

ANTI-SEXUAL HARASSMENT POLICY

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1. POLICY STATEMENT

The Company is committed to providing a safe, respectful, and harassment-free workplace for all employees in accordance with Nigerian law. Sexual harassment in any form will not be tolerated and will be dealt with severely.

2. LEGAL FRAMEWORK

This policy is established in accordance with: - **Violence Against Persons (Prohibition) Act 2015 (VAPP Act)** - Sections 1-4 (Sexual Offences) - **Criminal Code Act (Cap C38 LFN 2004)** - Sections 218, 221, 360 (Southern Nigeria) - **Penal Code (Northern Nigeria)** - Sections 284-285 - **Constitution of Nigeria 1999 (as amended)** - Section 34 (Right to Dignity), Section 42 (Non-discrimination) - **Nigerian Labour Act (Cap L1 LFN 2004)** - Section 55(1) (Protection of women) - **Employee Compensation Act 2010** - Workplace injury from harassment

2.1 Key Legal Provisions

Under the **VAPP Act 2015**: - Section 1: Rape carries minimum 12 years imprisonment - Section 2: Inflicting physical injury on a person carries 5 years imprisonment - Section 4: Emotional, verbal, psychological abuse carries 3 years imprisonment - Section 14: Sexual harassment carries minimum 3 years imprisonment

3. PURPOSE

This policy aims to: - Define sexual harassment and its various forms under Nigerian law - Establish clear reporting procedures - Outline investigation processes - Specify consequences for violations - Protect victims from retaliation - Ensure compliance with Nigerian legal requirements

4. SCOPE

This policy applies to: - All employees regardless of position or tenure - All workplace locations including remote work - Work-related events and travel - Digital communications and social media - Interactions with clients, vendors, and visitors - All company operations within the Federal Republic of Nigeria

5. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment, as defined under Section 14 of the VAPP Act 2015, is any unwelcome conduct of a sexual nature that: - Creates a hostile, intimidating, or offensive work environment - Affects an individual's work performance - Is made a condition of employment or advancement

4.1 Forms of Sexual Harassment

Quid Pro Quo

- Demands for sexual favours in exchange for job benefits
- Threats of negative consequences for refusing advances
- Promises of rewards for sexual compliance

Hostile Work Environment

- Unwelcome sexual advances or propositions
- Sexual comments, jokes, or innuendos
- Display of sexually explicit materials
- Inappropriate physical contact
- Leering or staring
- Sexual gestures
- Spreading sexual rumours

4.2 Examples of Prohibited Conduct

Category	Examples
Physical	Unwanted touching, hugging, kissing, blocking movement
Verbal	Sexual comments, requests for dates after refusal, whistling
Non-verbal	Leering, sexual gestures, displaying explicit images
Digital	Sexually explicit emails, messages, images, or posts

5. RESPONSIBILITIES

5.1 Management Responsibilities

- Model appropriate behaviour
- Respond promptly to complaints
- Maintain confidentiality
- Prevent retaliation
- Attend harassment prevention training

5.2 Employee Responsibilities

- Maintain professional conduct
- Report harassment immediately
- Cooperate with investigations
- Support affected colleagues
- Attend mandatory training

5.3 Human Resources Responsibilities

- Receive and investigate complaints
- Maintain confidential records
- Recommend appropriate action
- Conduct training programs
- Monitor workplace culture

6. REPORTING PROCEDURES

6.1 How to Report

Complaints may be submitted through: 1. **Direct Supervisor** (if not the alleged harasser) 2. **Human Resources Department** - hr@company.com 3. **Anonymous Hotline** - 0800-XXX-XXXX 4. **Online Portal** - complaints.company.com 5. **Written Report** - Sealed envelope to HR Director

6.2 Information Required

- Names of parties involved
- Date(s), time(s), and location(s)
- Description of incident(s)
- Names of witnesses
- Any supporting evidence
- Desired resolution

6.3 Third-Party Reports

Witnesses to harassment are encouraged to report incidents even if the victim has not complained.

7. INVESTIGATION PROCESS

7.1 Timeline

Stage	Timeframe
Acknowledge complaint	Within 24 hours
Begin investigation	Within 3 business days
Complete investigation	Within 21 business days
Communicate outcome	Within 5 business days of completion

7.2 Investigation Steps

1. Receive and document complaint
2. Appoint impartial investigator
3. Interview complainant
4. Interview respondent
5. Interview witnesses
6. Gather evidence
7. Analyze findings

8. Prepare report
9. Recommend action
10. Communicate outcome

7.3 Investigation Principles

- Presumption of innocence
- Confidentiality to extent possible
- Impartiality and fairness
- Thorough documentation
- No retaliation

8. INTERIM MEASURES

During investigation, the Company may: - Separate the parties - Adjust work schedules - Provide administrative leave - Restrict access to certain areas - Provide counselling support

9. CONSEQUENCES OF VIOLATION

Confirmed harassment may result in:

For Employees

- Verbal or written warning
- Mandatory counselling
- Transfer to another department
- Suspension without pay
- Demotion
- Termination of employment

For Managers

- Removal from supervisory role
- Reduction in compensation
- Immediate termination

Legal Consequences

Under Nigerian Law: - **VAPP Act 2015**: Minimum 3 years imprisonment for sexual harassment (Section 14) - **Criminal Code Act**: Up to 3 years for indecent assault (Section 360) - **Cyber-crimes Act 2015**: Up to 7 years for sexual exploitation via electronic means - Civil liability for damages to victims - Report to Nigeria Police Force - Prosecution by Director of Public Prosecutions

11. PROTECTION FROM RETALIATION

The Company strictly prohibits retaliation against anyone who: - Reports harassment in good faith - Participates in an investigation - Supports a complainant

Retaliation will be treated as a separate violation and disciplined accordingly.

11. FALSE ACCUSATIONS

While the Company encourages reporting, knowingly making false accusations is a serious offence that may result in disciplinary action up to termination.

12. SUPPORT RESOURCES

Internal Support

- Employee Assistance Program (EAP)
- HR Counselling Services
- Peer Support Network

External Support (Nigerian Organizations)

- **Lagos State Domestic & Sexual Violence Response Team (DSVRT):** 08137960048, 112
- **WARIF (Women at Risk International Foundation):** 08092100009 (24hr crisis line)
- **Mirabel Centre (Lagos):** 07013491769 - Free medical, legal, and counselling services
- **Project Alert on Violence Against Women:** 08083210003
- **National Human Rights Commission:** 08006472428
- **Nigeria Police Emergency Line:** 112 or 199
- **National Agency for the Prohibition of Trafficking in Persons (NAPTIP):** 07030000203
- **Federal Ministry of Women Affairs**

Legal Aid Resources

- **Legal Aid Council of Nigeria:** Free legal services for victims
- **Nigerian Bar Association:** Pro bono legal assistance
- **FIDA (International Federation of Women Lawyers) Nigeria:** Free legal support for women

13. TRAINING REQUIREMENTS

Training	Frequency	Duration
All Employees	Annual	2 hours
Managers	Annual	4 hours
HR Personnel	Bi-annual	8 hours
New Hires	Within 30 days	2 hours

14. RECORD KEEPING

- Complaints retained for minimum 7 years
- Training records retained for 5 years
- Investigation files secured with restricted access

15. POLICY REVIEW

This policy is reviewed annually and updated as necessary to reflect: - Legal requirements - Best practices - Organizational learning

Approved by: Chief Executive Officer **HR Director:** [Name] **Date:** December 15, 2024

All employees must acknowledge receipt and understanding of this policy.