

Anti-Harassment & Workplace Respect Policy

Version: 2025-01

Company: NMT

Region: Global (EN)

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1. Purpose and Scope

This policy affirms NMT's commitment to creating and maintaining a workplace environment where all individuals—regardless of role, identity, background, or location—are treated with dignity and respect. NMT aims to ensure that its global workforce operates in a setting free from harassment, bullying, discrimination, and any behavior that compromises physical safety, emotional well-being, or professional integrity.

This policy applies to:

- All employees, whether full-time, part-time, temporary, or contract-based
 - Interns, trainees, and apprentices
 - Vendors, suppliers, and external partners
 - Clients, visitors, and any third parties interacting with NMT
 - All work environments, including physical offices, client sites, remote work locations, virtual platforms, and off-site events
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2. Definitions

2.1 Harassment

Unwelcome conduct—verbal, non-verbal, physical, visual, or digital—that directly or indirectly creates an intimidating, hostile, humiliating, or offensive work environment. Harassment may occur as a single severe incident or through a pattern of repeated actions.

2.2 Sexual Harassment

Any unwelcome sexual advance, request for sexual favors, or any form of verbal, non-verbal, or physical conduct of a sexual nature. This includes behaviors that imply employment-related consequences, affect professional decision-making, or create an uncomfortable or hostile workplace.

2.3 Bullying

Repeated, unreasonable, or abusive behavior intended to intimidate, degrade, or harm an individual. Bullying can manifest through verbal aggression, social exclusion, manipulation of work responsibilities, or deliberate attempts to undermine confidence and performance.

2.4 Hostile Work Environment

A workplace condition wherein severe, persistent, or pervasive hostility, discrimination, or harassment interferes with an individual's ability to work effectively, impacts mental or emotional health, or creates a pervasive climate of fear or discomfort.

2.5 Retaliation

Any adverse action taken against an individual for reporting harassment, raising concerns, participating in inquiries, or supporting another employee's complaint. Retaliation includes demotion, exclusion, negative evaluations, or any form of penalizing conduct.

2.6 Workplace Respect

A foundational expectation at NMT that all individuals interact with professionalism, courtesy, fairness, and cultural sensitivity. Respect includes valuing diverse perspectives, fostering psychological safety, and promoting a collaborative environment.

3. Guiding Principles

- **Dignity:** Every individual deserves to work in an environment that upholds personal and professional dignity.
- **Respect:** All communication and interactions must reflect courtesy and professionalism.
- **Zero Tolerance for Harassment:** NMT enforces strict non-negotiable standards against any form of harassment.
- **Inclusiveness:** NMT supports a culture where differences are valued and all individuals can contribute meaningfully.

4. Applicability

This policy applies across all global operations of NMT and governs interactions that occur:

- In the workplace or on company premises
- During work-related travel or off-site assignments
- At company-sponsored events, conferences, or training programs

- Through digital communication channels or collaboration tools
 - In any situation where individuals interact in a professional capacity on behalf of NMT
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5. Prohibited Behaviors with Examples

5.1 Verbal

Includes spoken or written comments that demean, insult, or offend. Examples include derogatory remarks about personal traits, repeated offensive jokes, inappropriate comments about physical appearance, or mocking accents, cultures, or identities.

5.2 Physical

Includes any form of unwanted physical interaction or behavior that attempts to control, intimidate, or threaten. Examples include intentional touching without consent, physical blocking of movement, or aggressive gestures meant to instill fear.

5.3 Digital/Online

Includes misconduct executed through electronic devices or communication platforms. Examples include sending inappropriate or suggestive messages, sharing explicit or offensive content, cyberbullying, or posting harassing material on social media.

5.4 Subtle Forms

Includes indirect behaviors that gradually erode well-being or professional confidence. Examples include deliberate exclusion from meetings or communications, spreading false information, undermining contributions, or intentionally withholding resources.

