

# **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.

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*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)*