



### **Policy brief & purpose**

Our sexual harassment policy aims to protect men and women in our company from unwanted sexual advances and give them guidelines to report incidents. We will also explain how we handle claims, punish sexual harassment and help victims recover.

We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

### **Scope**

This policy applies to every person in our company regardless of gender, sexual orientation, level, function, seniority, status or other protected characteristics. We are all obliged to comply with this policy.

Also, we won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers and everyone interacting with our company are covered by the present policy.

### **Policy elements**

What is sexual harassment?

Sexual harassment has many forms of variable seriousness. A person sexually harasses someone when they:

- Insinuate, propose or demand sexual favours of any kind.
- Invade another person's personal space (e.g. inappropriate touching.)
- Stalk, intimidate, coerce or threaten another person to get them to engage in sexual acts.
- Send or display sexually explicit objects or messages.
- Comment on someone's looks, dress, sexuality or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable.
- Make obscene comments, jokes or gestures that humiliate or offend someone.
- Pursue or flirt with another person persistently without the other person's willing participation.

Also, flirting with someone at an inappropriate time (e.g. in a team meeting) is considered sexual harassment, even when these advances would have been welcome in a different setting. This is because such actions can harm a person's professional reputation and expose them to further harassment.

The most extreme form of sexual harassment is sexual assault. This is a serious crime and our company will support employees who want to press charges against offenders.

### **Our company's rules on sexual harassment**

- No one has the right to sexually harass our employees. Any person in our company who is found guilty of serious harassment will be dismissed, whatever their position in the company. Also, if representatives of our contractors or vendors sexually harass our employees, we will demand that the company they work for takes disciplinary action and/or refuse to work with this person in the future.
- Sexual harassment is never too minor to be dealt with. Any kind of harassment can wear down employees and create a hostile workplace. We will hear every claim and punish offenders appropriately.
- Sexual harassment is about how we make others feel. Many do not consider behaviour like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labelled in that

way. But, if something you do makes your colleagues uncomfortable, or makes them feel unsafe, you must stop.

- We assume every sexual harassment claim is legitimate unless proven otherwise. We listen to victims of sexual harassment and always conduct our investigations properly. Occasional false reports do not undermine this principle.
- We will not allow further victimisation of harassed employees. We will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits or allow others to retaliate against them.
- Those who support or overlook sexual harassment are as much at fault as offenders. Managers and HR especially are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behaviour go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to their manager or the HR department.

### **How to report sexual harassment**

If you are being sexually harassed (or suspect another person is being harassed), please report it to your manager or the HR manager. In serious cases like sexual assault, please call the police and inform your manager or the HR manager that you plan to press charges. We acknowledge it's often hard to come forward about these issues, but we need your help to build a fair and safe workplace for you and your colleagues.

If you want to report sexual harassment within our company, there are two options:

- Ask for an urgent meeting with your manager or the HR manager. Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g. emails), forward it or bring it with you to the meeting.
- Send your complaint via email. If you address it to your supervisor or manager, please copy it to the HR manager and attach any evidence or information that can be used in the investigation. HR and your supervisor or manager will discuss the issue and contact you as soon as possible.

If you report assault to the police, our company will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimised and that you have access to relevant evidence admissible in court, like security video footage or emails (without revealing confidential information about other employees.)

### **Inadvertent harassment**

Sometimes, people who harass others do not realise that their behaviour is wrong. We understand this is possible, but that doesn't make the perpetrator any less responsible for their actions.

If you suspect that someone doesn't realise their behaviour is sexual harassment under the definition of this policy, let them know and ask them to stop. Do so preferably via email so you can have records. Please do not use this approach when:

- Your manager, an upper manager, investor or customer is the perpetrator.
- Sexual harassment goes beyond the boundaries of off-hand comments, flirting or jokes.

In the above cases, report to the HR manager as soon as possible.

### **Disciplinary action and repeat offenders**

Employees who are found guilty of sexual assault will be dismissed after the first complaint and investigation.

Employees who are found guilty of sexual harassment (but not assault) the first time may:

- Be reprimanded.
- Get a "below expectations" performance review.
- See expected promotions and/or salary increases freeze [for a year.]

We may also transfer harassers or take other appropriate action to protect their victims. We will dismiss repeat offenders after the second claim against them if our investigation concludes they are indeed guilty.

We apply these disciplinary actions uniformly. Employees of any sexual orientation or other protected characteristics will be penalised the same way for the same offenses.

### **HR responsibilities**

First and foremost, HR and managers should try to prevent sexual harassment by building a culture of respect and trust. But, when sexual harassment occurs and an employee makes a complaint, both HR and managers must act immediately.

Managers should talk to HR and explain our company's procedures to their team member who made the complaint.

When HR receives a complaint that an employee harasses another employee, they will:

- Ask for as many details and information as possible from the person or people making the complaint.
- Keep copies of the report with dates, times and details of incidents and any possible evidence in a confidential file (separate from the personnel file.) HR should update this file with all future actions and conversations regarding this complaint.
- Launch an investigation. If the matter is complex, the HR person can defer to a more senior manager.
- Check if there have been similar reports on the same person. If there are, HR should contact the perpetrator's manager to let them know that their team member may get dismissed when the investigation is over.
- Inform the harassed employees of our company's procedures and their options to take legal action if appropriate.
- Take into account the wishes of the harassed employee. Some might want the matter to be resolved informally and discreetly, while others might expect more radical actions (e.g. transferring the perpetrator.) HR should consider the circumstances and decide on appropriate action.
- Contact the harasser and set up a meeting to explain the complaint and explicitly ask for this behaviour to stop, or,
- Arrange for mediation sessions with the two employees (harassed and perpetrator) to resolve the issue, if the harassed employee agrees or,
- Launch a disciplinary process depending on the severity of the harassment. In cases of sexual assault or coercing someone to sexual favours under threats, we will dismiss the harasser immediately. We will also dismiss employees who are found guilty in a court of law of sexually assaulting another employee, even if HR has not conducted its own investigation.
- HR or managers must not, under any circumstances, blame the victim, conceal a report or discourage employees from reporting sexual harassment. If HR or a manager behaves that way, please send an email to their own manager or a senior HR leader explaining the situation.

We welcome any feedback or complaints about our procedures and how our employees handled each case.

### **Helping harassment victims**

Apart from investigating claims and punishing perpetrators, we want to support the victims of sexual harassment. If you experience trauma, stress or other symptoms because of harassment, consider the following options:

- Taking a few days of sick leave to restore your mental health.
- Seeking counselling (a Google search will show counselling services in your area.)

Your job and benefits will not be jeopardized or altered if you choose any of those options or other means to recovery.

### **Speak up, we listen**

Sexual harassment can exhaust those who endure it. Speaking up about this issue is often tough for fear of not being heard, upsetting managers and challenging corporate culture.

Please don't let these fears deter you. Our company will do everything possible to stop sexual harassment and any other kind of harassment from happening, while supporting harassed employees. We need to know what's going on so we can act on it. And by raising your voice on this issue, you help our company create a happy workplace and thrive.