



# Policy Against Discrimination, Retaliation, Harassment, and Workplace Violence

Date of Policy Statement: October 2022

## 1. Purpose and scope

The organization is committed to discouraging all forms of unlawful harassment, discrimination and retaliation abiding by all applicable national and local laws. This policy applies to all applicants, employees, independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with the organization (“related personnel”).

There will be no harassment, retaliation or discrimination because of race, ethnicity, national origin, religion or belief, age, marital or civil partnership status, sexual orientation, gender, gender identity, pregnancy, pregnancy-related condition, military or veteran status, disability, genetic information, victim of domestic violence or assault, or any other status protected by law. These will collectively be referred to as the 'protected characteristics', for the purposes of this policy. This policy extends to all aspects of the relationship, including, but not limited to, decisions involving compensation, terms and conditions and privileges.

The organization will not limit, segregate, classify or otherwise treat related personnel in any way that would tend to deprive anyone of opportunities. Any conduct that interferes with another’s performance, or creates a hostile, intimidating, humiliating, degrading, aversive or offensive work environment is illegal and will not be tolerated and may result in immediate disciplinary action.

Anyone who believes that they witnessed or has been the victim of illegal discrimination, retaliation or harassment should utilize the procedures for resolving complaints located in this policy under the heading “Complaint Policy and Procedure.” There will be no retaliation againstor discrimination, harassment, or adverse treatment of anyone because of their use of this procedure to resolve a complaint brought in good faith.

Humentum is committed to maintaining a safe work environment free of violence of any sort. Acts or threats of violence, including threats to do bodily harm or property damage, directed in any way toward another related personnel or the organization may result termination of the relationship. Any acts of violence, or threats to commit violence, experienced by any related personnel should be reported immediately to Human Resources or through the whistleblowing policy and hotline.

## **2. Harassment and Bullying**

In general terms, harassment is unwanted conduct (including of a sexual nature) towards an individual by another individual, because of that person's actual or perceived protected characteristic, or association with someone who has a protected characteristic. This includes but is not limited to, any conduct that violates an individual's dignity or creates an intimidating, hostile, humiliating, degrading or offensive environment, even if it was not intended as such.

Harassment can include unwelcome physical, verbal, visual/graphic or non-verbal conduct and applies to all protected characteristics. This may include, but is not limited to: verbal and written harassment through jokes; racist, sexist, homophobic or sectarian remarks; comments about a person's disability, offensive language, gossip and slander; sectarian songs; mobile telephone ring tones; threats; letters, emails, texts, social networking websites and/or electronic media; visual displays or posters, computer screensavers, downloaded images, graffiti, flags, bunting or emblems, or any other offensive material; isolation or non-cooperation at work, exclusion from social activities, coercion, and intrusion by pestering, spying, following, etc.

Bullying of any kind is also not tolerated and includes, but is not limited to, offensive, intimidating, malicious, or insulting behavior, or an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient. There shall be no bullying of any individual based on protected characteristics.

## **3. Sexual Harassment**

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal, graphic/visual or physical acts of a sexual or sex-based nature where (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's working arrangement; (2) a decision is based on an individual's acceptance or rejection of such conduct; or (3) such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment. This may include, but is not limited to: making unsolicited and unwelcome written, verbal, physical and/or visual/graphic contact or conduct with sexual overtones; unwelcome leering, whistling, sexual gestures and other inappropriate conduct; requests or demands for sex or sexual favors; sexual jokes, epithets, gossip, conduct or comments; posting or displaying sexually explicit materials in the workplace or on one's computer; making unwelcome sexual advances; making reprisals, threats of reprisal, or implied threats of reprisal following a rejection of a sexual advance; engaging in implicit or explicit coercive sexual behavior which is used to control, influence, or affect the working conditions and/or work environment of another individual; sexual inquiries of any kind; discussion of sexual activities; assault or coerced sexual acts; sexually explicit voicemails or emails; and offering favors of any type or benefits in exchange for sexual favors. The policy of the organization is to provide a work environment free from sexual harassment, and offenders are subject to action up to and including immediate termination of any arrangement.

