

Anti-Harassment Policy

Policy Number: HR-EMP-004 **Effective Date:** January 1, 2019 **Last Updated:** September 1, 2023 **Owner:** People Operations & Legal **Applies To:** All employees, contractors, interns, and third parties

Purpose

NovaTech Solutions is committed to providing a work environment free from harassment, discrimination, and bullying. This policy prohibits harassment in any form and outlines procedures for reporting and addressing concerns.

Scope

This policy applies to: - All NovaTech employees (full-time, part-time, temporary) - Contractors and consultants - Interns and volunteers - Third parties interacting with employees (vendors, customers, partners)

It covers conduct: - In the workplace (offices, remote work environments) - At company-sponsored events - During business travel - On digital platforms used for work (Slack, email, video calls) - Outside work when it affects the work environment

What is Harassment?

Definition

Harassment is unwelcome conduct based on a protected characteristic that creates an intimidating, hostile, or offensive work environment, or that interferes with work performance.

Protected Characteristics

Harassment based on any protected characteristic is prohibited, including: - Race, color, ethnicity, national origin - Religion or belief - Sex, gender, gender identity, gender expression - Sexual orientation - Age - Disability (physical or mental) - Pregnancy or related conditions - Marital or family status - Veteran or military status - Genetic information - Any other characteristic protected by law

Types of Harassment

Sexual Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: - Submission is made a condition of employment - Submission or rejection affects employment decisions - The conduct interferes with work or creates a hostile environment

Examples include: - Unwanted sexual advances or propositions - Sexual comments, jokes, or innuendos - Displaying sexually explicit materials - Unwanted touching or physical contact - Sending sexually explicit messages or images - Commenting on someone's body or appearance sexually - Spreading sexual rumors

Bullying and Intimidation

Repeated, unreasonable behavior directed at an employee that creates a risk to health and safety: - Verbal abuse, insults, or name-calling - Threatening behavior - Excessive criticism or public humiliation - Deliberately excluding someone - Undermining or sabotaging work - Spreading malicious rumors

Discriminatory Harassment

Harassment based on protected characteristics: - Racial slurs or derogatory comments - Offensive jokes about religion, ethnicity, etc. - Mocking accents or cultural practices - Derogatory comments about age, disability, etc.

Online/Digital Harassment

Harassment via digital channels: - Hostile or offensive messages (email, Slack, etc.) - Cyberbullying - Sharing embarrassing content without consent - Repeated unwanted contact

What is NOT Harassment

This policy is not intended to limit: - Legitimate, constructive performance feedback - Normal supervisory direction and management - Professional disagreement or debate - Single incidents of minor rudeness (unless severe) - Actions taken for legitimate, non-discriminatory business reasons

However, even non-harassing behavior should be professional and respectful.

Responsibilities

All Employees

- Treat colleagues with respect and dignity
- Do not engage in harassing behavior
- Speak up if you witness harassment
- Participate in harassment prevention training
- Cooperate with investigations

Managers and Leaders

All employee responsibilities, plus: - Model respectful behavior - Create an environment where employees feel safe reporting - Act immediately on reports or observed harassment - Escalate concerns to HR - Never retaliate against reporters - Ensure team completes training

Human Resources

- Maintain clear policies and procedures
- Provide training
- Receive and investigate complaints
- Take appropriate corrective action
- Protect confidentiality to the extent possible
- Prevent retaliation

Reporting Harassment

If You Experience Harassment

1. **Document:** Note dates, times, witnesses, and details
2. **Tell the person to stop** (if comfortable): Sometimes people don't realize their behavior is unwelcome
3. **Report:** You are encouraged to report harassment through available channels

Reporting Channels

- **Your manager** (unless they're involved)
- **HR:** hr@novatech.com or any HR team member
- **Skip-level manager**
- **Ethics hotline:** ethics@novatech.com
- **Anonymous reporting:** novatech.ethicspoint.com

You may choose any channel. You do not need to report to your manager first.

What to Include in a Report

- Who was involved
- What happened
- When and where it occurred
- Any witnesses
- Any documentation
- How it affected you

If You Witness Harassment

- Report what you observed
- Offer support to the affected person
- Do not spread information about the incident

Investigation Process

Receipt of Complaint

- Complaint acknowledged within 1 business day
- Initial assessment conducted
- Interim measures implemented if needed

Investigation

- Conducted by HR or designated investigator
- Interviews with complainant, accused, and witnesses
- Review of relevant documentation
- Typically completed within 30 days
- Confidentiality maintained to the extent possible

Resolution

- Findings documented
- Appropriate action taken
- Complainant informed of outcome (to extent permitted)
- Follow-up to ensure no retaliation

Interim Measures

During investigation, measures may include: - Separating the parties - Adjusting reporting relationships - Modifying work schedules or locations - Placing accused on administrative leave - Other measures to protect parties and ensure fair investigation

Consequences

Employees found to have engaged in harassment may face: - Verbal or written warning - Required training or counseling - Performance impact - Demotion - Termination

Consequences depend on: - Severity of the conduct - Pattern of behavior - Impact on the victim - Employee's history - Other relevant factors

No Retaliation

NovaTech strictly prohibits retaliation against anyone who: - Reports harassment in good faith - Participates in an investigation - Opposes discriminatory practices

Retaliation includes: - Termination or demotion - Negative performance reviews - Exclusion from opportunities - Hostile treatment - Any adverse employment action

Retaliation is itself a serious violation that will result in disciplinary action, up to and including termination.

If you experience retaliation, report it immediately.

False Reports

Knowingly making false accusations is prohibited and may result in disciplinary action. However, a complaint made in good faith that cannot be substantiated is not a false report.

Training

All employees must complete anti-harassment training: - During onboarding - Annually thereafter - Additional training for managers

Training covers: - Recognizing harassment - Reporting procedures - Bystander intervention - Creating a respectful workplace

Confidentiality

Reports are handled confidentially to the extent possible. Information is shared only on a need-to-know basis for investigation and resolution. Complete confidentiality cannot always be guaranteed, but we strive to protect privacy.

Third-Party Harassment

If you are harassed by a customer, vendor, or other third party: - Report it using the same channels - NovaTech will take appropriate action - We will not require you to continue working with harassers

Support Resources

Internal

- HR: hr@novatech.com
- Employee Assistance Program: 1-800-555-0199

External

- EEOC: www.eeoc.gov
- State fair employment agencies
- Legal counsel (your choice)

Questions

For questions about this policy, contact People Operations at hr@novatech.com or via [#ask-hr](#) on Slack.

Related Documents: Code of Conduct (HR-EMP-005), Equal Opportunity Policy (HR-EMP-003), Whistleblower Policy (COMP-INT-005), Workplace Violence Policy (HR-EMP-021)