6. Responsibilities of Employees and Managers

6.1 Employees

Employees are expected to:

- Demonstrate respect and professionalism in all interactions
- Refrain from behaviors that violate this policy
- Report any observed or experienced incidents promptly
- Participate fully in awareness, training, and remediation activities
- Support a culture of openness and accountability

6.2 Managers

Managers play a critical role in maintaining a respectful environment and are required to:

- Model appropriate conduct and set clear behavioral expectations
 - Respond promptly and appropriately to concerns or complaints
 - Maintain confidentiality when handling sensitive information
 - Ensure team members understand this policy and related procedures
 - Collaborate with HR in investigations and resolution processes
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7. Reporting Procedures

Employees and stakeholders may report concerns through any of the following channels:

1. **Contact HR:** Speak directly with a Human Resources representative or submit a written complaint.
2. **Anonymous Hotline:** +1-800-000-1234, available 24/7 for confidential reporting.
3. **Ethics Email Channel:** ethics@nmt.com for secure submission of concerns and supporting evidence.

Reports may be made anonymously, though providing contact information may facilitate thorough follow-up.

8. Confidentiality and Protection Against Retaliation

NMT ensures that all reports are treated with sensitivity and confidentiality. Information will be shared only with individuals responsible for assessment and resolution. Retaliation against any individual who files a complaint or participates in an investigation is strictly prohibited and may result in disciplinary action up to and including termination.

9. Investigation Process

Investigations at NMT follow a structured and impartial process:

1. **Initial Report Received:** HR documents and acknowledges the complaint.
2. **HR Assessment:** Preliminary review to determine scope and urgency.

3. **Formal Investigation:** Fact-finding through interviews, evidence review, and analysis.
4. **Findings Communicated:** Summary of results shared with relevant parties.
5. **Corrective Action Implemented:** Appropriate measures taken to address behavior and prevent recurrence.

Roles:

- **Human Resources:** Leads investigations, ensures compliance, and documents outcomes.
 - **Managers:** Provide information, support inquiries, and enact remediation steps.
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10. Corrective Actions and Possible Disciplinary Measures

Depending on severity and investigation outcomes, corrective actions may include:

- Verbal or written warnings
 - Mandatory training or coaching
 - Adjustment of responsibilities or reassignment
 - Suspension pending investigation completion
 - Termination of employment or contract
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11. Prevention and Training Programs

NMT invests in proactive initiatives to prevent misconduct and foster a respectful workplace. Programs may include:

- Comprehensive awareness sessions addressing harassment prevention
 - Bystander intervention workshops to empower employees to act responsibly
 - Annual mandatory training for all employees
 - Specialized training for managers on handling complaints and recognizing early signs of misconduct
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12. Support Resources

Employees affected by harassment or workplace misconduct may access support services such as:

- The Employee Assistance Program (EAP) for confidential counseling
 - Peer support groups and well-being circles
 - Mental health professionals and resilience-building resources
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13. Monitoring, Audits, and Policy Review

NMT regularly reviews this policy to ensure compliance with evolving legal standards and organizational needs. Annual audits, feedback surveys, incident trend analysis, and leadership review sessions inform continuous improvements.

14. Case Studies

14.1 Digital Harassment

An employee received repeated inappropriate messages via internal communication tools. Following a thorough investigation, corrective actions included formal warnings and mandatory digital conduct training.

14.2 Verbal Harassment

A manager made derogatory comments toward a subordinate during team meetings. HR intervened, and the manager was assigned to leadership behavior training and monitoring.

14.3 Bullying

A team member was intentionally excluded from collaborative activities. Facilitated discussions and coaching were conducted, resulting in improved team dynamics and accountability measures.

14.4 Gender-Based Harassment

An employee reported unwanted advances from a colleague. After investigation, the offender was suspended, and the team received refresher training on gender respect and professional boundaries.

14.5 Cross-Cultural Misunderstanding

Comments made without malicious intent caused discomfort due to cultural differences. The situation was resolved through cultural sensitivity workshops and guidance for inclusive communication.

15. Complaint Handling Process Flow

1. Employee reports incident
2. HR acknowledges receipt
3. Initial assessment conducted
4. Formal investigation initiated
5. Findings documented and shared
6. Corrective action taken

16. Sample Forms

16.1 Complaint Form

- Name
- Date
- Incident description
- Names of witnesses
- Preferred contact method

16.2 Manager Acknowledgment Form

- Manager name
- Date received
- Summary of incident
- Initial actions taken

17. Appendix: Global References

- International Labour Organization (ILO) Standards
- European Union Equality and Anti-Discrimination Directives
- U.S. Equal Employment Opportunity Commission (EEOC) Guidelines

- Additional region-specific legal requirements applicable to NMT operations

This policy reflects NMT's commitment to sustaining a respectful, safe, and inclusive workplace environment in which all individuals can thrive and contribute to organizational success.