

Anti-Harassment & Anti-Discrimination Policy

1. Purpose

The Company is committed to maintaining a workplace free from harassment, discrimination, and retaliation. This policy ensures that all employees are treated with dignity, respect, and fairness, fostering a positive and inclusive environment.

2. Scope

This policy applies to all employees, contractors, interns, volunteers, and third parties associated with the Company across all locations and functions.

3. Definitions

Harassment: Unwelcome conduct, whether verbal, physical, or visual, that creates an intimidating, hostile, or offensive work environment. Includes sexual harassment, bullying, and other forms of abusive behavior.

Discrimination: Unfair treatment based on protected characteristics such as race, gender, age, religion, nationality, disability, sexual orientation, or any other status protected by law.

Protected Characteristics: Attributes protected under local, state, or federal laws, including but not limited to race, color, religion, sex, national origin, age, disability, and genetic information.

4. Policy Statement

- The Company strictly prohibits harassment and discrimination of any kind.
- Any behavior that violates this policy will be investigated promptly and may result in disciplinary action, up to and including termination.
- Retaliation against individuals who report violations or participate in investigations is strictly forbidden.

5. Examples of Prohibited Conduct

- **Sexual Harassment:** Unwanted sexual advances, requests for sexual favors, inappropriate touching, or any conduct of a sexual nature that affects employment conditions or creates a hostile work environment.
- **Verbal Harassment:** Insults, slurs, jokes, or threats related to a person's protected characteristics.
- **Physical Harassment:** Unwanted physical contact, assault, or blocking movement.
- **Visual Harassment:** Displaying offensive or derogatory images, cartoons, emails, or texts.

- **Bullying:** Repeated aggressive behavior intended to intimidate or humiliate.
- **Discriminatory Practices:** Unequal treatment in hiring, promotion, pay, training, or termination based on protected characteristics.

6. Responsibilities

Employees

- Treat others with respect and dignity.
- Refrain from participating in or condoning harassment or discrimination.
- Report any incidents promptly.

Managers & Supervisors

- Model appropriate behavior.
- Take immediate action when witnessing or being informed of violations.
- Ensure investigations are conducted fairly and confidentially.

Human Resources

- Provide training and resources on harassment and discrimination prevention.
- Manage complaints and investigations.
- Monitor compliance with the policy.

7. Reporting Procedures

- Reports can be made verbally or in writing to any of the following:
 - Immediate supervisor or manager
 - Human Resources department
 - Designated Ethics or Compliance Officer
- Anonymous reporting options (e.g., hotline, email) may be available.
- All reports will be taken seriously and handled promptly.

8. Investigation Process

- Investigations will be conducted impartially, maintaining confidentiality to the extent possible.
- Both complainant and accused will have the opportunity to present their side.

- Investigators will collect evidence, interview witnesses, and review relevant documents.
- A determination will be made, and corrective actions will be communicated to the parties involved.

9. Corrective Actions

- Depending on the severity and findings, actions may include:
 - Counseling or training
 - Written warnings
 - Suspension or demotion
 - Termination of employment
- The Company may also take steps to prevent further incidents, such as changes in reporting lines or work locations.

10. Retaliation Prohibition

- Any retaliation against employees who report violations or participate in investigations is strictly prohibited.
- Retaliatory acts will result in disciplinary measures, independent of the original complaint's outcome.

11. Training & Awareness

- The Company will provide mandatory training on anti-harassment and anti-discrimination policies to all employees during onboarding and regularly thereafter.
- Supervisors and managers will receive additional training on handling complaints and maintaining a respectful workplace.

12. Record Keeping

- All complaints and investigation records will be securely maintained by HR in compliance with privacy laws.
- Documentation will be used for monitoring, auditing, and continuous improvement of workplace culture.

13. Legal Compliance

- This policy complies with all applicable laws and regulations regarding workplace harassment and discrimination.

- Where local laws provide greater protection, those laws shall prevail.

14. Additional Resources

- Employees may access counseling, employee assistance programs (EAP), or legal advice as needed.
- HR will provide guidance on accommodations related to disabilities or religious practices.

15. Policy Review

- This policy will be reviewed annually or as required by changes in legislation or organizational needs.
 - Updates will be communicated promptly to all employees.
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