

## Policy to Prevent Sexual Harassment

### Policy Statement:

CIP is committed to provide a diverse and safe environment to all employees free from any form of discrimination of any type, and from harassment at work including sexual harassment. CIP will operate under a zero-tolerance for any form of sexual harassment in the workplace, treat all allegations of sexual harassment seriously and with utmost respect, and promptly investigate all complaints. This zero-tolerance means that no form of unlawful discriminatory or harassing conduct by or towards any employee, students, contractors and consultants. Any person found to have sexually harassed a colleague will face disciplinary action, up to including immediate discharge, or remove from leadership for first offense. which can lead to dismissal. CIP will protect any individual that make such a complaint and will not be victimized.

At CIP it is vital that everyone maintains the highest standards of conduct, integrity and ethics and complies with local legislation. If an employee, student, consultant or contractor has any genuine concern about sexual harassment, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be protected from victimization and dismissal.

CIP strictly prohibits any form of mental, physical, verbal or written sexual harassment, whether intentional or unintentional, occurring within or outside of the workplace by an employee and especially by an employee with a leadership position. CIP will investigate and resolve reported instances of sexual harassment with confidentiality to protect its employees and to uphold and maintain its high ethical standards within the workplace.

CIP will enforce and ensure all employees, students, contractors and consultants are informed of this policy and the laws implemented within the countries that CIP operates, that have established regulations and punishments for acts of sexual harassment within the workplace.

### 1. Description

**1.1** Sexual harassment is any form of unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment and may be physical, verbal and non-verbal. The offensive behavior can be isolated or infrequent.

Any individual can be a victim of sexual harassment, regardless of their sex, level or position. Sexual harassment may also occur between people of the same sex. What defines sexual harassment is that the sexual conduct is unwanted by the person whom the conduct is directed.

**1.2** Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical Conduct:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

Verbal conduct:

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted date requests or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)
- Threats, and offensive behavior of unwanted conduct

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

**1.3** All sexual harassment is prohibited whether it takes place within CIP premises or outside, including at social events, business trips, training sessions or conferences sponsored by CIP.

## **2. Complaints**

**2.1** Anyone who is subject to sexual harassment should –when possible—inform the alleged harasser that the conduct is unwanted and unwelcome. CIP recognizes that sexual harassment may occur in unequal relationships (i.e., between supervisor and a direct report) and directly expressing discomfort may not be possible. If the victim cannot confront the harasser, he/she can approach HR staff.

Victims of sexual harassment may lodge an informal complaint or a formal complaint. In both cases, a senior HR staff will provide counseling and advice. Every effort will be made to maintain employee confidentiality and protection of no-retaliation.

**2.2** Complaints are encouraged to be reported to the manager/leader and/or an HR staff. Depending on the severity, it can be launched as an informal or formal complaint:

An **Informal complaint** can be presented by the victim to HR, as a first approach, to facilitate a discussion between both parties to achieve an informal resolution acceptable to the complainant. Prior to this meeting, the harasser is given the opportunity to understand the complaint, the process and investigation, and provide a response. Depending of the severity nature of the case, and local labor laws, it might develop into a formal complaint. A confidential record is kept in the personnel files.

A **Formal complaint** is when the victim presents their grievance to HR. This should be done using the CIP Sexual Harassment Complaint Form (POD-FRM-045), through any Senior HR staff. This will ensure the prompt and thorough investigation.

**2.3** When the sexual harassment complaint is received, the following information will be logged:

- record the dates, times, location, witnesses, and facts of the incident(s)
- evidence documenting the harassment (pictures, messages, audio, others)
- gather the views of the victim as to what outcome he/she wanted
- share with the victim the procedures for dealing with the complaint
- Mutual agreement to keep a confidential record of all discussions

Reports can also be conveyed through the [www.lighthouse-services.com/cipotato](http://www.lighthouse-services.com/cipotato). Reports of false sexual harassment will be penalized.

