

Policy: Workplace Harassment	Effective Date: 1 <sup>st</sup> Oct 2018
Issue: HR/006	

### 1.01 State of Purpose:

Our sexual harassment policy aims to protect men and women in our company from unwanted sexual advances and give them guidelines to report incidents. We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

### 1.02 Scope

This policy applies to every person in our company regardless of gender, sexual orientation, level, function, seniority, status or other protected characteristics. We are all obliged to comply with this policy. We won't tolerate sexual harassment from investors, contractors, customers and everyone interacting with our company.

### 1.05 Policy Highlights

Sexual harassment has many forms of variable seriousness. A person sexually harasses someone when they:

- Insinuate, propose or demand sexual favors of any kind
- Invade another person's personal space (e.g. inappropriate touching.)
- Stalk, intimidate, force or threaten another person to get them to engage in sexual acts.
- Send or display sexually explicit objects or messages.
- Comment on someone's looks, dress, sexuality or gender in an offensive or objectifying manner.
- Make obscene comments, jokes or gestures that humiliate or offend someone.

### 1.03 Procedure

If you want to report sexual harassment within our company, there are two options:

- Send your complaint via email to HR. Attach any evidence or information that can be used in the investigation. HR and CEO will discuss the issue and contact you as soon as possible.
- Ask for an urgent meeting with our HR Director. Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g. emails, messages, photos or videos), forward it.

If you report assault to the police, our company will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimized and that you have access to relevant evidence admissible in court.

### 1.04 Consequences

Employees who are found guilty of sexual assault will be terminated after the first complaint and investigation.

Employees who are found guilty of sexual harassment (but not assault) the first time may:

- Be reprimanded, fined and issued a final warning letter
- See expected promotions and/or salary increases freeze for 6 months

We may also transfer harassers or take other appropriate action to protect their victims. We will terminate repeat offenders after the second claim against them if our investigation concludes they are indeed guilty.

***We apply these disciplinary actions uniformly. Employees, management or CEO of any sexual orientation or other protected characteristics will be penalized the same way for the same offenses.***