pAI

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Policy Title: Anti-Sexual Harassment Policy

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9. Purpose

This policy reaffirms pAI’s unwavering commitment to providing a work environment free from sexual harassment. It prohibits all forms of sexual harassment and retaliation, establishes a clear reporting and investigation process, and ensures prompt and appropriate corrective action for any violations.

1. Scope

This policy applies to all pAI employees, including permanent, temporary, part-time, and contract staff, as well as interns, applicants, vendors, clients, and visitors ("Individuals"). It covers conduct occurring on company premises, at company-sponsored events, during business travel, and in any work-related context, including interactions via electronic communication and social media, regardless of location.

1. Definitions

| **Term** | **Definition** |
| --- | --- |
| **Complainant** | An Individual who alleges they have been subjected to sexual harassment. |
| **Hostile Work Environment** | Unwelcome conduct of a sexual nature that is severe or pervasive enough to alter the conditions of an individual’s employment and create an abusive working environment. |
| **Quid Pro Quo Harassment** | When employment decisions (e.g., hiring, promotion, termination, compensation) are conditioned upon submission to or rejection of unwelcome sexual advances. |
| **Respondent** | An Individual against whom an allegation of sexual harassment has been made. |
| **Retaliation** | Any adverse action taken against an Individual for reporting sexual harassment, participating in an investigation, or opposing a practice forbidden by this policy. |
| **Sexual Harassment** | Unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. |
| **Unwelcome Conduct** | Conduct of a sexual nature that is not solicited or desired by the recipient and is perceived as undesirable or offensive by the recipient. |
| **Witness** | An Individual who has observed or has information relevant to an alleged incident of sexual harassment. |

1. Policy Statement

4.1 pAI explicitly prohibits all forms of sexual harassment, whether perpetrated by managers, supervisors, co-workers, clients, vendors, or any other Individual interacting with pAI personnel.

4.2 Sexual harassment includes, but is not limited to:

\* Unwelcome sexual advances or propositions.

\* Requests for sexual favors.

\* Verbal conduct such as sexual jokes, innuendoes, suggestive comments, explicit discussions of sexual acts, or graphic descriptions of a sexual nature.

\* Nonverbal conduct such as sexually suggestive gestures, displaying sexually explicit materials (e.g., pictures, cartoons, objects), or staring in a sexually suggestive manner.

\* Physical conduct such as unwelcome touching, grabbing, brushing against, or assault.

\* Any conduct that creates a hostile, intimidating, or offensive work environment based on sex.

4.3 Retaliation against any Individual who reports sexual harassment in good faith, participates in an investigation, or opposes sexual harassment is strictly prohibited and will result in disciplinary action.

4.4 All complaints of sexual harassment will be treated with seriousness, investigated promptly, thoroughly, and impartially, and handled with the utmost confidentiality possible, consistent with the need to conduct a thorough investigation and take appropriate corrective action.

1. Procedures / Guidelines

5.1 Reporting Sexual Harassment

5.1.1 Any Individual who believes they have been subjected to sexual harassment, or who witnesses sexual harassment, is strongly encouraged to report the incident immediately.

5.1.2 Reporting Channels: Individuals may report to:

\* Their immediate supervisor or manager.

\* Any Human Resources representative.

\* A senior manager or department head.

\* Any member of pAI's Senior Leadership or Legal department.

\* Designated confidential reporting hotline (if applicable).

5.1.3 Information to Provide: To facilitate a thorough investigation, the Complainant should provide as much detail as possible, including:

\* The name(s) of the Respondent(s).

\* A detailed description of the unwelcome conduct, including dates, times, and locations of incidents.

\* The names of any witnesses.

\* Any actions taken by the Complainant to indicate the conduct was unwelcome.

\* Any other relevant documentation or evidence.

5.1.4 While a written complaint is preferred, pAI will investigate verbal complaints. Anonymous complaints will be investigated to the extent possible, given the limitations of lacking direct contact with the Complainant.

5.2 Investigation Process

5.2.1 Upon receipt of a complaint, HR (or a designated investigator) will promptly initiate an investigation.

5.2.2 **Initial Assessment:** The investigator will first determine if the alleged conduct falls within the scope of this policy and whether immediate interim measures (e.g., temporary reassignment of duties, separation of parties) are necessary to ensure the safety and well-being of all parties involved.

5.2.3 Fact-Finding: The investigation will typically involve:

\* Interviewing the Complainant to gather full details of the allegations.

\* Interviewing the Respondent to obtain their response to the allegations.

\* Interviewing any identified witnesses.

\* Reviewing any relevant documents, emails, messages, or other evidence.

5.2.4 **Confidentiality:** All parties involved in the investigation are expected to maintain confidentiality regarding the allegations and the investigation process to protect the integrity of the process and the privacy of individuals. Information will only be shared on a "need-to-know" basis.

5.2.5 **Fair Process:** Both the Complainant and the Respondent will have the opportunity to present their perspectives and any supporting evidence. The investigation will be conducted objectively and impartially, without prejudgment.

5.2.6 **Conclusion and Report:** Upon completion, the investigator will prepare a report summarizing the findings and make a recommendation regarding whether the policy has been violated.

5.3 Resolution and Corrective Action

5.3.1 If the investigation concludes that sexual harassment or retaliation has occurred, pAI will take prompt and effective corrective action tailored to the severity and nature of the misconduct.

5.3.2 Disciplinary Measures: Corrective actions may include, but are not limited to:

\* Verbal or written warnings.

\* Mandatory training and counseling.

\* Changes in work assignments or work location.

\* Suspension without pay.

\* Demotion.

\* Termination of employment.

5.3.3 The Complainant will be informed that action has been taken, without disclosing specific disciplinary details that may violate the Respondent's privacy.

5.3.4 pAI will also take steps to prevent recurrence of similar conduct and to remedy any negative effects on the Complainant or the work environment.

5.3.5 **No Retaliation:** Any Individual found to have engaged in retaliation will be subject to immediate disciplinary action, up to and including termination.

1. Responsibilities

| **Role** | **Obligation** |
| --- | --- |
| **All Individuals** | Treat all colleagues with respect. Refrain from any form of sexual harassment or retaliation. Report any incidents of sexual harassment they experience or witness. Cooperate fully and truthfully in any investigation. |
| **Managers / Supervisors** | Immediately report any complaints of sexual harassment received or observed to HR. Take all necessary steps to prevent and address sexual harassment in their teams. Ensure employees are aware of this policy and reporting procedures. Lead by example in fostering a respectful work environment. |
| **Human Resources** | Be responsible for the development, implementation, and enforcement of this policy. Conduct prompt, thorough, and impartial investigations into all complaints. Recommend and implement appropriate corrective actions. Provide training to employees and managers on sexual harassment prevention. Maintain confidentiality to the extent possible. |
| **Senior Leadership** | Demonstrate a visible commitment to a harassment-free workplace. Ensure adequate resources are allocated for policy implementation, training, and investigation. Support HR in taking appropriate action. |

1. Compliance & Consequences

7.1 All Individuals are required to comply with this Anti-Sexual Harassment Policy. Violation of this policy will result in disciplinary action up to and including immediate termination of employment, regardless of the Individual's position or length of service.

7.2 pAI reserves the right to take legal action against individuals who engage in sexual harassment or retaliation, where applicable, in addition to internal disciplinary measures.

7.3 Individuals found to have knowingly made false accusations will also be subject to disciplinary action.

1. Review & Revision History

| **Version** | **Date** | **Description** | **Author** |
| --- | --- | --- | --- |
| 1.0 | 2025-07-01 | Initial release | HR Director |