

Anti-Harassment & Workplace Respect Policy

Version: 2025-01

Company: [NMT]

Region: Global (EN)

1. Purpose and Scope

This policy establishes NMT's commitment to maintaining a safe, respectful, and inclusive workplace. It applies to all employees, contractors, interns, and third parties interacting with the organization across all global locations.

2. Definitions

2.1 Harassment

Unwelcome behavior that creates an intimidating, hostile, or offensive environment.

2.2 Sexual Harassment

Unwelcome sexual advances, requests for sexual favors, or conduct of a sexual nature in any form.

2.3 Bullying

Repeated, intentional behavior intended to intimidate, harm, or undermine an individual.

2.4 Hostile Work Environment

A workplace where pervasive or severe harassment impacts job performance or well-being.

2.5 Retaliation

Adverse actions taken against someone for reporting harassment or participating in investigations.

2.6 Workplace Respect

Treating all individuals with dignity, valuing contributions regardless of background or role.

3. Guiding Principles

- Dignity
- Respect

- Zero tolerance for harassment
 - Inclusiveness
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4. Applicability

This policy applies to employees, contractors, interns, vendors, clients, and visitors.

5. Prohibited Behaviors with Examples

5.1 Verbal

- Derogatory remarks
- Offensive jokes
- Unwelcome comments about appearance

5.2 Physical

- Unwanted touching
- Blocking movement
- Physical intimidation

5.3 Digital/Online

- Inappropriate messages
- Offensive shared content
- Harassing social media activity

5.4 Subtle Forms

- Excluding colleagues
 - Spreading rumors
 - Undermining work
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6. Responsibilities of Employees and Managers

6.1 Employees

- Treat others with respect
- Report incidents
- Participate in training

6.2 Managers

- Create a respectful environment
 - Address reports promptly
 - Ensure team awareness of responsibilities
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7. Reporting Procedures

1. Contact HR
 2. Use the anonymous hotline [Hotline Number]
 3. Email the ethics channel [Ethics Email Address]
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8. Confidentiality and Protection Against Retaliation

All reports will be handled confidentially to the extent possible. Retaliation for reporting or participating in investigations is strictly prohibited.

9. Investigation Process

1. Initial report received
2. HR assessment
3. Formal investigation
4. Findings communicated
5. Corrective action implemented

Roles

- HR oversees and ensures compliance
 - Managers support investigations
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10. Corrective Actions and Possible Disciplinary Measures

- Verbal or written warnings
 - Mandatory training
 - Suspension
 - Termination
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11. Prevention and Training Programs

- Awareness programs
 - Bystander intervention training
 - Annual mandatory training
 - Manager-specific training
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12. Support Resources

- Employee Assistance Program
 - Peer support groups
 - Mental health resources
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13. Monitoring, Audits, and Policy Review

The policy will be reviewed annually and evaluated through audits, feedback, and monitoring processes.

14. Case Studies

14.1 Digital Harassment

Inappropriate repeated messages; resolved with investigation and warnings.

14.2 Verbal Harassment

Derogatory comments from a manager; resolved through HR intervention and sensitivity training.

14.3 Bullying

Exclusion from team activities; addressed through facilitated discussions and corrective action.

14.4 Gender-Based Harassment

Unwanted advances; resulted in suspension after investigation.

14.5 Cross-Cultural Misunderstanding

Insensitive jokes; addressed with cultural sensitivity training.

15. Complaint Handling Process Flow

1. Employee reports incident
 2. HR acknowledges
 3. Initial assessment
 4. Investigation
 5. Findings shared
 6. Corrective action taken
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16. Sample Forms

16.1 Complaint Form

- Name
- Date
- Incident description
- Witnesses
- Preferred contact method

16.2 Manager Acknowledgment Form

- Manager name
 - Date
 - Summary
 - Actions taken
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17. Extended FAQ

- (1) Definition of harassment
- (2) Reporting options
- (3) Retaliation protections
- (4) Confidentiality details
- (5) Investigation timeline
- (6) Consequence types
- (7) Training availability
- (8) Support resources
- (9) Anonymous reporting
- (10) Witness reporting guidance

- (11) Policy review frequency
- (12) How to ask questions

18. Appendix: Global References

- ILO standards
- EU equality directives
- EEOC guidelines

This policy reflects NMT commitment to ensuring a respectful, safe, and inclusive work environment for all.