The above list is not exhaustive. Any form of sexual or other forms of unlawful harassment are unacceptable in any work-related settings such as business trips and business-related social

functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. Individuals must avoid situations that present the inherent potential for sexual harassment, discrimination, or retaliation, including personal relationships between a supervisor or manager and the those supervised or evaluated. If anyone is involved in such situations they must discuss them with Human Resources immediately they arise.

It is unlawful to retaliate or discriminate in any way against anyone who has expressed good faith concerns about sexual harassment or any other unlawful conduct.

#### **4. Other Forms of Harassment**

The organization prohibits all forms of unlawful harassment by managers, fellow employees, employees of outside vendors or clients, and others. Any forms of harassment related to an employee's race, color, creed, gender, gender identity, genetic information, sexual orientation, pregnancy or pregnancy related condition, veteran, military or marital status, religion, disability, age, national origin, ethnicity or based on other classifications protected by applicable state, federal or local laws is a violation of this policy and any employees doing so will be subject to disciplinary action up to and including termination. While this policy sets forth Humentum's goals of promoting a work environment that is free of sexual and other forms of unlawful harassment, the policy is not intended or designed to limit the organization's authority to discipline or take remedial action for conduct that Humentum deems unacceptable, regardless of whether that conduct satisfies the legal definition of sexual or other form of harassment. Preventing the occurrence of harassment, discrimination and retaliation is the responsibility of all related personnel.

#### **5. Complaint Policy and Procedure**

All related personnel are expected to work in the spirit of cooperation. However, it is recognized that individuals may occasionally have work related grievances or complaints. Complaints may relate to, but are not limited to, terms and conditions of employment, health and safety, equal opportunities, discrimination, retaliation, bullying and harassment.

Humentum will try to resolve any complaints as quickly as possible. Related personnel are encouraged to discuss any concerns they have about the work they do or the people they work with, and attempt to agree to a solution informally, with their Humentum contact. It is recommended that complaint resolution procedures be started promptly.

##### **5.1. Step 1**

The individual should promptly bring the complaint to the attention of their Humentum contact and/or Human Resources, by submitting a written statement if possible. The statement should contain a summary of the facts as the individual perceives them and must be signed and dated by the individual. If the complaint involves their contact, then it is permissible to submit the complaint directly to Human Resources.

## 5.2. Step 2

The Humentum contact and Human Resources will investigate the complaint and attempt to resolve it. Information concerning an individual's complaint is to be held in strict confidence, unless prohibited by law. In many cases, however, the organization's duty to investigate and remedy harassment, discrimination or retaliation may make absolute confidentiality impossible. Nonetheless, all reasonable efforts shall be made to protect the privacy of the individual(s). For example, supervisors, Human Resources, and other members of management who investigate a dispute are expected to only discuss it with those individuals who have a business need to know about it or who are needed to supply necessary background information.

## 5.3. Step 3

At the conclusion of the investigation, Human Resources will schedule a meeting with the individual who filed the grievance to discuss the final report on the findings and any corrective or disciplinary action taken, including, but not limited to, warnings, counseling, suspension, job transfer or immediate termination. Individuals are expressly prohibited from recording the meeting without prior written consent, to the extent permitted by law. UK employees have the legal right to be accompanied by a fellow work or trade union. Final decisions on complaints will not be precedent-setting or binding on future disputes unless they are officially stated as organization policy. If the individual wished to appeal about the decision, a limit of five days is set. The Global Director, Finance & Operations and/or Chief Executive Officer (CEO) will hear the appeal and their decision will be final.

Individuals will not be penalized or retaliated against for proper use of the complaint procedure, for reporting perceived violations of the policy or the law, pursuing any complaint, or cooperating in any way in the investigation of such complaints. Frivolous complaints will not be tolerated.

## 5.4. Contact Information

Jocelyn Boughton  
Global Director, Finance & Operations  
[Jocelyn.boughton@humentum.org](mailto:Jocelyn.boughton@humentum.org)  
+44 7799 415297

Christine Sow  
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+1 (202) 921 4236

## 5.5. External Reporting Hotline

<https://humentum.ethicspoint.com>

## 6. Retaliation Against Whistleblowers Prohibited

It is contrary to the values of the organization for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, retaliation or harassment, or suspected fraud, or suspected violation of any regulation or law governing the operations of the organization. Anyone, regardless of position or title, who the organization determines has violated the policy against retaliation may be subject to action including termination of any relationship.