### **3. Investigation and Disciplinary actions**

**3.1** After the complaint is received by the HR staff, the investigation will be initiated following the next steps:

- Interview the victim and harasser privately and individually
- Interview witnesses and third parties separately
- Based on the evidence, decide whether or not the incident of sexual harassment took place
- Complete a Case Management Report containing the findings and recommendations as a confidential record
- If the harassment took place, decide the appropriate measures and ensure implementation to stop the unwanted behavior.
- If the harassment cannot be determined, implement appropriate measures to ensure a healthy workplace.
- If harassment complaint is false, the appropriate penalty will be implemented.
- Guarantee that the investigation is done expeditiously, and measures are implemented within 5 business days of receiving the complaint.

- The investigation will take place even if the harassment happened a long time back.

**3.2** Any individual who has been found to have sexually harassed another person, will be penalized according to the severity and extend of the harassment, to any of the following sanctions:

- verbal or written warning, linked to performance evaluation
- suspension, also linked to performance evaluation
- dismissal
- This information will be recorded in the Case Management Form and in the individual's personnel file.
- The case may also be reported to the police or relevant local authorities if it is a criminal offense, and CIP will comply with local labor regulations.

**3.3** During the course of the investigation, CIP will ensure that the complainant is protected from any retaliation, even consider the possibility of reassigning to a different reporting manager or sub-unit. Any sort of retaliation against the complainant or witness is strictly prohibited.

#### **4. Implementation, Monitoring and Continuous Improvement**

**4.1** CIP will ensure that this policy is widely disseminated to all employees, members, vendor or other person in our workplace or jobsites globally. It will be included in the HR Staff Manual and staff will be trained on the content and understanding of this policy through the Induction Program upon joining CIP and a refresher training course will be also provided. It is the responsibility of every manager to ensure that their staff are aware of the policy.

**4.2** Roles of Leaders, managers and supervisors, have a crucial responsibility to uphold and maintain an environment free from sexual harassment for the employees within their departments/units; and are expected to remind their employees of the existing code of conduct and policies set forth whenever they observe any intentional or unintentional acts of potential sexual harassment.

**4.3** Supervisors or managers that are the recipients of reports of sexual harassment must contact an HR professional immediately to ensure that the proper process is initiated promptly. It is also the supervisor's responsibility to remind their staff about the Code of Conduct and this Sexual Harassment Policy, and take corrective actions, and protect individuals who report sexual harassment from retaliation.

**4.4** CIP will monitor the implementation of this policy and preventive training. The HR Head will provide yearly statistics and measures taken, including the supervisor's engagement.

**Effective Date:**

Approved: December 2013

Revised: November 2018

Revised: August 2019

### CIP Employee's Sexual Harassment Complaint Form

If you believe you have been sexually harassed by any member of CIP, you are encouraged to bring it to the attention of your Manger or leader, CIP's HR Global Head, or any CIP HR manager. This form may be used to report details about the incident.

- Today's Date: \_\_\_\_\_
- Reporting Employee:
  - Name: \_\_\_\_\_
  - Title & Department: \_\_\_\_\_
- Person causing harassment:
  - Name: \_\_\_\_\_
  - Title & Department: \_\_\_\_\_
- Date(s) of incident(s): \_\_\_\_\_
- Location where incident(s) occurred: \_\_\_\_\_
- Names of person(s) that may have observed the incident(s):
  - Name: \_\_\_\_\_
  - Name: \_\_\_\_\_
- Actions, verbal or physical, made by person causing harassment:  
\_\_\_\_\_  
\_\_\_\_\_
- Reaction/Actions, verbal or physical, taken by you to express discomfort:  
\_\_\_\_\_  
\_\_\_\_\_
- Response (to your reaction) by person causing harassment:  
\_\_\_\_\_  
\_\_\_\_\_
- What have been the effects of this incident(s) on your job performance?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Your Signature \_\_\_\_\_