a reasoned justification in this respect.
- The decision to reject the reasoned objection may not be further contested.
- 22.8 The Dignity at Work Panel shall be assisted by a secretariat responsible for providing administrative support. It shall not interfere with the independence of the Dignity at Work Panel.

Article 23

Finalisation of the Dignity at Work procedure

- 23.1 Upon finalisation of its works, the Dignity at Work Panel shall communicate its recommendation, together with the comments and observations submitted by the alleged victim and/or the accused person on the panel's draft recommendation, to the EIB Director General of Human Resources/EIF Chief People Officer.

- 23.2 If the EIB Director General of Human Resources/EIF Chief People Officer concludes, based on the investigation report issued by the Investigations Division of the Inspectorate General and the recommendation of the Dignity at Work Panel, that no harassment can be established, the EIB Director General of Human Resources/EIF Chief People Officer shall issue a decision to close the procedure without further action. The draft decision shall be notified to both the alleged victim and the accused person, in principle, within one month from the receipt of the documents referred to in Article 23.1. It shall also be notified to the Investigations Division of the Inspectorate General. Before the decision is adopted, the alleged victim shall have the opportunity to submit comments and observations on the draft decision within 15 working days from its receipt. The draft decision shall be notified together with the investigation report and the recommendation.
- 23.3 If the EIB Director General of Human Resources/EIF Chief People Officer concludes, based on the investigation report issued by the Investigations Division of the Inspectorate General and the recommendation of the Dignity at Work Panel, that harassment is established, disciplinary proceedings shall be initiated against the person concerned with a view to assessing whether one of the sanctions listed in Article 38 of the EIB/EIF Staff Regulations must be imposed. Before initiating such proceedings, and in accordance with Articles 1.1.1 and 1.1.2 of Annex XI to the EIB/EIF Staff Rules, the EIB Director General of Human Resources /EIF Chief People Officer shall notify the person concerned of the intention to do so and provide them with the opportunity to submit comments and observations. This notification shall, in principle, take place within one month from the receipt of the documents referred to in Article 23.1. Following such notification, the procedure set out in Annex XI to the Staff Rules shall apply. The EIB Director General of Human Resources/EIF Chief People Officer shall also notify the other party of the outcome of the Dignity at Work procedure within the same deadline. Additionally, the EIB Director General of Human Resources/EIF Chief People Officer shall communicate the outcome of the procedure to the Investigations Division of the Inspectorate General.
- 23.4 If the person found to have engaged in harassment is a person listed in Article 1.4(a), the procedure referred to in Article 23.b of the EIB Rules of Procedure or a procedure that would respect the principles outlined in Article 16.1 of the EIF Statutes shall be triggered, as applicable.

Article 24

Supervision by independent expert

- 24.1 In particularly sensitive cases, the Dignity at Work procedure, as defined in this policy, may be supervised by an external independent expert, and the investigation, pursuant to Article 19, may be outsourced by the Investigations Division of the Inspectorate General. The former shall be appointed by the EIB Director General of Human Resources/EIF Chief People Officer and the Inspector General, in collaboration with the Ethics and Compliance Committee when relevant.

Article 25

Reasonable legal costs

- 25.1 Upon completion of the Dignity at Work procedure, the EIB Group shall reimburse reasonable legal costs incurred by the alleged victim, except if disciplinary proceedings are initiated against him/her for abuse of the Dignity at Work procedure and/or for vexatious, false or malicious allegations.
- 25.2 Upon completion of the Dignity at Work procedure, the EIB Group shall reimburse reasonable legal costs incurred by the accused person provided that the procedure concludes with no finding of harassment.

Article 26
Personal file

- 26.1 A copy (paper and/or electronic) of the decision dismissing a complaint as inadmissible or as manifestly unfounded shall be placed in a special file within the personal file of the alleged victim marked as strictly confidential with strictly limited access. The alleged victim may request that the decision is not placed in, or be removed from, their personal file.
- 26.2 A copy (paper and/or electronic) of the decision referred to in Article 23 shall be placed in the personal file of the alleged victim and the accused person. However, where the Dignity at Work procedure concludes with a finding of harassment, no document shall be placed in the personal file of the persons concerned until the completion of any related disciplinary proceedings. Where the Dignity at Work procedure concludes with no finding of harassment, the accused person may request that the decision referred to in Article 23.2 not be placed in, or be removed from, their personal file.
- 26.3 The applicable retention periods shall apply.

TITLE III: FINAL PROVISIONS

Article 27

Sanctions for breach

27.1 Any serious breach of the provisions of the policy may lead to the initiation of disciplinary proceedings.

Article 28

Entry into force

28.1 The EIB Group Dignity at Work Policy adopted on 8 May 2019 is hereby repealed and replaced in full.

28.2 The present Dignity at Work Policy shall apply from 3 December 2025.

28.3 Any procedure initiated before 3 December 2025 shall continue to be governed by the EIB Group Dignity at Work Policy adopted on 8 May 2019 until its conclusion in accordance with Article 23.

DIGNITY AT WORK POLICY



European
Investment Bank | Group